

David Clark Representor No 1169805 statement to inspector for Matters 1-3.

M1

Q1.2. There has been a worrying lack of public consultation for Skerningham Garden Community site 251 - the largest allocated site within the Draft Local Plan (DLP) - with many in local communities, including myself, first reading about the large Skerningham development in The Northern Echo local newspaper.

The developer, with support from Darlington Borough Council (DBC) and the Tees Valley Mayor, submitted a bid application for a garden community to MHCLG in 2018. Part of their application pack included a number of documents, one is entitled "North Darlington, Skerningham A Garden Community for Tees Valley" dated November 2018.

In this document, it is stated that Skerningham Estates Ltd is the developer and has been engaging with the local communities for 2 plus years from the date of the document, so indicating from around 2015-2016. There have been no such engagements with communities, in fact Skerningham Estates Ltd were only incorporated on 30th June 2017.

A public consultation was held at Harrowgate Hill working men's club on both Wednesday 11th and Saturday 14th October 2017 for a Skerningham Garden Village. An invite to attend was sent out in a leaflet stating it was being hosted by Theakston Estates Ltd in conjunction with DBC, with The Banks Group in attendance. These consultations were a series of display boards with no mention of Skerningham Estates Ltd. Many residents that attended have later said it was a presentation of "this is what we want so this is what you are going to get" from both Theakston Estates Ltd and DBC. Even the questionnaire handed out was biased, with no option to write their objections, just a series of questions of, "What would you like to see in this large development in North Darlington?" I attended and came away with the same impression.

The display boards stated the plans had the backing of local landowners. I have recently been informed one of these landowners also attended the consultation and was surprised to see their land included in the Garden Village plan, so called their land agent to discuss their surprise. During the consultation I asked some questions. Two of these were:

- How much of Skerningham does the developer actually own - the answer given to me was around 40% with the remainder being owned by DBC, Darlington Golf Club and local farmers.
- I asked would Skerningham woodland be affected by the development - the answer given was part of the woodland would remain. I replied, "You cannot cut the woodland down," and received the reply, "We can as we own it."

To date, these two Theakston Estates Ltd-DBC events are the only public consultation events for the large Skerningham Garden Community development for local community residents to attend. Since then, there have been many important reports. For example, early master-planning traffic-modelling reports that would have helped local communities make a much better-informed decision about this large development and understand how the environment surrounding their homes will change were not made available on the DBC website, some only appearing after Regulation 20 Draft Local Plan public consultations had expired. This is wrong, especially for such a large development that is proposing access routes from the development out onto existing roads. These roads are heavily congested during school term time rush hours. If built even more traffic will join the school run as there are three schools along the busy A1150.

MHCLG Garden Communities prospectus (link below) states local communities should be engaged with from an early stage and have a meaningful say in developing the proposal from design to delivery. At this stage, local communities have not been engaged with nor had a meaningful say. We do not even know what is to happen to the community woodland, apart from knowing the developer has plans to relocate Darlington Golf Club from its current site into this woodland.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805688/Garden_Communities_Prospectus.pdf

Point 12 from above: *Proposals should set out how the local community is being, or will be, engaged and involved at an **early stage**, and strategies for **continued community engagement** and involvement. **We are clear that local communities - both current and future residents - must have a meaningful say in developing the proposal from design to delivery.***

From DBC document - Involvement of Communities:

The Statement of Community Involvement (SCI) (Part 1) sets out how Darlington Borough Council will involve local communities:

2.1 We will always apply some general principles to our planning consultations/engagement. These are set out below:

- a) **We will communicate clearly;***
- b) **We will make it easy for you to be involved;***
- c) **We will make sure your involvement is effective;***
- d) **We will share information and provide feedback;***
- e) **We will keep the process simple;***
- f) **We will learn from our mistakes***

Availability of documents: Many important decision-making documents, such as traffic-modelling reports, infrastructure delivery plans, overviews of where link roads would go onto sites like 251 Skerningham, access routes on and off the development, were not made accessible to the public during the Draft Local Plan public consultation periods.

The public, or those who know about this large development, as worryingly many in the local communities still do not, have been asked if we wanted to comment but we did not have access to many important pieces of information to help us have any meaningful say about the development of Skerningham. I, and others, feel excluded and not well informed.

