



Darlington Green Party (1250913)

Response to Inspector's Matters, Issues and Questions on the Darlington Local Plan

Blue Kayak Planning for Darlington Green Party

Matter 4: Housing Development

Q4.3

The approach to selecting housing allocations fails in the following respects:

It is not based on an objective analysis of need. The housing predictions are vastly inflated and rely on dubious methods, including reliance on dubious employment need predictions.

It is not based upon a solid evidence base:

- The Landscape Sensitivity Assessment only covers some large sites; it does not cover smaller sites (and therefore does not assess cumulative impact of development upon Middleton St George) nor does it assess sites which were granted permission before 2018.
- The Heritage Impact Assessments cover only five allocated sites. They do not cover sites given permission before 2018, smaller sites, or three larger sites: Maxgate Farm, Hall Farm, and Land South of Railway, Middleton St George.
- The Conservation Area Appraisals for Coatham Mundeville, Heighington and Middleton One Row, all of which might be affected by nearby housing allocations, are not published in the Document Library and do not appear to have been considered in the formulation of the Plan.
- The Strategic Flood Risk Assessment was not completed until 2019; no sites with flood risk were removed from the Plan as a consequence of it.
- There has been no analysis of the biodiversity and habitats value of each site. The Green Infrastructure Strategy maps protected sites as part of a broader green infrastructure network but - contrary to the requirements of para 174 of the NPPF - it does not assess or map unprotected wildlife-rich sites, including Local Nature Reserves.

Contrary to the NPPF, the Plan:

- Fails to make efficient use of land (paras 122-3). It allocates very large areas of greenfield land for development at extremely low densities, thus increasing land-take and damage to landscape and habitats, as well as making it harder to serve by public transport, cycling and walking.
- Does not accommodate at least 10% of its housing requirement on sites of no more than 1 ha (para 68 a)); only 436 dwellings are accommodated on such sites (that is, about 2% of the 14861 dwellings in the Plan).
- Fails to focus development on sustainable locations (para 103): all the larger sites are severed from the existing town by roads, railways, watercourses, industrial estates, or impermeable urban layouts. There is little potential for creating a network of direct and efficient walking and cycling routes between new and existing development, or for public transport services – which would in any case be rendered non-viable by the very low density of the development. It fails to prioritise existing urban brownfield sites.



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- Does not avoid areas of flood risk (paras 155-165). The Skerningham and Faverdale sites contain areas in Flood Zones 2 and 3, as do several smaller sites; most sites include extensive areas of significant surface water flood risk.
- Does not direct development to land with the least environmental value and does not safeguard local ecological networks (paras 170- 177). Although the Green Infrastructure Strategy identifies the Skerne valley as a Strategic Green Corridor and West Beck as a Local Green Corridor, the Plan allocates the Skerningham and Faverdale sites, respectively, across them. Given the very poor quality of the evidence base on biodiversity and habitats, it is not possible to establish the Plan's overall impact upon biodiversity.

The allocations include large areas which, according to the indicative masterplans, are not to be developed – overlapping with, but not the same as, areas of vulnerable habitat and flood risk, etc. This means these areas have an ambiguous status: given that the masterplans are indicative, if a proposal came forward for development within these areas, a developer could claim that no policy exists to prevent it. The NPPF makes a distinction between specific sites for development, and broad locations for growth (para 67); the Plan should do likewise.

The Plan does not take completions and commitments into consideration in its calculation of land requirement; it does not give a figure for completions since 2016. However, the housing trajectory in Appendix A enumerates 1804 completions in the four years since 2016 (175, 495, 596, 538). In fact, since the OAN according to the standard methodology for the Plan period is 3,310 dwellings, commitments (2652) and completions since 2016 (1804; a total of 4,456) overshoot the objectively assessed housing requirement by 1,146, or over a third.

Q4.5-13

Since no housing allocations are necessary to meet local needs, it is impossible for these allocations to constitute sustainable development.

