

Comment

Consultee	Ms Kendra Ulliyart (1250867)
Email Address	[REDACTED]
Company / Organisation	Darlington Friends of the Earth
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod736
Response Date	23/11/21 12:17
Status	Processed
Submission Type	Email
Version	0.3
Files	FoE- Local Plan- MM191-Objection-PDF.pdf
Question 1	

Which document/modification does this representation relate to?	Main Modification Schedule *
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* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM191
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Question 2

What best describes the nature of your representation?	Object
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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.

The removal of 403 as a Local Wildlife Site is inconsistent with the Council's Local Plan Policy ENVIRONMENT p 121 Para D: *Local Nature Reserves and Local Wildlife Sites*

- . Site 403 is central to the thriving and survival of meta-populations and a stepping stone for feeding and migration of Great Crested Newt population
- . Site 403 It is listed with the other wildlife site in the Borough in the *Tees Valley Nature Partnership*
- . Site 403 is acknowledged in the DBC Sustainability Appraisal Document
- . Development of 403 is inconsistent with National Planning Policy Framework (*NPPF Revised July 2021*) ie there should be no development

Biodiversity refers to describes the “*variety of plant and animal life in a particular habitat, a high level of which is usually considered to be important and desirable.*”

- . 403 is a biodiverse site and cannot be “*de-biodiversed*”
- . Its removal sets a precedent for the other Local Wildlife sites in the Borough including the adjacent Wildlife Sites on the Parkland and former Orchard area of the Grange.
- . Darlington FoE has interest in all of the Local Wildlife Sites of the Borough. The loss of this Local Wildlife Site is viewed as unacceptable and unsound.

Please find Darlington friends of the earths full submission concerning MM 191

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.

n/a

Comment

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Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod738
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.7
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM14
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
Do you consider the Plan, incorporating the proposed Modification is Sound?	No
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.

- The Skertingham Garden Village does not need to be allocated. The objectively assessed housing requirements for the Local Plan period have already been outstripped by nearly a third, considering completions since 2016, commitments and windfalls. Even if the vastly inflated housing figures in the Plan are accepted, the Skertingham Village development would still be surplus to requirements.
- Further the proposed Skertingham Garden Village development will be very remote to the town centre, rail station and major employment areas. By its very nature this makes it inevitably a car dependent development. This does therefore not contribute towards achieving the national commitment of net zero carbon and greenhouse gas emissions by 2050. See MM74, MM75 and DC1 5.1.8 below.
- Climate Change needs to be at the forefront of this Local Plan and how it will meet net zero carbon and greenhouse gas emissions by 2050. This local plan needs to be carbon audited to be legally sound.

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.

- The Skertingham Garden Village does not need to be allocated.
- Climate change needs to be at the forefront of this Local Plan and how it will meet net zero carbon and greenhouse gas emissions by 2050. The Skertingham Garden Village proposals are unnecessary, unsustainable and should be removed from the Local Plan.

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod740
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.5
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM61 and MM62
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
Do you consider the Plan, incorporating the proposed Modification is Sound?	No
Question 4	

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- The Council's own transport studies clearly show that the impact on the local transport network, particularly Barmpton Lane, Whinbush Way and Whinfield Road may result in up to 5,437 extra vehicles a day using the local transport network.
- Whilst the plan looks to mitigate the impact of this development on these roads it does not provide the detail on how this will be done. Instead, there is reference to it forming part of a masterplan, but again there are no published details. It is therefore impossible to comment upon soundness and sustainability when no details on how the impact will be mitigated are available?
- The Northern Link Road was promoted as necessary to help mitigate the pressures on the A1150 which is now operating close or often at capacity at peak times. The Northern Link Road is not necessary for the Plan, but the proposed Skerningham development plus other local developments will increase traffic on the A1150 and the surrounding local roads. The Council, in its bid to obtain funding for the Darlington Northern Link Road even acknowledged the A1150 is nearly full to capacity. How then is the additional traffic from the proposed Skerningham development sustainable?
- Climate Change needs to be at the forefront of this Local Plan and how it will meet net zero carbon and greenhouse gas emissions by 2050. This local plan needs to be carbon audited to be legally sound.