Many of us asked for information, such as where the locations of the access routes for Skerningham Garden Community will be. Many questions have been raised at a number of Council meetings (if required, these residents' questions being asked can be viewed on DBC's YouTube channel as meetings have now been live-streamed and recorded during the pandemic), only to be told, "These will all be discussed with the public once full planning applications are submitted by the developers."

The full planning application stage will be too late for local communities to make an informed decision, have a proper meaningful say, or know how these large housing developments will affect their local environments. Many residents had to resort to submitting Freedom of Information requests but many of these were delayed or refused by DBC.

Residents had to then report their concerns to the Information Commissioner's Office (ICO) to get their help and they politely requested information that the public has the right to have access to under FOI-EIR regulations. A link below to one such example, published online by the ICO:

<https://ico.org.uk/media/action-weve-taken/decision-notices/2020/2617189/fs50861177.pdf>

Q1.8 Climate Change

Critically, in terms of climate change policy, local plans are legally required to contain policies that contribute to the mitigation of, and adaptation to, climate change, in line with the Climate Change Act. At present, the Climate Change Act dictates that the UK achieves an 80% reduction in CO₂ emissions by 2050, which is likely to imminently be upgraded to full carbon neutrality. This means that local plans should:

1. Include an understanding of the baseline CO₂ emissions within the council area, and the emissions inherent in future development within the plan period.
2. Demonstrate how the policies and actions in the local plan will reduce emissions in line with an 80% reduction in CO₂ emissions by 2050 as required by the Climate Change Act. (In practice this generally means that new development needs to be zero carbon in construction.)

The Town and Country Planning Association recently conducted a survey of local authorities that revealed the vast majority (83%) do not have either the knowledge nor resources to incorporate the impact of climate change in planning decisions. Councils also said they needed better information on local impacts (77%) and the resources to review applications and conduct better analysis (71%).

The growing threat of climate change will have a profound impact on communities and planning policy will play a central role in building community resilience to mitigate climate change. By the 2050s, the annual costs from flooding in the UK are expected to increase by between 25% and 80% depending on whether global temperatures warm by 2°C or 4°C.

A sound, positively prepared, justified, effective local plan that is consistent with national planning policy should deliver higher densities of development on the most accessible sites that do not rely heavily on vehicle usage which will increase carbon monoxide levels. Darlington's Draft Local Plan has allocated vast swathes of greenfield open countryside sites surrounding the town for large urban expansions to help get access to Government funding for new roads. This is especially the case in the North of the town where an inner and outer ring road are planned.

Expensive carbon-producing new infrastructure road-building for the thousands of car-dependent residents living in these new urban extensions will be needed. Existing and new local communities will be subjected to the harmful chemicals from emissions due to the increase in traffic, which in turn will contribute to the climate crisis.

Chapter 14 of the NPPF refers directly to meeting the challenges of climate change, flooding and coastal change. It states the planning system is required to support the transition to a low-carbon future and take account of climate change and coastal erosion (where relevant).

Plans should shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimize vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

We see little evidence that the Darlington Draft Local Plan has been climate-change audited and do not see much mention of the Climate Change Act 2008 or how our Local Plan will help towards the Government's carbon net-zero 2050 targets. A climate-change addendum has been added to the Local Plan examination document portal, but this was only when the Inspector's examination had started.

M2

Q2.1 – Q2.3

Housing Numbers

Darlington Borough Council Cabinet meeting dated 12th September 2017, a copy of the minutes from that Cabinet meeting in the link below:

<https://www.darlington.gov.uk/PublicMinutes/Cabinet%5CSeptember%2012%202017%5CItem%209%20-%20Housing%20White%20Paper%20and%20Local%20Plan%20Progress.pdf>

The Government's standard methodology OAN figures for the preparation of the Draft Local Plan were discussed in this meeting as well as the bids to the Housing Infrastructure Fund. The Council were reluctant to use this methodology and so needed to come up with an "exceptional circumstance" not to use the Government housing numbers.

The Council commissioned a report from Opinion Research Services, based in Swansea. This report states that the Government's standard methodology figures for Darlington were flawed. It states that if the town generates 7,000 new jobs then 10,000 new homes may need to be built to house the new employees. However, ONS unemployment figures in Darlington make a different and worrying reading. In May 2016 these were **2,085 - 3.2%** of the working population.

