

APFSQ2. Would the Council's proposed main modifications to policy H10, reasoned justification and masterplan framework (figure 6.1), along with the proposed changes to the policies map, ensure that the Plan is sound This document was classified as: OFFICIAL with regard to the development of the Skerningham housing allocation? In particular whether:

a) The key principles set out in policy H10 and proposed approach to the preparation of a design code and comprehensive masterplan, along with associated community consultation, would be effective in securing high quality development that reflects local aspirations in accordance with national policy relating to good design.

Para 127 of the National Planning Policy Framework states that "design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics'. Although the Policy H10 suggests that the masterplan for Skerningham should be prepared in consultation with the community, it does not say that its own design code will actually reflect local community aspirations. We would suggest that in order to comply with national policy the council should consider involving the community in its design code for Skerningham.

In relation to para 130 of the national policy Whinfield Residents Association do not believe that the comprehensive masterplan or the Council's design code will be effective in securing the majority of points in para 130. It will destroy the existing quality of the area, not only due to the loss of recreational land and existing woodland, green spaces and natural habitats, but it will impact significantly on the surrounding area in terms of additional traffic and additional pollution. We fail to see how the masterplan or design code will promote health and well being as they are remote from the town centre and the development is heavily vehicle dependent in terms of accessibility.

It is interesting to note in para 131 places an emphasis on trees including ensuring all new streets are tree lined and measures are in place to retain existing trees where possible. Policy H10 however, does not place any such emphasis on trees, merely stating that they will be retained if they contribute to the landscape character. We would suggest that this does not exactly fit in with the importance that trees are afforded in national policy.

Para 135 makes reference to ensuring that the quality of approved development is not materially diminished between permission and completion as a result of changes being made to the permitted scheme. In order to secure high quality development on a scheme of this size, Whinfield Residents Association feels that some reference should be made in the local plan to ensure that this will not be the case. We feel that there is a real risk that should circumstances change for this development, for eg the housing market declines, or anticipated funding does not become available, changes may be made that will materially diminish the quality of the development, for eg the local distributor road may not be completed or schools and other community provisions may not be provided which will then increase the pressure on existing community provisions.

We would like to think that the Council and the developers will pro-actively engage with us and the community in developing both a masterplan and a design code, as per the principles of NPPF section 12, however, given the lack of community consultation so far on the proposals for Skerningham, and the fact that the Council have ignored concerns that the community have already raised in relation to the proposed layout of the development, we feel that this in itself is just an aspiration for us as a community.

b) Policy H10 (including the requirements relating to an infrastructure phasing plan; review mechanism prior to the occupation of the 1,650th dwelling; schools and other community facilities (parts b and d); offsite highway works (part f); local distributor road (part g); and green infrastructure (part j)) would be effective in securing the provision of all necessary infrastructure in a timely manner that is appropriately coordinated with the housing development up to and after 2036.

Whinfield Residents Association does not consider that the main modifications to the plan would be effective in securing the provision of all necessary infrastructure in a timely manner. We refer in particular to the main modification in part (g) stating that prior to the occupation of between the 200th and 450th dwelling on land to the east of the allocation boundary the section of the local distributor road between Barmpton Lane and Bishopton Lane shall be delivered. Our main concerns are as follows

