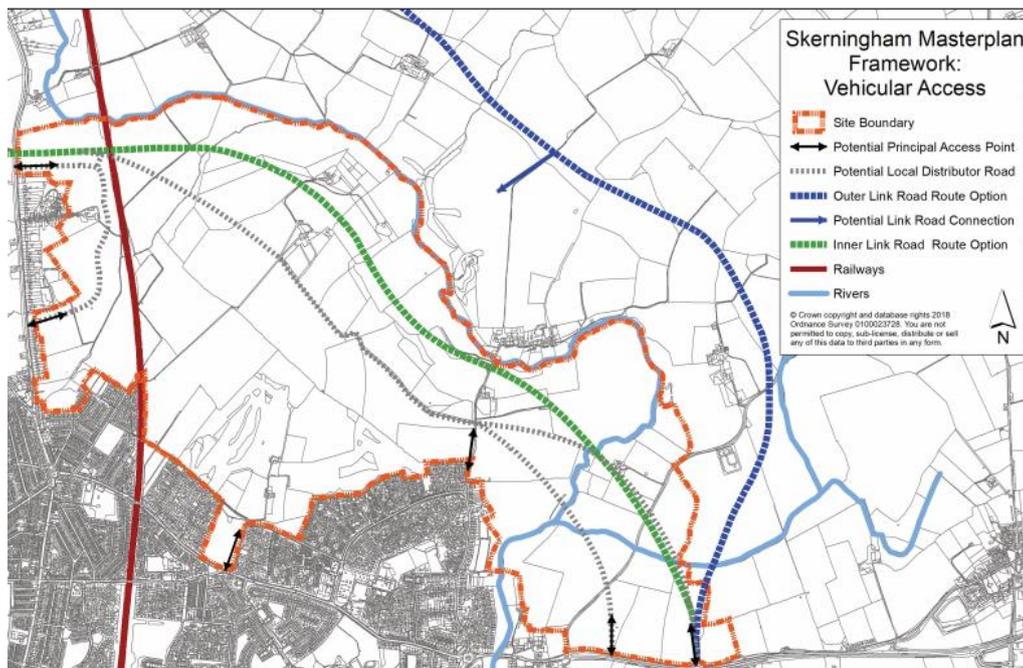


## Statement Question 4.5 a,b,c,d

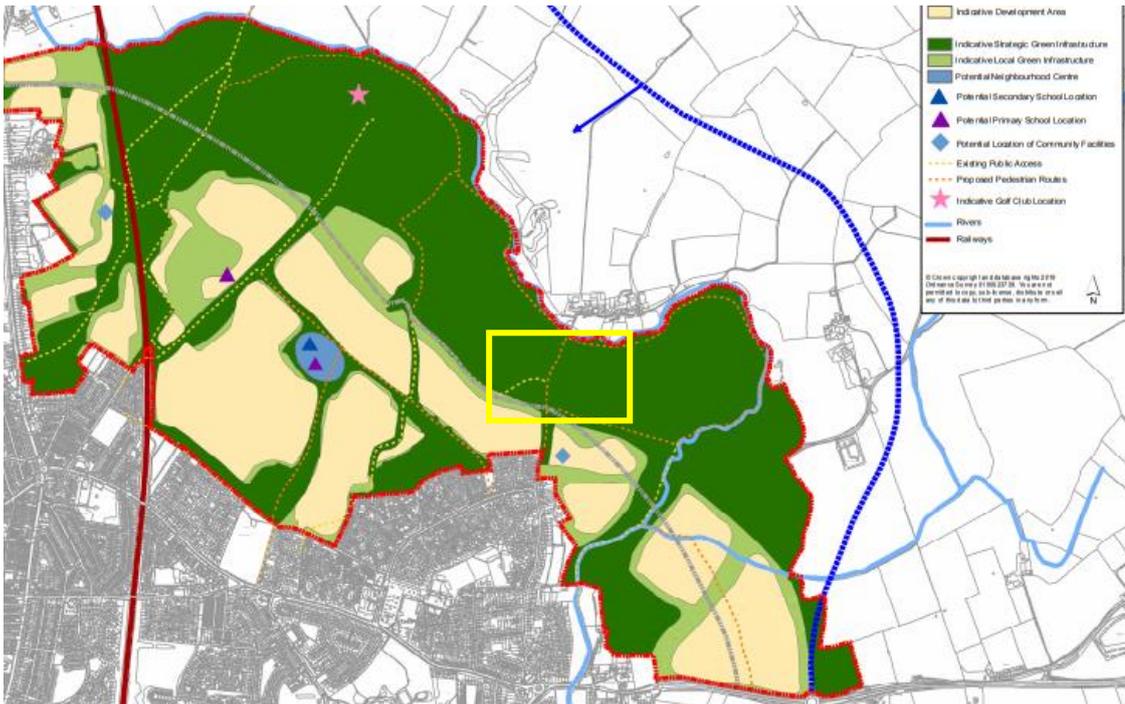
### Transportation (roads)

