

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod195
Response Date	24/11/21 09:38
Status	Processed
Submission Type	Web
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	MM6, MM8, MM25, MM30, MM37
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.

We are pleased to note that the housing figures given in the Plan have been amended for consistency.

There is one apparent error: MM30 states that the total number of dwellings in the Plan is 14,836. Figures given elsewhere in the Plan, however, total 14,497 (3119 commitments and 5764 allocations plus 5,614 allocations outside the Plan period).

The fact that the total number of dwellings allocated in the Plan has gone down since the first draft manifests the fact that dwellings have moved from "allocation" to "commitment" and from "commitment" to "delivered". This in itself continues to undermine the case for more large-scale building: since the Plan period has already started, and since houses have already been built, it doesn't make sense to re-set the balance to zero. The figure given for housing delivery within the Plan period, therefore, should include dwellings already constructed since 2016.

The greatest failing of this modification is, of course, that it continues to propose a vastly inflated quantity of housing. As we have previously argued, this was justified via the rejection of the Government's standard methodology for calculating housing need, and the use of some very questionable statistics and analytic methods to come up with a "housing requirement" far in excess of what is actually needed.

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 Plan figures should be amended again for consistency, although this will not be sufficient to make the plan sound as the figures are based on inaccurate evidence and methodology.

Comment

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Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod196
Response Date	24/11/21 09:40
Status	Processed
Submission Type	Web
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	MM9 and MM14
Question 2	
What best describes the nature of your representation?	Support
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	Yes
Do you consider the Plan, incorporating the proposed Modification is Sound?	Yes
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.

We applaud the Plan's recognition of the fact that, by law, Local Plans must support the national commitment to net zero carbon emissions by 2050. However, it is inappropriate for it to do so without very significant changes to its strategy, which at present mandate low-density, car-dependent sprawl and a new orbital route around the town.

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.

We do not object to these modifications as such. We simply argue that the Plan's strategy is not compatible with them.

Comment

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod197
Response Date	24/11/21 09:42
Status	Processed
Submission Type	Web
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	MM11, MM13, MM51
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.

We are pleased to see additional mention of the Design of New Development SPD and its successors. We have some concern about the apparent downgrading of its significance, such that new development need only “have regard” to it rather than “following” it; the Plan, and decision-making, should ensure that this change does not result in a reduction in standards.

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.

We are not comfortable with the apparent downgrading of the SPD's significance. The Plan text, and decision-making, should be amended to make it clear that all new development will be expected to follow the highest standards of sustainable design.

Comment

Consultee	Mrs Jo Ellis (1250913)
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Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod198
Response Date	24/11/21 09:45
Status	Processed
Submission Type	Web
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	MM23
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.

We are concerned about the addition of the word "minimum" to this Policy, and the justification which states that the housing figures should not be seen as a "restrictive maximum". The point of planning is to ensure that the right quantity of development occurs in the best places for it, balancing the benefits of development against its environmental and other impacts. If the philosophy of the local authority is that there should be no limits to development, it is failing to take into consideration these impacts and is therefore failing to plan effectively.

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 Plan should acknowledge that too much development, or development in the wrong place, can be a failure of planning. The phrase stating that the housing figures should not be seen as a "restrictive maximum" should be removed; planning is supposed to be restrictive. In fact it has no other weapons in its armoury.

Comment

Consultee	Mrs Jo Ellis (1250913)
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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod200
Response Date	24/11/21 09:47
Status	Processed
Submission Type	Web
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	MM24, MM25 (neighbourhood area housing allocations), MM27
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.

We are pleased to see that neighbourhood area housing figures have been amended for consistency; but the very significant increase in the figure given for Middleton St George, and the wording of the justification for it against policy H1 – “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.

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 neighbourhood area housing allocation for Middleton St George should be amended to reflect a level compatible with housing need in the village.

Comment

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod202
Response Date	24/11/21 09:49
Status	Processed
Submission Type	Web
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	MM31 and MM37 (small sites)
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.

We are pleased to see the addition of a “small sites allowance” for small windfall sites to the housing calculations, acknowledging that dwellings will be built on sites which are not within the current Plan. However, as we have previously argued, the figure is far too low. Firstly, as the text admits, the average number of dwellings permitted each year in developments of less than 10 units is 37, not 25. The text of MM37 acknowledges that the “small sites allowance” is lower than the number of dwellings on windfall sites (the figure it gives for the latter is 37 dwellings p/a, which is still much lower than reality). It seems to present this discrepancy as a good thing. Once again, the wording of the Plan manifests an ethos within which limits to development are seen as a bad thing, and the environmental or other impacts of development are disregarded. Secondly, and rather more importantly, no allowance has been made for windfall developments on sites of over 10 units. (The last sentence of MM37 refers to no allowance for windfalls over one hectare, which is a category not referred to in earlier drafts of the plan.) This is not justifiable, because there is a consistent pattern of delivery on these sites over the past few years. 329 dwellings were permitted on windfall sites over in between the 2018 and 2020 drafts; another 119 dwellings were permitted on windfall sites in between 2020 and 2021 – that is, on average, 149 dwellings per annum. The correct figure for windfalls per annum, therefore, ought to take into account the pattern of delivery on both categories of site. That is, the Plan should assume delivery of 37 dwellings per annum on windfall sites of less than 10 units and 149 on larger sites – a total of 186 dwgs per annum.