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- Improved detail regarding the mitigating measures / infrastructure interventions for Barmpton Lane/Whinbush Way and the A1150 to provide consistency with the NPPF so that impacts are shown to be addressed.
- Climate Change needs to be at the forefront of this Local Plan and how it will meet net zero carbon and greenhouse gas emissions by 2050. This local plan needs to be carbon audited to be legally sound.

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMMod742
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.3
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM65 and MM66
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
Do you consider the Plan, incorporating the proposed Modification is Sound?	No
Question 4	

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- A community woodland and wildlife friendly spaces, public footpaths and recreational facilities already exist in Whinfield and Skertingham. Why can these not be incorporated into the development rather than being destroyed to make way for it?
- The proposed Skertingham development and the infrastructure needed to support it is likely to have a damaging effect on the biodiversity in this area, particularly farmland birds. There is a considerable danger that these species will be lost, not just displaced (or moved) if the Skertingham development proceeds as planned. A full assessment should be detailed together with any mitigation proposals so that the development impact can be considered.
- Indeed, there are no mitigating measures in the plan for farmland birds, many of which are on the Red and Amber lists of conservation concern. Many have declined or disappeared already from areas where development has taken place within the borough. There needs to be an assessment to show the potential impact that major housing proposals will have on biodiversity and their consistency with Policy ENV 7.
- The Environment Bill includes a requirement for all new planning consents to include a condition requiring a 10% biodiversity net gain. In other words, those building need to demonstrate an uplift in biodiversity on or near the site, enhancing natural habitats to create lasting benefits both for wildlife and for people. It is not clear in the Plan how this will be achieved for the Skertingham Village development.
- It is not clear how the Skertingham housing proposals will impact on the River Skerne Strategic Corridor and the Durham Wildlife Trust Brightwater Programme.
- An assessment to calculate an increase in carbon emissions due to the loss of carbon sinks such as farmland, trees, and hedgerows for their entire lifetime.
- The ecological emergency demands a Local Plan that puts nature first in planning and 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.

- An assessment to show the potential impact the major housing proposals at Skertingham and Coniscliffe Park will have on biodiversity and their consistency with Policy ENV 7.
- An assessment to calculate increased carbon emissions due to the loss of carbon sinks such as farmland, trees, and hedgerows over their entire lifetime.
- Skertingham and Coniscliffe are the largest sites proposed in the Plan. These proposals require full consideration now and the Council needs to establish how, if the proposal goes ahead, there will be a 10% Biodiversity Net Gain as required in the Environment Bill.
- This plan requires carbon auditing to see if it is compliant with the carbon reductions needed to achieve carbon neutrality by 2050

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod743
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.2
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM74 and MM75
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
Do you consider the Plan, incorporating the proposed Modification is Sound?	No
Question 4	

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- Should the Golf Club remain in situ then it is obvious that Skertingham will instead become isolated pockets of development either side of the Golf Club.
- How then can a neighbourhood centre be firmly established as neighbourhoods would be split leading to more car dependency? This does nothing to meet the NPPF's requirements of sustainable development and improving the environment. See MM14 above and DC1 5.1.8 below.

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- A review of the plan to ensure that should the golf club not be relocated then the development will still meet the needs of the National Planning Policy Framework in relation to the impact on the environment from a fragmented development which is car based and the sustainability of the development with a neighbourhood centre not really centre to the development.
- The Skertingham Garden Village does not need to be allocated. Climate change needs to be at the forefront of this Local Plan and how it will meet net zero carbon and greenhouse gas emissions by 2050. The Skertingham Garden Village proposals are unnecessary, unsustainable and should be removed for the plan to be legally compliant and sound
- Climate Change needs to be at the forefront of this Local Plan and how it will meet net zero carbon and greenhouse gas emissions by 2050.

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Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod744
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.4
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM132
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
Do you consider the Plan, incorporating the proposed Modification is Sound?	No
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- The Local Plan needs to be strengthened to protect hedgerows in development areas. Hedgerows are valuable to people and their local historic landscape. They link to wildlife sites and capture carbon, yet developers are allowed to remove them. Old hedges cannot be replaced but in circumstances that gaps have occurred developers need to replant and replace them. The 1987 Hedgerow regulation is not being upheld in this Local Plan.
- Paragraphs 9.4, 9.5 and 9.6 refer to Green Corridors. We welcome this but would like more specific detail of what a green corridor is, recommended features, minimum widths and how it can be protected.