Q4.5

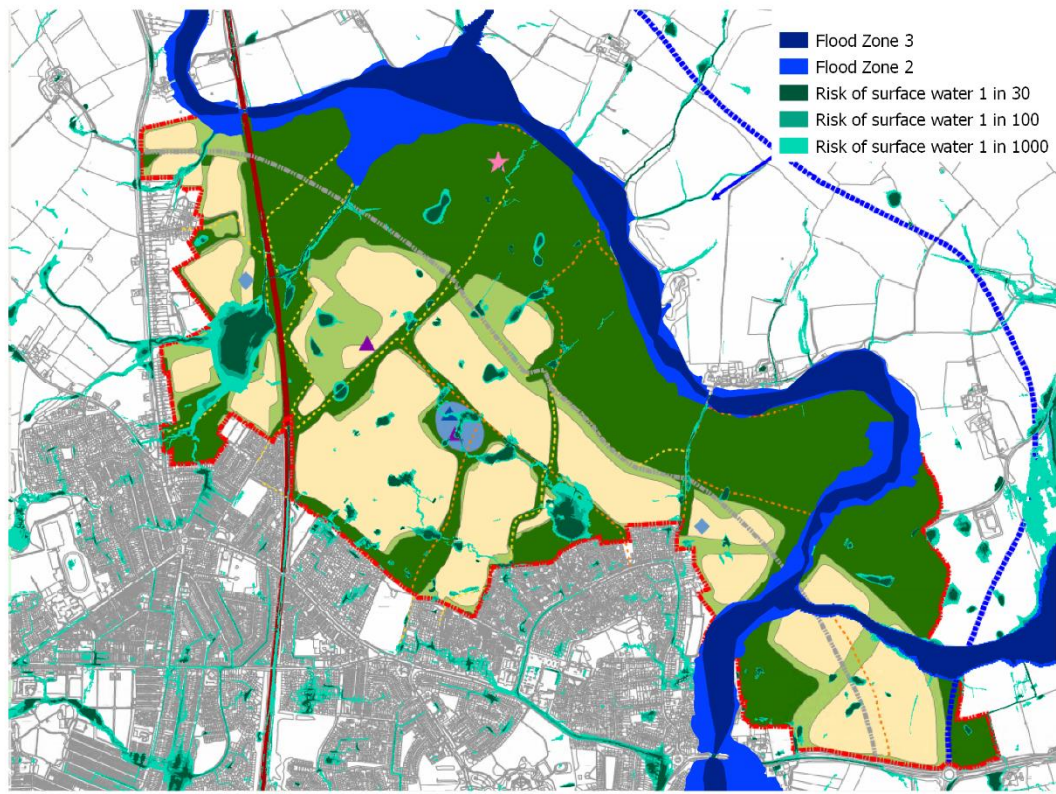
- a) Policy SH1 establishes Darlington as the focus for most new development and states that “Sustainable and accessible locations will be selected to enable further development.” The argument will be made that, because the Skerningham site is adjacent to the built-up area of Darlington, it is therefore an accessible extension to the town. It is not. Because of its vast size it incorporates very rural areas which are well over a kilometre from the existing built-up area and from the nearest road. Because of the impermeable layout of development in between the Skerningham site and Salter's Lane North/ Whinfield Road, there are few opportunities to link up the two: only Bishopton Lane and the proposed access route across Springfield Park. Barmpton Lane and Glebe Lane are not thought suitable as main access points to the site, in the latter case because of a weight limit on the railway bridge into the site. The proposed layout of the development – consisting of isolated pockets of development connected to existing main roads by a distributor road - exacerbates this separation.
- b) Low viability on the Skerningham site may lead to developers pressing for a relaxation of quality standards and a reduction in developer contributions. This is particularly significant given the