- There is no timescale for delivery in terms of months or years, it is purely related to occupation of dwellings. This does not ensure effective delivery in a timely manner as no timescale's have been proposed or suggested.
- If there is a decline in the housing market, there is a real risk that occupation of the 450th dwelling may not take place for many years and this will, as has been demonstrated by the Council in their own traffic assessment findings mean a potential increase of traffic on Barmpton Lane of up to 144%
- An increase of up to 144% in traffic levels on Barmpton Lane will, in our opinion pose a safety risk to both vehicle users and pedestrians alike.
- There is no mention in Policy H10 of access for site traffic, which in our opinion is also necessary infrastructure to develop the site.
- The provision of a local distributor road is supposed to help to reduce the burden of the development on the existing local road network which is already full to capacity, and therefore make the development more feasible in terms of having the appropriate infrastructure – however, upon examination of DBC16 Appendices' D and E it is clear that to access Darlington town centre, most vehicle users will use Barmpton Lane as it is the shortest route. They will not go out of their way to use the local distributor road. This also begs the question of whether or not public transport providers, who are profit driven, will also do the same! We would therefore suggest that the main modifications still do not provide all necessary infrastructure for the development.
- We consider that the paragraph 'Precise details of the road and development access points, together with a timetable for its implementation, shall be agreed with the Council as part of the comprehensive masterplan, infrastructure phasing plan and any future planning applications for the site' is not effective or helpful in securing the provision of the necessary infrastructure in a timely manner. Instead it suggests that what has been referred to in Policy H10 may be subject to change in the masterplan, which hasn't yet been decided. So access points referred to in Policy H10 may well change again.

We would also like to make reference to part (f), especially given our comments above. Even though Barmpton Lane has been included as a principal vehicular access point no measures have

been included within the plan to modify it. Given that access to the initial development phase is from what is currently a narrow national speed limit road, and the fact that it is highly likely that Barmpton Lane will continue to be a principal access point rather than the local distributor road, we do not consider this to be adequate or appropriate access and would at least expect to see mitigation measures required as part of this Plan.

The final paragraph of the modified Local Plan (DBC22) states the following 'Prior to the occupation of the 1,650th dwelling, the Council and the developers shall undertake a review of all associated infrastructure requirements for the subsequent phases of the development up to 4,500 dwellings. Those identified infrastructure requirements shall be incorporated into an updated infrastructure phasing plan and delivered as part of subsequent phases of the development.' The Local Plan is proposing to secure the delivery of up to 4,500 dwellings but Policy H10 only really considers 1,650 dwellings with a little add on at the end saying they will consider the rest of the development at a later stage. We do not see this as being an effective way to secure the necessary infrastructure for the development after the 1,650th dwelling or 2036.

One final point we would like to raise in relation to securing the necessary infrastructure is with regards to the Central Park development in Darlington. The masterplan for this scheme was prepared in 2012 and included 350 dwellings. According to the council's website, to date 170 dwellings have been built – in approx 9yrs. We would therefore question the deliverability of 1,650 + dwellings in 15yrs on the Skerningham site and also the necessary infrastructure to support it.

c) The proposal for up to 4,500 dwellings and associated transport, community and green infrastructure could be viably delivered without the relocation of the golf course. If necessary, the viability evidence provided by the Council and Skerningham Estates Limited should be updated to inform consideration of this question.

We would welcome updated viability evidence on whether this development could be viably delivered without the relocation of the golf course. In particular we would also ask whether or not this development is viable within the time period of the Local Plan (ie up to 2036 with the delivery of 1,650 dwellings).

We would ask whether or not the viability studies take into account the Garden Village status of the development and have therefore included potential funding available as part of this status in assessing the viability of the development?

We are concerned that should the size of the development be reduced due to the golf course not relocating then potentially not only will revenues be lost from the reduction in sales, but potentially will revenues be lost from reduced funding availability due to the Garden Village now being of a smaller size than originally stated in the Garden Village application. Will this ultimately affect the viability of the site?

The Council's response in AP23 states that if the golf club were to remain in situ then this would lead to an increase in the level of green infrastructure on the masterplan area. If the golf club does not agree to sell then how can it be part of the masterplan? Surely the masterplan can only refer to areas over which the developer has control?

We would also ask why, given that the Local Plan has taken nearly 5 years to develop, no definitive answer can be given on whether or not the golf course will be located? Surely the Council has contacted the golf course owners to ensure that this land can be included as part of the

Skerningham development, and if they have not, then one would question why they are actually putting it forward in the Local Plan if they do not know if the golf course is willing to locate? The Council must, in our opinion, either produce a Local Plan where there is certainty that the golf course will relocate, and if there is not certainty then the Local Plan should be based upon no relocation of the golf course. At present we are in limbo!