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- This plan requires carbon auditing including an assessment to show what the potential impact of hedgerow losses over their lifetime at Skertingham and Coniscliffe Park will have on biodiversity, climate change and flooding in consistency with Policy ENV 7.
- The Local Plan required strengthened protection for hedgerows in development areas. The 1987 Hedgerow regulation needs to be upheld in this Local Plan and a new Hedgerow Protection Policy established across the Borough.
- Improved detail regarding green corridors.

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod751
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.3
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM132
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
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Why was this entire section removed? Local Green Spaces are a relatively new designation. The national planning policy indicates they should be close to the community they serve, be local in character and have significance because of attractiveness, heritage, recreational or biodiversity value, not be extensive in size and complement investment in homes, jobs, and essential services. Their primary role is to maintain openness and permanence of the landscape. Local green spaces are important to local people, their well-being and wildlife.

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Re-instatement of the Local Green Space section ENV3 E9.3.5 that was removed.

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMod773
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.4
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM14
Question 2	
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DC1 5.1.8• The Local Plan contains an aim for net zero by 2050. What are the interims aims for 2030 and 2040?

- Climate change must be at the forefront of all planning decisions. The NPPF emphasises that responding to climate change is central to the economic, social, and environmental dimensions of sustainable development. This plan falls short in terms of targets and encouraging car dependent development. This plan does not therefore contribute towards achieving the national commitment of net zero carbon and greenhouse gas emissions by 2050. See MM14, MM74 & MM75 above.
- The Local plan recognises the climate emergency but not the ecological emergency we face

Question 5

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- This Local Plan needs to be carbon audited for it to be legally compliant.
- The Local Plan needs to recognise to ecological emergency we are in.

Comment

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Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Friends of the Earth (Ms Kendra Ulliyart - 1250867)
Comment ID	DBLPMMod787
Response Date	29/11/21 12:29
Status	Processed
Submission Type	Email
Version	0.2
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM182 and MM185
Question 2	
What best describes the nature of your representation?	Object
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	No
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DC3 Coniscliffe Park North and South. • These proposed developments of up to 1,520 houses with indicative yields of 1,050 dwellings during the plan period and the infrastructure needed to support it is likely to have a damaging effect on the biodiversity in this area. A full assessment should be detailed together with any mitigation proposals so that the development impact can be fully considered. • Indeed, there are no mitigating measures in the plan for farmland birds, many of which are on the Red and Amber lists of conservation concern. Many have declined or disappeared already from areas where development has taken place within the borough. There needs to be an assessment to show the potential impact that major housing proposals will have on biodiversity and their consistency with Policy ENV 7. • The simple fact is that if this development goes ahead, the habitat for many species will be lost. Any green or blue infrastructure provided will not be an “onsite” replacement that will be suitable for these species. There is a need for mitigation or compensation under Paragraph 32 of the NPPF and enhancing biodiversity under Paragraph 170d. • The Environment Bill includes a requirement for all new planning consents to include a condition requiring a 10% biodiversity net gain. In other words, those building need to demonstrate a uplift in biodiversity on or near the site, enhancing natural habitats to create lasting benefits both for wildlife and for people. It is not clear in the Plan how this will be achieved for this site. • Development including any supporting infrastructure at Skertingham, Faverdale and Coniscliffe will involve considerable land take i.e., all the way from the Tees to the west of the Urban Area around the whole of the north of Darlington to the A66. There is likely to be a substantial biodiversity loss across this area. Whilst the Plan refers to a need for comprehensive planning there are no published details. It is therefore impossible to comment upon soundness and sustainability on how the impact of each development will be mitigated. • Baydale Beck that runs along the southern boundary of the site is ancient woodland and requires protection from damage and trampling.

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• Skertingham and Coniscliffe are the largest sites proposed in the Plan. These proposals require full consideration now and the Council needs to establish how, if the proposal goes ahead, there will be a 10% Biodiversity Net Gain as required in the Environment Bill. C • Requirement for protection of ancient woodland at Coniscliffe Park