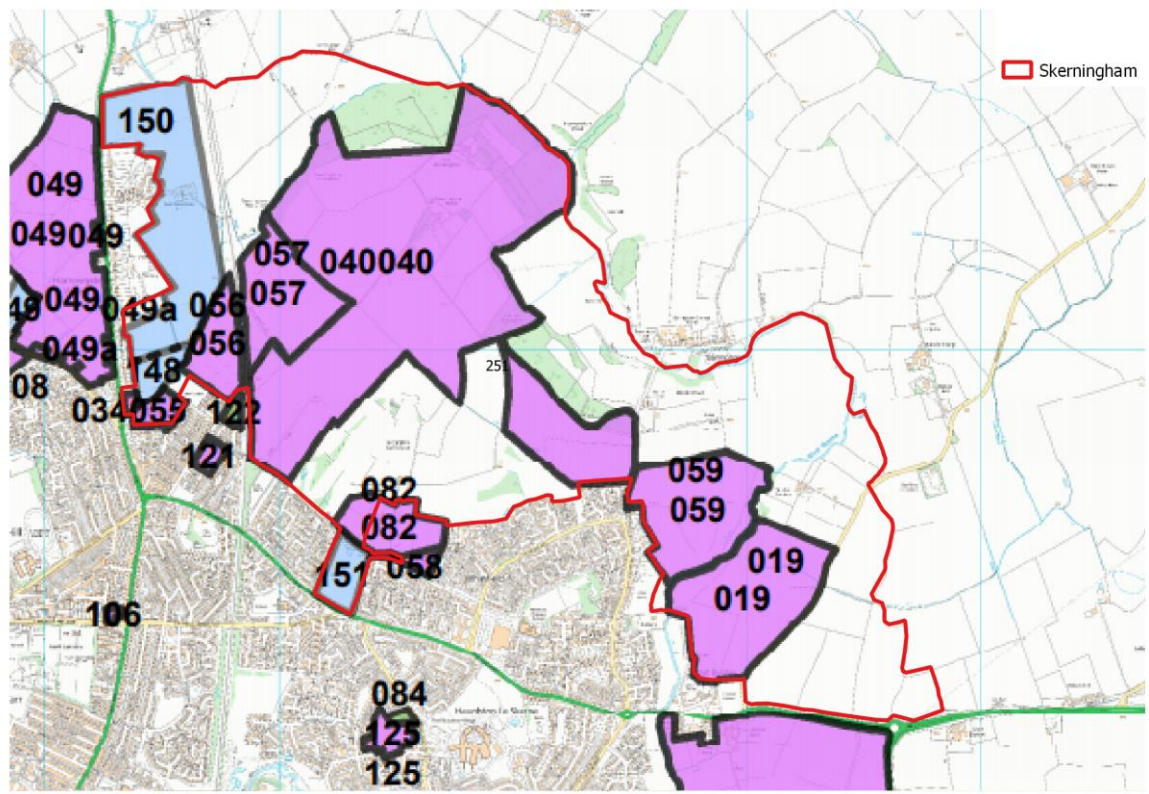
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ecological quality of the site and the need to protect and enhance existing features on site and ensure that they remain connected to broader ecological networks.

- c) The requirements of policy H10 are not strong enough to mitigate the impacts of allocation:
- Policy H10 and the associated Masterplan are expressed in vague and inscrutable terms. Although “higher densities” are to be required close to public transport routes and neighbourhood centres, the Masterplan does not specify ranges in dph or any other measure, nor are public transport routes shown on the map. The neighbourhood centre and other facilities are shown only as indicative locations.
 - There is no requirement for the development to be compact, legible and easily negotiable on foot, by public transport or bicycle. In fact, the masterplan indicates car-centric development: taking the form of discrete areas of inward-looking housing development severed from one another by swathes of green space, through some of which runs a local distributor road. The neighbourhood centre and schools are, likewise, severed from residential areas. The implication seems to be that residents would access the development, by car, along the distributor road from the A167 and A1160. It is likely to lead to car dependency and hence increased greenhouse gas emissions, air pollution and congestion.
 - No standards are set for the neighbourhood centre or other local facilities. Because of the extremely large size of the Skerningham site, and its fragmented layout, no neighbourhood centre could be within walking distance of more than a minority of residents.
 - H10 does not mention the need to address flood risk on the site and the Masterplan allocates land for development which is bisected by FZ3 or affected by surface water flooding (see map below).



Prior to the 2018 HELAA - which approved the Skertingham site - a 2015 SHLAA was carried out. This did not contain the Skertingham site, but it did assess several smaller sites within the area. Mostly, these sites were deemed unsuitable for development. The only parts of the broader site which were considered potentially suitable were Elm Tree Farm (site 82) and an adjacent small site, site 58. Site 59 (Muscar House Farm) was thought suitable for only 150 dwellings due to the potential transport impacts.



The current Skerningham site boundaries superimposed upon site boundaries in the 2015 SHLAA.