**NPPF Section 9 Paragraph 102** states that transportation issues should be considered from the earliest stages of plan making. In the draft plan shared in the summer of 2018 the illustration below was presented which showed a myriad of different road options none of which had really been thought out. It was also not clearly articulated what assessment had been undertaken to arrive at them. There are a few things missing from these illustrations such as:

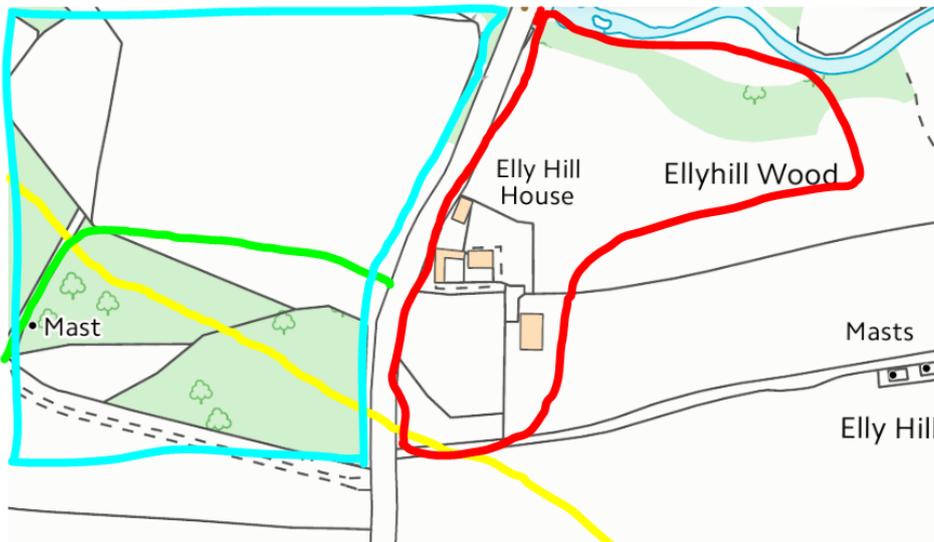
- Topography of the land the roads are situated upon which are largely undulating in nature.
- Land classification. Of particular concern are the green and grey roads which run through a community woodland and a landfilled quarry. The latter which is unlikely to be suitable for heavy development and has contamination concerns.
- Impact on historical/heritage assets that the green and grey roads run extremely close to.



Fast forward to the latest version of the plan and we got presented with the version below. Note the green road has now been removed but the grey remains. In this illustration you can better see how the road will carve through woodland and encroach on an existing public access point.



I found the above diagram lacking in detail so the below is a zoomed representation of how it will look based on this diagram. The yellow square above being the area denoted below. Note the red area being Elly Hill (**SD30 report**). The green line being the public access point/walkway. The blue outline being the old quarry which was backfilled and likely be suited to heavy developed. The yellow line being the proposed road included in the Reg19 version of the local plan. A simplified representation but gives better context.



Of concern and worth a mention are some “alternative” road layouts which have been circulating. The first as below was acquired from the Skerningham developer’s website (now closed down) and shows a similar road to the grey road show in the regulation 19 local plan. However, note how the road has shifted over closer to Barmpton Village and is practically on top of Elly Hill House and surrounding properties. The signage appears to denote a bridge connection running across Barmpton lane.



The second picture below is from traffic modelling reports which the council eventually released albeit only recently during the examination process. The report when published stated that no changes were expected to the local plan however If you look at the road below its very similar to the grey road in the regulation 19 version of the plan. I believe the road in the traffic modelling reports and the reg19 plan are one and the same.



In summary I believe the Skerningham allocation fails the provisions set out in **section 9 of the NPPF**. It should be noted that alternative options have already been closed down to the council (i.e. Springfield park) and these are a

last ditched attempt. The importance of getting transportation right was seen in the Ingleby Barwick housing estate in Stockton On Tees which had to undergo lots of disruptive roads works to improve its infrastructure when housing delivery was prioritised over roads (<https://www.gazettelive.co.uk/news/teesside-news/horrendous-traffic-rush-hour-ingleby-12177259>).

