
Darlington Local Plan Examination**Hearing statement prepared on behalf of Middleton St George Parish Council****Matter 4 Statement – Housing development
May 2021****1. Introduction and context**

- 1.1 This statement has been prepared by Jo-Anne Garrick Ltd on behalf of Middleton St George Parish Council (MSGPC). The parish council has made detailed representations at each stage of the preparation of the Darlington Local Plan (DLP). Furthermore, MSGPC engages fully in development management process, providing detailed comments on planning applications within and potentially impacting on the parish.
- 1.2 On 13 April 2021, MSGPC submitted the Middleton St George Neighbourhood Plan (MSGNP) to Darlington Borough Council (DBC) for examination. The plan has been subject to significant community engagement and substantial evidence work to inform the planning policy approach.
- 1.3 MSGPC 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 QuestionsCommitments (Q4.1 and Q4.2)

- 2.1 MSGPC does not have any detailed comments to make in response to questions Q4.1 and Q4.2, other than to highlight concern that as a result of the housing target being so excessive that it is questionable that there is a market for the level of housing and ability for the housebuilding industry to deliver it within the timescales identified by the council. For example, the council has suggested in response to PQ29, that site 146 – Land South of Railway, MSG is at an advanced stage of planning application process, which highlights the deliverability of the site. When in fact the reserved matters applications are only just being prepared. MSGPC therefore question whether this site could be delivered within the five-year period. Similarly, site 99 – Maxgate Farm is also identified as contributing to housing delivery in the five-year period, but this has not yet received planning permission.
- 2.2 MSGPC wishes to reserve the right to make further representations regarding these issues in so far as they may impact on the parish.
- 2.3 MSGPC fully supports the statements submitted by the Darlington Green Party and CPRE Durham with regards to housing commitments.

Methodology for selecting housing sites

Q4.3:

- 2.4 PPG (ID: 3-007-20190722) is clear that the process of the identification of sites should include parish council preparing neighbourhood plans. Whilst page 10 of the HELAA refers to parish councils, as described in the matter 1 hearing statement, no meaningful engagement was undertaken with MSGPC on the identification of housing sites. MSGPC also question the effectiveness of the methodology if the result is that the majority of development is proposed to take place in areas, such as Middleton St George, with the least number of services.
- 2.5 Section 11 of the NPPF is clear that planning policies should promote effective use of land in meeting the need for homes. Paragraph 117 states that strategic policies should accommodate objectively assessed needs in a way that makes as much use as possible of previously developed land. It is unclear from the site assessment process how this requirement was considered. Also, the focus, particularly in Middleton St George, of the development of executive and low-density housing does not make efficient use of land as required by the NPPF (paragraphs 122 and 123).
- 2.6 It is not clear from the methodology and approach of DBC how landscape sensitivity issues were considered through the site assessment process. It is noted that there was some landscape assessment for the larger sites, but no apparent consideration of the landscape impacts of the proposals for Middleton St George where a number of sites were proposed for development. This is a significant omission, especially as paragraphs 3.40-3.45, page 48 of the Darlington Landscape Character Assessment 2015 (SD35) highlights that the settlement edges around the southern part of Middleton St George and Middleton One Row display a higher sensitivity to residential development. There also appears to have been very little, if any analysis of the biodiversity value of each site.
- 2.7 MSGPC has previously expressed concern that the heritage impacts of sites in Middleton St George Parish were not fully considered, it is evident that the heritage impact assessment did not include a number of sites, including Maxgate Farm and land south of the railway line, nor is it clear how the Middleton One Row Conservation Area Character Appraisal informed the assessment process. Furthermore, as the strategic flood risk assessment work was undertaken in 2019, it is unclear how this informed the process.
- 2.8 Therefore, MSGPC consider that the approach for selecting housing allocations in the plan was not justified or consistent with national policy and guidance.
- 2.9 MSGPC fully supports the statements submitted by the Darlington Green Party and CPRE Durham with regards to the failings of the methodology for selecting housing sites.