The development of the site would have the following impacts:

- Habitats: the Skerne corridor is one of the highest priority sites in the Borough. There are extensive areas of woodland on site, including the Skerningham Plantation SNCI (this is not noted on the Plan proposals map or in H10). There are extensive records of protected and BAP species on site¹. While H10 requires the River Skerne and its valley setting to be protected within the Masterplan, the construction of 4500 dwellings with some 10,800 inhabitants in close proximity to it would have serious impacts in terms of wildlife disturbance, damage to habitats and potential for littering and vandalism.
- Flooding: extensive areas of the site lie within Flood Zones 2 and 3 and there are significant pockets of surface water flooding.
- Heritage and archaeology: the following historic artefacts are listed in the Heritage Impact Assessment: several recorded prehistoric cropmark sites; the Grade 2 listed, 18th-century Skerningham Manor (NHLE 1185895); the historic settlements of Low Skerningham, Elly Hill, Low Beaumont Hill and Burdon Gardens; Skerningham deserted medieval village; a prehistoric settlement site; and a Second World War pillbox. The site also contains “linear features and enclosures.. an Iron Age sword findspot and a

¹ See the “Skerningham Wildlife” and Ecology Reports submitted as Appendices.



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Hanoverian gravestone, all of which suggest the area around the River Skerne was a focal point for early settlement.”

- Landscape: the Landscape Sensitivity Study found that the tranquility of the site was “particularly notable”. The northern part of the site, in particular, bore little relationship to Darlington. The site provided a background for Skertingham Manor and Low Skertingham, both Grade II Listed properties, together with historic mill buildings in Great Burdon.
- Transport: the SHLAA stated that the development of only part of the Skertingham site “would have major network implications (local and trunk road network).
- Amenity: Skertingham was described as the “jewel in the crown” of the PROW network in DBC’s 2014 ROWIP²; development here would destroy places of recreation value, including Skertingham Community Woodland. Some of the funding for this woodland creation was granted on condition that the woodland be maintained in the future, and this might have to be returned; the Forestry Commission could also refuse permission to fell the trees. Rail noise would affect the amenity of new residents.
- Infrastructure: An electricity transmission line and a water main cross the site. There is no sewerage in the area.

d) Very little evidence has been supplied to justify any of the roads proposed in the Plan.

Q4.7

- a) The site, although ostensibly adjacent to Darlington, is severed from it in all directions. To the south-west, there is a busy road, Rotary Way, then a series of suburban developments in an impermeable and illegible configuration. The only route into the centre of town is along West Auckland Road, a busy arterial road inhospitable to walkers and cyclists. To the south-east, there is Faverdale Industrial Estate, which also leads on to West Auckland Road.
- b) As with Skertingham, the risk is that an over-ambitious allocation of land for housing, particularly in a less sequentially preferable site, might lead to low demand and therefore might motivate DBC to relax environmental, social and other quality standards.
- c) H11 is lacking in the following respects:
 - As with H10, policy H11 is expressed in vague and inscrutable terms. “Higher densities” are not specified and active or public transport routes to key services are not shown in the Masterplan.
 - Again, sustainable transport is not supported by the layout of the development and there is no requirement for the development to be compact, legible and easily negotiable on foot, by public transport or bicycle. (Given the isolation of the site, good cycling and walking facilities within it would anyway be limited in value). Policy H11’s concerns regarding transport on this site are limited to the provision of roads, within and outside the site: “a link road between Rotary Way and Burtree Lane; enhancements to the local road network of Burtree Lane.” Again, the indicative masterplan shows discrete areas of inward-looking housing development severed

² <https://www.darlington.gov.uk/media/2386/rowip-v14-with-charts.pdf>



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from one another and from the proposed neighbourhood centre by swathes of green space. The implication, again, is this is a car-dependent development which will cause a large increase in traffic, greenhouse gas emissions, air pollution and congestion.

- No neighbourhood centre could be within walking distance of more than a minority of residents. No other local facilities are proposed. Many, if not most, people on the site would end up driving to access all services and facilities.