Skerningham would be arguably far worse as its largely bordered by the River Skerne. Of particular concern is the latest delivery proposal that 600 houses would be built before the link road is put in place (**Skerningham estates M1 statement appendix, Page 19, 7.14.1**). Barmpton Lane was simply not designed for this and with the number of walkers that use it there is a significant increase in the chance of a fatal accident.

Elly Hill House is my personal residence, so these link roads are extremely concerning to me as the house and its curtilage has stood largely unadjusted since it was built over 200 years ago. The house has a rich history and any roads should be sited well away from it. I paraphrase a council response *“In addition, in certain locations allocations and masterplan frameworks such as between the urban area and Barmpton and Great Burdon the Skerningham masterplan framework has been created to ensure the purpose of the policy can still be achieved which is to enable their distinctive separate characters to be maintained from the main urban area.”* A buffer of approx. ~5 Meters doesn't come close to achieving this.

## **Housing Numbers**

**Section 5 of the NPPF** states that housing requirements should be based on the standard method in national planning guidance unless exceptional circumstances apply. The council has stated on numerous occasions that the ONS figures of 177 houses per year do not apply. Following an independent report from the Opinion Research Services (ORS) this suggested the real figure was 492 houses per year. An increase of 315 houses or a 178% increase. The most recent of these reports dated 2020 contains a lot of information however I would argue a majority is speculative in nature, aspirational and seemingly prepared on a “glass half full” basis.

I was disappointed when reading the report that **section 1.12 (Covid) & Section 1.13 (Brexit)** were only briefly mentioned and dismissed so quickly. Both issues are still in their infancy. In the Covid situation the government is currently shielding the country by subsidising companies and individuals. It has been widely reported that when these schemes end, we will see negative impacts on the local economies with bankruptcies and job losses a very likely consequence. I have seen projections which show job losses as high as 850,000 as an aftermath. Brexit is a similar situation but one with more tangible evidence given its longer duration. There is a Brexit job loss index put together and in the last update the toll stood at 437,000 job losses with an estimated wage loss of £12.5billion. Truly exceptional in nature and I struggle to understand why some risk modelling was not factored into the report and figures for this.

## **Flood Risks & Woodlands**

The undulating nature of the Skerningham landscape means it's no stranger to issues of flooding during periods of heavy or persistent rains of which lends itself to be a critical flood defensive system for the northern part of the town. Of equal importance to this are the masses of trees and woodland located on the site which do their part in using this water runoff. Trees are proven to use more water than other forms of vegetation largely through the process of “interception”. Without going into specific detail this essentially means rains which never reach the soil as they are intercepted by the tree through its canopy. There have been many studies carried out on this which make for interesting reading (University of Delft, HHG Savenije, M C-Gerrits). To set the context for where we are today, I have attached some pictures taken recently (2021) of parts of the area. In the bottom left picture note the proximity to local houses (this picture was taken from Barmpton Lane)



In the Skerningham allocation the council has quoted that 45% of the site will be retained as green infrastructure and not forgetting a golf course must be fit into this. This suggests 55% of the land will be used for development purposes which is likely to result in a monumental amount of concrete been poured over the area robbing it of a significant amount of natural soakaway. The rainfall will still occur but will end up getting displaced from the new development and pushed into other parts of the area which will exasperate flooding and push water levels even higher. This will be further aggravated by the proposed loss of woodland resulting from this development:

- Movement of the golf course within the Skerningham community woodland which will result in the felling of a large area of woodland.
- Link road will run through the woodland and result in further loss of trees.

On the matter of the proposed relocation of the golf course this will shift the course within the woodland and closer to the River Skerne. Of concern with this is the extensive chemical treatments required to maintain the lush and idyllic greens which include pesticides, herbicides & insecticides. These will have adverse effects on the flora and fauna in the nearby vicinity of the new course and there is a possibility of these chemicals creeping into the nearby River and connecting water tables.

The significant loss of trees will result in more water runoff and there is a risk this pushes more water and flooding potentially towards the ex-quarry which has contamination issues. More water running or accumulating on this land increases risk of water contamination which will end up cycling back through the local area.

The head of the Environment Agency has publicly stated that housing developments should be avoided on flood plains. <https://www.bbc.co.uk/news/uk-51620992>.

