

## Comment

<b>Consultee</b>	Miss Kim Binks (1300179)
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<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Miss Kim Binks (1300179)
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<b>Version</b>	0.3
<b>Question 1</b>	

<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
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<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM17, MM23, MM24, MM35
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### Question 2

<b>What best describes the nature of your representation?</b>	Object
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### Question 3 Legally Compliant and Sound

<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	No
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<b>Do you consider the Plan, incorporating the proposed Modification is Sound?</b>	No
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### Question 4

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be**

**as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

• MM17 (Policy DC3): –No robust case for proposal to increase threshold (from 100 to 150) for developments to provide a Health Impact Assessment. • MM23 – Policy H1 – Policy wording: –DBC proposal is to add the word “minimum” (i.e. reference to setting out minimum housing numbers for neighbourhood plan areas. The Local Plan ought to have regard to the National Planning Policy Framework (NPPF) which, although it requires minimum numbers at the local authority level, NPPF paragraph 66 does not refer to minimum in the context of neighbourhood plans. The number of homes required should be informed by the independent objectively assessed Housing Needs Assessment in the Neighbourhood Plans, and some reference should be made to this in the Local Plan. • MM24 – Policy H1 – Table 6.1: -The very significant increase in the figure given for Middleton St George, and the wording of the justification for it against policy H1 (housing) – “the requirements are based on the number of dwellings that are expected to be built on housing allocations and commitments in that neighbourhood area between 2021 and 2036” – shows that these figures are not based on need. Whilst the NPPF requires minimum numbers at the local authority level, paragraph 66 does not refer to minimum in the context of neighbourhood plans. Table 6.1 be amended to ensure the neighbourhood area housing requirements have been identified in response to the needs of the area, rather than as a result of development pressure. • MM35 – Policy H2 – table 6.3 Housing Allocations: -The inclusion of site 99 (Maxgate Farm) is not required in order to make the Plan sound. The issue of over allocation of housing sites has not been addressed. It should therefore be removed from the Local Plan. Overall the excessive development of Middleton St George over recent years have had a detrimental effect on the village that can not be measured by a planning inspector. The village and other villages now face unnecessary pressure to take their share of the new housing allocations that are needed over the next 15 years. To further expand we should look to be creating new areas of town on brownfield sites to preserve the quality of life for those living in places that cannot cope with constant development.

#### **Question 5**

**Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.**

• MM17 (Policy DC3): –No robust case for proposal to increase threshold (from 100 to 150) for developments to provide a Health Impact Assessment. **Threshold should remain 100.** MM24 – Policy H1 – Table 6.1: - The very significant increase in the figure given for Middleton St George, and the wording of the justification for it against policy H1 (housing) – “the requirements are based on the number of dwellings that are expected to be built on housing allocations and commitments in that neighbourhood area between 2021 and 2036” – shows that these figures are not based on need. Whilst the NPPF requires minimum numbers at the local authority level, paragraph 66 does not refer to minimum in the context of neighbourhood plans. **Table 6.1 be amended to ensure the neighbourhood area housing requirements have been identified in response to the needs of the area, rather than as a result of development pressure. Housing allocations if necessary for the whole of Darlington borough should be created in more sustainable areas to make the plan sound.**