The 2015 SHLAA found that the site was unsuitable for development. No biodiversity study has been carried out, but development here would have the following impacts:

- Habitats: The site contains, at least, pockets of deciduous woodland and the course of West Beck.
- Flooding: The site has significant areas within Flood Zone 2 and 3, together with significant pockets of surface water flooding. The Masterplan does not appear to take this fully into consideration; H11 does not specifically mention the need to incorporate and address flood risk on the site.
- Heritage and archaeology: the site was described in the SHLAA as having “high archaeological potential”. The following historic artefacts are found on site: the remains of a 16th-century manor house at Whessoe Grange; the deserted mediaeval village of Whessoe; High Faverdale historic farmstead; and substantial areas of ridge and furrow.
- Landscape: the Landscape Sensitivity Study found the site to have “high-medium” landscape and visual sensitivity. “Development has the potential to overwhelm the rural character of this area, and could be highly visible due to its elevated nature.”
- Transport: Development here would have a significant impact on the strategic road network.
- Amenity: noise from adjacent transport corridors would affect future residents.

Q4.10

- a) These sites are severed from the town itself by an impermeable pattern of development and the Baydale Beck. There are few routes into the town, or to local facilities and services, that do not entail a dog-leg along Staindrop Road or Coniscliffe Road; there would be few facilities or services within walking distance of most of the area.
- b) The requirements of appendix B are insufficient to ensure mitigation of development impacts. For example, the development must provide “adequate” buffering to Baydale Beck and “pedestrian and cycle connections” but does not specify either. The need to manage surface water flooding is not mentioned.

The 2015 SHLAA found these sites (site 042) to be unsuitable for development. Despite the absence of biodiversity or heritage assessments, the following constraints can be identified:

- Parts of the site are in Flood Zone 2 and there are extensive pockets of surface water flood risk; Staindrop Road is susceptible to flooding.



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- The site borders the Baydale Beck, an SNCI; it is lined with deciduous woodland and water voles and otters have been present.
- The site provides local recreation opportunities for the people of Darlington and a rural setting for Merrybent Community Woodland.
- Development here would have “major highway implications”, in particular at junctions.
- A water main and electricity pylons cross the site and it is within the HSE Middle Zone due to its proximity to Broken Scar water works.

Q4.11

- a) The site is severed from the town by impermeable development to its west and by the route of the Skerne.
- b) Again, the requirements of appendix B serve to mitigate rather than obviate the impacts of development here, and are written in vague and inscrutable terms. The following constraints are found on site (although no biodiversity assessment has been carried out):
 - Parts of the site are within flood zones 3 and 2; there are also significant areas of surface water flood risk, especially in the west of the site.
 - The site contains parts of the River Skerne corridor, one of the key elements of the Borough’s ecological networks.
 - The site contains a WWII decoy site (a Scheduled Ancient Monument), instances of ridge-and-furrow earthworks, and other cropmarks which may date from the Iron Age.
 - HSE Intermediate Pressure Pipes, a water main and sewer run across the site. Residents here would be affected by road noise.
 - Development here would have “major implications” for the highway network.

Q4.12

- a) The site is adjacent to the village of Middleton St George. The very large allocations of housing land in this village, which would increase its population by some 53%, are contrary to policy SH.1, which states that development in Service Villages will be at a level to meet local needs. In Middleton St George, this would be 136 dwellings over the Plan period, rather than the 906 in the Plan. It contributes towards a dispersed and sprawling pattern of development that fosters car dependency.
- b) Again, the requirements of Appendix B are too vague to mitigate the impact of development. The 2015 SHLAA found it to be unsuitable for development due to its location. Despite the absence of biodiversity or heritage surveys, the following constraints are found on site:
 - Areas of surface water flood risk along the beck through the site and in pockets elsewhere.
 - Mature hedgerows and trees.
 - The site contributes to the settlement setting and provides local recreational opportunities.
 - Development here would require “significant” highway improvements.



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- A water main and sewer cross the site.

Q4.16

The figure of 600 dwellings on windfall sites over the Plan period is conservative. In between the 2018 and 2020 drafts, 7 sites (230 dwellings) were added as commitments, and 2 sites (49 dwellings) as allocations, to the Plan. Since then, 5 additional sites (122 dwellings) have received planning permission – a total of 401 dwellings, or 135 per annum. A better estimate for windfalls over the remaining 15 years of the Plan would be $135 \times 15 = 2,025$ dwellings.

Q4.17

The allocations of land in the Plan, if developed at a fairly low density of 35 dph, could accommodate 41,479 dwellings. As stated, there is no need to allocate any land at all.