Strategic and non-strategic housing allocationsQ4.4:

- 2.10 MSGPC does not have any specific comments to make in response to Q4.4 but wishes to reserve the right to make further representations regarding this issue in so far as it may impact on the parish.

Skerningham strategic site allocation - policy H10 (Q4.5 and Q4.6), Greater Faverdale strategic site allocation – policy H11 (Q4.7 and Q4.8), Elm Tree Farm housing site – ref 392 (Q4.9), Coniscliffe Park South and Coniscliffe Park North housing allocations – refs 41 and 249 (Q4.10), Great Burdon housing allocation – ref 20 (Q4.11)

- 2.11 MSGPC does not have any specific comments to make in response to questions Q4.1 to Q4.11 but wishes to reserve the right to make further representations regarding these issues in so far as they may impact on the parish.

Maxgate Farm, Middleton St George housing allocation – ref 99 (Q4.12)

- 2.12 MSGPC submit that the proposed Maxgate Farm housing allocation is not justified. As explained in the matter 3 hearing statement, policy SH1 states that service villages should accommodate a level of development to meet local needs. Middleton St George has been the focus of significant housing development over recent years. Since the start of the plan period 287 dwellings have been completed and a further 697 have planning permission. This, in addition to the Maxgate Farm site would result in a 50% increase in population of a parish of only 4,337 people. This level of development is not needed to meet local needs and is therefore contrary to the provisions of policy SH1 or the submission MSG Neighbourhood Plan.
- 2.13 Furthermore, it is considered that as a result of site constraints it is not appropriate for housing development. Constraints include: impact on historic assets (the Cades Roman Road), highways access, landscape, biodiversity, flooding and infrastructure capacity. MSGPC submit these issues were not fully considered at the site assessment stage.
- 2.14 With regards to highway capacity/ safety, MSGPC is concerned that the roads in the area, which were designed to support village traffic cannot cope with the ever-increasing demands from the new housing development from that which has been constructed as well as that which has been approved. The matter 1 statement explains that in 2019 traffic monitor data collected by the parish council illustrated that at the north of the village there were 1,685 vehicle movements per day and 1,704 to the south. The Maxgate Farm development is likely to generate in excess of 500 vehicles. MSGPC consider that Station Road and Middleton Lane will not be able to accommodate the extra vehicles, which would be in addition to the estimated 500 from the approved Sadberg Road and High Stell/ Grendon Gardens sites. It has been estimated that the overall total vehicle movements per day would be between 3,516 and 4,396 per day.

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- 2.15 MSGPC also have concerns that there is only one access to the site, off the road coming into the village from the A67. This has a 40mph speed limit and there are regular recorded incidences of drivers exceeding the speed limit. Also, the corner at the Platform 1 pub is a blind corner for both directions.
- 2.16 With regard to landscape impact, as explained in response to Q4.3, the site assessment process did not consider the cumulative impact of development within Middleton St George on the landscape character and setting of the villages within the parish.
- 2.17 MSGPC therefore consider that the plan should be modified to remove site 99, Maxgate Farm. If it is determined through the examination process that the allocation is necessary and justified, then MSGPC request that the allocation is supported by detailed policy guidance to ensure effective and managed delivery of the site as there is insufficient detail contained within appendix b of the draft local plan.

Blackwell Grange East housing allocation – ref 403 (Q4.13)

- 2.18 MSGPC does not have any specific comments to make in response to Q4.13 but wishes to reserve the right to make further representations regarding this issue in so far as it may impact on the parish.

Total supply from housing allocations – policy 2 (Q4.14 and Q4.15), windfalls (Q4.16), overall housing supply for the plan period – appendix A (Q4.17), five year housing land requirement and supply – policy H1 (Q4.18, Q4.19 and Q4.20), policy H1: if a five year supply cannot be demonstrated (Q4.21), small sites, custom and self-build housing (Q4.22 and Q4.23)

- 2.19 MSGPC does not have any specific comments to make in response to questions Q4.14 to Q4.23 but wishes to reserve the right to make further representations regarding these issues in so far as they may impact on the parish. It should also be noted that MSGPC support the submissions of Darlington Green Party and CPRE Durham in respect of these matters.