

Anne Rudkin

Representor Ref: 1171376

Written Statement in response to the following:

*Skerningham strategic site allocation (policy H10)*

**Q4.5. Is the proposal in policy H10 for the development of up to 4,500 dwellings; a neighbourhood centre; two primary schools, a secondary school, and other community facilities; roads and other transport infrastructure; and a network of green and blue infrastructure on 487 hectares at Skerningham justified? In particular:**

- a) Would the development be suitably located in the context of policy SH1?**
- b) Is there a reasonable prospect that the site will be available and could be viably developed at the point envisaged?**
- c) Subject to the modifications proposed by the Council, would the requirements of policy H10, along with other relevant policies in the Plan, be effective in achieving sustainable development on the site having regard to NPPF 72?**
- d) Does paragraph 6.10.10 need to be modified with regard to reference to a northern link road? Is the designation of a northern link road on the key diagram (map 1) and the Skerningham masterplan framework (figure 6.1) justified?**

4.5 a)

- Policy SH1 makes reference to the Town Centre being key to delivering the vision for Darlington as it is a highly accessible location and addresses some issues of local deprivation and poor housing. The Skerningham site in the Plan is not highly accessible and does not address these issues.
- Policy SH1 makes reference to sustainable transport provisions for those developments included in the Plan yet these are not clear in the Plan and we are consistently being told by the Council that these will form part of the planning application process. In my opinion this is not in the spirit of Policy SH1.
- Brownfield site regeneration is severely lacking in the Plan. Brownfield site developments should take precedence over green field sites and development around the Town Centre fringe would result in many brownfield sites being regenerated. The Council however have chosen to allocate 4,500 houses on a greenfield site.
- The loss of green space would cause significant harm to the character and appearance of the area, indeed the Darlington Landscape Character Assessment 2015 concluded that this area is unlikely to accommodate further development without altering its character.

- In the Rights of Way Improvement Plan this land was identified as the 'Jewel in the Crown' for Darlington Borough Council with access to very high grade 'quality countryside'. Perhaps what the Council actually meant by 'Jewel in the Crown' was how much money could be made from the destruction of this countryside.
- During Covid 19 this area has seen an overwhelming increase in the amount of people using this area for recreational purposes, which has continued even when lockdown restrictions have eased. It is an important area for recreational activities as well as helping to support the health and wellbeing of the residents of Darlington as a whole.

#### 4.5 b)

- I have grave concerns with regards to the viability of the scheme, in particular whether or not Skerningham Estates Ltd will be able to deliver upon it. The costs of the primary access road and ECML are substantial, and should profitability levels fall below 15%, which due to the sensitivity of the housing market it very well may do, then the deliverability of what has been put forward in the Plan is questionable.
- The primary road is not my only concern, the deliverability of other community services may also be impacted upon should profitability levels fall, in which case this development would not be sustainable.

#### 4.5 c)

- Policy H10 and the associated masterplan are vague and without any detail which would enable the reader to assess the site and make reasonable conclusions with regards to it. Sites for schools and community centres are only indicative and there is no mention of public transport links.
- The necessary infrastructure to support this site is not evidenced in the Plan. We are told by the Council that this will become evident in the planning application. National policy indicates that developments of this size should be supported by the necessary infrastructure. This is not evident in the Plan.

#### **Q4.6. Are the assumptions in the housing trajectory (appendix A) about the Skerningham strategic site justified, including that 1,650 dwellings will be completed by 2036? Has the Council provided clear evidence that development will begin in 2024 and that 90 dwellings will be completed by 2025**

- The masterplan for this site is vague and most decisions will not be made until a planning application has been submitted. Given the complexities of the site in relation to infrastructure and the timeframes involved in the planning application process it is unlikely that development will begin in 2024 and the Council have provided no evidence to suggest that it will.
- Skerningham is vehemently opposed by local residents who want to see proper infrastructure in place before any development begins, the Council have not

provided any details with regards to transport infrastructure or any mitigation for local road networks. This will also impact on the start date of the development.

- I would also like to raise the point that site assessments for Skerningham are still outstanding although they were supposed to be published the week commencing 19<sup>th</sup> April 2021, highlighting perhaps the complexities involved with this site.

*Elm Tree Farm housing allocation (ref 392)*

**Q4.9. Is the proposed Elm Tree Farm housing allocation, with an indicative yield of 150 dwellings, justified? In particular:**

- a) Would the development be suitably located in the context of policy SH1?**
- b) Would the requirements of appendix B, along with relevant policies in the Plan, be effective in achieving sustainable development on the site?**
- c) Are the assumptions in the housing trajectory (appendix A) about the site justified, including that that 150 dwellings will be completed by 2036? Has the Council provided clear evidence that development will begin in 2022 and that 90 dwellings will be completed by 2025?**

- Elm Tree farm will place an additional strain on already full to capacity services such as health and primary education within Whinfield. This, taken into account with the additional strain in the early years from the Skerningham development will impact severely not only on local services but on the local transport infrastructure as people will need to rely on cars to access health and education facilities further afield.
- Increased traffic congestion will lead to increased pollution levels.
- This development does not support the need for housing for an ageing population, as identified by the Council. The majority of this development is 3-4 bedroomed houses and is therefore not necessary to support the Council's housing needs.