1. **Introduction and context**

1.1 This statement has been prepared by Jo-Anne Garrick Ltd on behalf of Low Coniscliffe and Merrybent Parish Council (LC&MPC). The parish council has made detailed representations at each stage of the preparation of the Darlington Local Plan (DLP). Furthermore, LC&MPC engages fully in development management process, providing detailed comments on planning applications within and potentially impacting on the parish.

1.2 LC&MPC was the first parish in the Darlington Borough Council area to successfully prepare a neighbourhood development plan. The plan was subject to referendum in May 2019, where there was a 46.23% turnout, it was supported by 94.7% of those who voted. The Low Coniscliffe and Merrybent Neighbourhood Plan was adopted in June 2019.

1.3 The parish council is therefore an important stakeholder in the plan making process and welcome the opportunity to participate in the examination process.

2. **Response to the Inspector’s Matters, Issues and Questions**

   **Presumption in favour of sustainable development (policy SD1) (Q3.1)**

2.1 LC&MPC does not have any specific comments to make in response to question Q3.1, but they wish to reserve the right to make further representations regarding this issue in so far as it may impact on the parish.

   **Settlement hierarchy (policy SH1) and the distribution of housing and employment development allocations (Q3.2 and Q3.3)**

2.2 The need to identify a settlement hierarchy which then informs the distribution of development is supported. However, LC&MPC consider the settlement hierarchy does not form the basis for the spatial approach of the local plan. Policy SH1 is clear that the purpose of the settlement hierarchy, with regard to the rural villages, is to protect and where possible enhance the character of the rural villages, including their relationship and setting within the surrounding countryside.

2.3 The distribution of housing development through allocations proposed in the plan and the identification of a housing requirement of 1,087 dwellings for the rural parish of Low Coniscliffe and Merrybent is contrary to the approach of SH1 and the made LC&M
neighbourhood plan. Only 0.7% of the population of the borough live within the parish of LC&M, the level of development proposed is completely disproportionate. Furthermore, the proposed location of Coniscliffe Park development would clearly remove the separation between Darlington and the rural villages of Low Coniscliffe and Merrybent.

2.4 In order to make the plan sound, the distribution of housing should be amended to reflect the strategic approach of the local plan as defined within the settlement hierarchy set out within policy SH1. This would result in:

- the amendment of the neighbourhood area housing requirement, set out in policy H1, to reflect the level of housing that is appropriate for the rural parish, informed by the Low Coniscliffe and Merrybent Housing Needs Assessment and the made neighbourhood plan which allocates land to deliver 23 new homes;
- the removal of the strategic housing allocations at Coniscliffe Park, identified with policy H2; and
- the identification of a rural gap between Low Coniscliffe and Darlington, to conserve the rural settlement pattern which is identified as important to the character of the local area.

2.5 LC&MPC fully supports the statement submitted by the Darlington Green Party with regards to the distribution of housing.

Development limits (Q3.4 and Q3.5)

2.6 LC&MPC do not consider the amended Darlington urban area development limits that fall within the Low Coniscliffe and Merrybent Parish, in relation to the strategic allocations are based on evidence that is relevant, up to date, adequate and proportionate.

2.7 The need for the allocation of the two strategic sites at Coniscliffe Park has not been justified within the local plan or its supporting evidence base. The only justification for the sites appears to be to deliver the excessive housing requirement. Coniscliffe Park has not been justified as the most appropriate location for housing development. It will be physically detached from the urban area, resulting in the merger of Darlington and Low Coniscliffe. This is in clear conflict with the vision, aims and objectives of the local plan and indeed policy SH1 (settlement hierarchy).

2.8 LC&MPC submit that the removal of the two strategic sites at Coniscliffe Park from the plan and the revision of the Darlington urban area development limits to exclude these sites would ensure that this element of the plan is sound.

2.9 LC&MPC support the council’s proposed changes to the development limits to the Low Coniscliffe and Merrybent villages, as this will result in consistence between the boundaries within the LC&MNP and the local plan.