As of February 2021, this figure has risen to **4,665 - 7.2%**. Once the Government's furlough scheme expires, these figures are predicted to rise even further, therefore any new jobs will be taken by those already living here looking for work as opposed to thousands moving into the region as the ORS report and DBC's controversial Local Plan are predicting.

The commissioned report has a number of aspirations converting into predictions about a Darlington population surge, there's double number counting and calculations that simply do not add up.

The local communities crowd-funded to employ an independent consultant to assess both the ORS commissioned report and DBC's controversial DLP. A link to the Blue Kayak community crowd-funded report below:

<https://drive.google.com/file/d/1LdMSST6j9dulUzn2VEXqhZcjrO04A2iK/view>

<https://drive.google.com/file/d/1rJ9gmFVB3ncBE0EvvoMRKHdixBwVKd70/view>

Some may say the Freeport will create thousands of new jobs but these will be over in Teesside, so most of the new TVCA created jobs will be over there. NPPF states we should not be building housing developments that are car-dependent, therefore our Local Plan cannot be based on new jobs in Teesside. The large Wynyard Garden Village over there, with its 6,500 new homes, can cater for any new residents relocating to the area for any Freeport created jobs but, once again, due to the increase in unemployment since 2016 most will be taken up by those already living here in need of work following the pandemic.

M3

Q3.2 Is the hierarchy and associated broad distribution of development reasonable, having regard to alternatives that were considered during the preparation of the Plan?

A lot has happened since this DLP was produced in 2015-2016 - Brexit, the UK's declaration of a Climate Change Emergency in May 2019, the current COVID pandemic and unemployment in Darlington rising from 3.2% to 7.2% (as above). The Local Plan does not seem to include consideration for the allocation of sites already within the town's current planning boundaries such as the town centre fringe and neglected brownfield sites as alternatives to allocating large swathes of food-growing farmland greenfield sites that are climate-change friendly. Soil and hedgerows have good carbon sequestration.

The allocation of these greenfield sites seems to form an arch from the Coniscliffe area to the West of Darlington over to the North, through West Park Garden Village, Burtree Lane Garden Village, Skerningham Garden Community, then over to the East towards Burdon Hill, with new link roads to be built through these sites which the planning officers are calling the Darlington inner ring road. So it's a Local Plan designed to facilitate the funding and building of new roads for car-dependent urban sprawl to surround the town, (appendix 1.0) below.

There is no large housing shortage in Darlington I am a financial adviser with over 25 years experience specialising in mortgages and I have not had a client unable to find properties available for sale in the town, in fact if you were to contact local estate agents, they will inform you of the thousands of empty properties in Darlington.

what I am seeing are clients struggling with finding more affordable homes to buy especially first-time buyers as they tend not to have large deposits. They and many home movers are not looking for large premium prices 4-5 bedroomed homes that some developers and new home builders may try to squeeze into these sites.

The governments help to buy equity loan scheme has now amended to only being available to true first time buyers (those how have never owned a property in their lifetimes) with a North East new build price cap of only £186,100. At the time of writing this the average deposit lenders are asking for on a new build purchase mortgage is 15% some asking for 20% deposits.

The government's backed guarantee of up to 95% loan to value mortgages that became available this month are NOT available for new builds.

Darlington's true housing need are more affordable homes and more elderly residents same level homes, NPPF state we should be building homes in the right places that are not reliant on owning cars residents should be encouraged to walk, cycle and use more public transport.

Darlington's Draft Local Plan is looking to offer more than four times the number of homes the Governments OAN-ONS data say we may require with allocation of thousands of hectares of greenfield sites most good food growing farmlands surrounding the town to help fund polluting climate change emergency unfriendly new link roads to accommodate car dependent urban sprawl.

We produce less than 50% of the food we consume each year, we are a nation that is over £2 trillion in debt, we declared Climate change emergency in May 2019. In Darlington we should be protecting our edge of town, food producing, carbon storing farm lands not pouring concrete, tarmac to develop them to encourage residents to drive everywhere when we have neglected brownfield sites already within the towns current planning boundaries these have been ignored in Darlington's controversial DLP .

I have not made reference to any NPPF paras in this statement as I know Mr Fieldhouse with have exceptional knowledge on the NPPF so will quite easily relate my comments to the correct parts of it.

The proposal