In Summary the Skerningham site is not suitable for development in terms of flood risk for the above mentioned reasons. To provide further evidence I would like to highlight a **2015 version of the “Strategic Housing Land Availability Assessment”** In this document Skerningham was labelled as **site#40**. The document clearly states that the site is not suitable for development and highlights issues on flood risk of which some of the site is listed as flood risk 3. It also makes specific mention to the Barmpton quarry contamination concerns. There should be an inquiry into why the site has had suddenly become viable.

Finally, given the sites location to existing housing the flood assessments need to be more holistic; it’s not just about the flood risks of the new development but also of the existing housing which this development will jeopardise.

**NPPF Section 14, Paragraph 155** being particularly relevant regarding this. While the council did prepare “SD03 Flood Risk Sequential and Exceptions Test (2020)” it was insufficiently detailed with no real evidence or that a range of scenarios had been considered i.e. what impact the loss of woodland will have. There is a sentence in here which the council use the word “suspected” which to me says the assessment was not carried out properly and generalisations have been made.

### Climate Change

Climate change is a real and prominent issue affecting us all. Rising sea levels and more extreme weather events are becoming more and more frequent. **NPPF Section 14, Paragraph 148** mentions the planning system should support the transition to a low carbon future. The Climate section of the local plan website is sparse of any detailed information in this regard so one can only assume this has not been a major consideration of the planners who developed this.

With regards to the Skerningham site its useful to set out the main defining characteristics of the site:

- It currently has one fixed road (Barmpton Lane) which is a single carriage way road. As the Lane enters the Skerningham allocation site it becomes a country lane with no fixed markings and at points is barely wide enough to allow 2 cars to pass. The definition of the lane is ***“a narrow passageway between fences or hedges. 2 : a relatively narrow way or track”***. This section of the lane has no street lighting.
- Barmpton lane is connected to Whinfield Road which is notoriously crowded during rush hour times.
- As the crow flies the new link road will place the development approximately 3 miles away from the town centre which according to google directions would be an approx. 1 hour 15-minute walk.
- The new development looks to add ~4500 houses to the site over its development. Most family households now have 2 cars which means an additional 9000 cars. As the town centre is 3 miles away travel for recreation and commuting will likely be favoured by car pushing more traffic and further straining the existing roads. A significant increase in carbon monoxide will occur and be further exasperated by the proposed loss of woodland (less woodland to convert this to oxygen) adversely affecting residents health.

The government have recently (late 2020) set an ambitious new target of a reduction of 68% on greenhouse gas emissions by 2030 and becoming net zero by 2050. We are only 9 years away from the 2030 target and it must be considered that this local plan was written in a time when climate strategy was in a very different place. I believe the council need to review the plan holistically and modify plans accordingly. An appropriate framework should be in place to act as a governance mechanism for any new developments in the borough to ensure alignment with the country's climate change aspiration. It should be noted the UK has committed to reduce emissions at a faster rate than any other major economy. The time for traditional housing estates and the “we have always done it that way” mentality needs putting aside and a more radical approach taking.

## **Wildlife**

***NPPF Section 11, Paragraph 118b states that planning policies should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.*** This paragraph perfectly summarises the Skerningham allocation and what its true value is. Ask any local resident.

In the interest of word management, I won't name all the wildlife the site calls home but will refer to a public crowd funded Ecology report prepared by the Verde-ecology Consultancy. The report was carried out in 2021 conducted by live on site visits and contains a monumental amount of empirical evidence. Key summary includes:

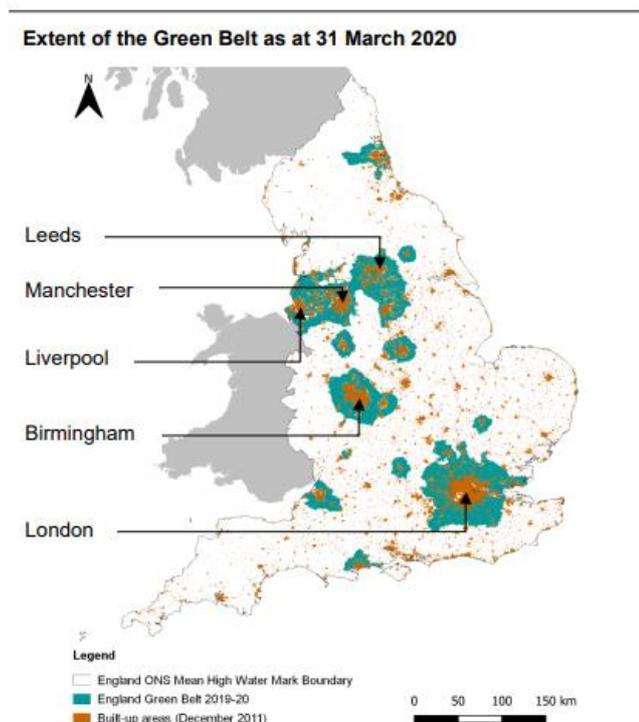
- A range of “Veteran” trees ranging from Truly Ancient through to Notable.
- The site is home to the rare “Black Poplar” which is a priority species and noted as endangered with less than 3000 left. A majority call Darlington home
- Details of birds, mammals present in the area including many on the yellow/red lists
  - Of special interest are sightings of bats & great crested newts
- Loss of woodland and green space results in less food and habitats for wildlife.

## **Report attached as appendix**

Despite the council dismissing COVID-19 impacts for planning purposes I would like to highlight that I believe the pandemic has resulted in a widespread shift in the importance people place on their local green spaces. I am fortunate enough to live in the Skerningham area with the front of the house looking out onto Barmpton Lane and the number of users frequenting the area during lockdown was simply incredible. In warmer weather during the day

it's not uncommon for the country lane part of Barmpton Lane to be packed with people walking onto the site to enjoy it.

I would request that the Council/Government consider protecting the site indefinitely via greenbelt status or similar. In this space the tees valley area is vastly underrepresented to other parts of the country:



**Green space**

*NPPF Section 15, Paragraph 170* states planning should contribute to and improve the local environment through enhancement and recognition of valued landscapes of which the Skerningham allocation meets this definition. The relocated golf course will take up part of the 45% land left over which means the actual amount for public use will be much lower. The council boldly claim net increase in woodland but with such little land remaining how can this be achieved ensuring a good quality design (i.e. not just planting a huge number of trees in a space).

**Heritage & Historical Assets**

Document SD30 gives full details of the site's rich heritage assets but I don't think enough consideration has been put into the planned proposal. If you look at the proposals the buffer between Barmpton village and the development will be approx. 400meters (approx. 100 meters is starting from Elly Hill House which is fair as its technically part of Barmpton) this doesn't feel far enough to achieve the councils aim of keeping the village character separate. Some of the heritage assets:

- Barmpton Hall. Home of Robert Colling famous for the "Durham Ox"  
[https://en.wikipedia.org/wiki/Robert\\_Colling](https://en.wikipedia.org/wiki/Robert_Colling)
- Elly Hill House and estate. Elly Hill House dates back to approx. 1780. Name hardcoded to maps

- Skerningham Farmhouse. Listed building.
- Numerous areas where items historically important have been found (ancient arrowheads, an iron age sword find on Barmpton lane just north Elly Hill)
- These are referred to in document SD30 “Heritage Assessment” amongst many others. This report stated that development would be better placed on the south of the site to protect/retain the historical assets. So why place roads in the northern part of the allocation?

### **Council transparency & public engagement**

Throughout my involvement in reviewing the local plan I have come across many examples where the council either fail to release important information promptly or just dismiss the public consensus. As a few examples:

- Traffic modelling reports – asked by the public on numerous occasions to share. Had to resort to provisions within the freedom of information act. Eventually released after regulation 19 closed.
- The council’s response to the inspector initial questions. Shared weeks late and as a result the hearing dates had to be adjusted. I heard the reason cited was “staff holidays” which shows a lack of value of people’s time.
- After reviewing in detail, the council’s response to regulation19 comments most were effectively dismissed as “we’re right, you’re wrong”. Very disappointed with the council’s lack of collaboration to create a plan that better meets the public views/needs.
- We are still waiting for some site viability assessments including one for Skerningham which was promised w/c 19<sup>th</sup> April. We need the full facts in good time to allow proper participation

Finally, I would also like to point out an issue which occurred during the council voting process for the local plan to put forward. A video celebrating victory of approval of the plan came to light that it was recorded before the vote took place. Worse still on one video was produced which concerned the public the vote was predetermined.

<https://www.thenorthernecho.co.uk/news/18284849.victory-video-one-produced/>

In summary the Skerningham development fails on so many parts of the NPPF and hence is unjustified. The allocation should be removed from the plan.