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 "small sites allocation" should be amended to read 37 rather than 25, and an allocation for larger windfall sites of 149 dwellings per annum should be made.

Comment

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod203
Response Date	24/11/21 09:51
Status	Processed
Submission Type	Web
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	MM44, MM45
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.

We are concerned about the apparent discrepancy between the identified need for affordable housing (47.2% of all dwellings) and the policy requirement (10%).

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.

If the identified need for affordable housing is 47.2% of all dwellings, then the Plan should provide for 47.2% of new dwellings to be affordable.

Comment

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Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMOD209
Response Date	24/11/21 10:01
Status	Processed
Submission Type	Web
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	MM54 - MM82
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.

These would be, for the most part, reasonable amendments to make to the policy dealing with Skertingham, if the allocation of the site could be justified. We are pleased to see the prioritisation of development to the west of the East Coast Main Line; more stringent requirements regarding phasing and the delivery of facilities and services; the specific requirement for cycling and walking links to be connected to established networks; the removal of references to the Northern Link Road; more stringent requirements regarding avoidance of flood zones and the protection of biodiversity and heritage; and clarification regarding the application of policies TC1, TC4 and TC5 to the proposed Neighbourhood Centre. We have grave concerns about the proposals with reference to the relocation or otherwise of the golf club. The proposed indicative masterplan for the Skertingham site, should the golf club remain in situ, shows a ribbon of development to the north of the golf club, with pockets of development either side of it; it does not show a single cohesive development which could adequately be served by one neighbourhood centre or by one or two primary schools. Therefore MM74 and MM75 should not be retained in the Plan, because if the golf club does not move, the Skertingham development as described in the Plan cannot reasonably be delivered. Most importantly, though, these modifications cannot negate the fact that the Skertingham site does not need to be allocated. As we have previously said, the objectively-assessed housing requirement for Darlington Borough over the Plan period has already been outstripped by almost a third, taking into account completions since 2016, commitments and windfalls in between 2020 and 2021; and even if the vastly inflated housing need figures in the Plan were accepted, the Skertingham site would still be surplus to requirements, because of the very large quantity of development elsewhere. Furthermore, the modifications do not go far enough to address the concerns that we have previously raised over the design and layout of the scheme, which seems likely to generate a low-density, car-dependent development, and the lack of connectivity between most of the site and the rest of the urban footprint.

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 Plan should not make provision for the revised version of the Skertingham scheme, without the relocation of the golf course. This would constitute a series of sprawling and disconnected pockets of development without cohesion or functionality. As we have previously argued, the scheme should not go ahead. Even if the inflated housing figures proposed in the Plan were justified, which they are not, the scheme would still be surplus to requirements.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod212
Response Date	24/11/21 10:03
Status	Processed
Submission Type	Web
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	MM83 – MM102
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.

Again, these would be, for the most part, reasonable amendments to make to the policy dealing with Faverdale,, if the allocation of the site could be justified. We are pleased to see more stringent requirements regarding phasing and the delivery of facilities and services; the specific requirement for cycling and walking links to be connected to established networks; more stringent requirements regarding avoidance of flood zones and the protection of biodiversity and heritage, including the Stockton and Darlington Railway; the commitment to develop a Greater Faverdale Design Code; and clarification regarding the application of policies TC1, TC4 and TC5 to the proposed Neighbourhood Centre.

We have previously argued that the Faverdale site is surplus to requirements, and maintain that belief; that being so, we are bound to argue that the modifications cannot be sufficient to make the plan sound, since the Faverdale allocation per se cannot be justified. Furthermore, the modifications do not go far enough to address the concerns that we have previously raised over the design and layout of the scheme, which seems likely to generate a low-density, car-dependent development. However, we believe this site to be sequentially preferable to the Skerningham site, because of the latter's particular importance for landscape and recreation, and because of its lack of connectivity.

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.

In general, we are pleased to see these modifications, although we do not think that they go far enough.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod214
Response Date	24/11/21 10:05
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Which document/modification does this representation relate to?	Policies Map Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM130, MM133, MM134, MM135, PM2, PM3.
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.

We are pleased to see the addition of green infrastructure assets to the Policies Map. However, we are deeply concerned about the fact that green corridors, existing and new, are simply defined as dotted lines on the map. The justification for this is that “they are distinct, and [their width] will vary along the length of each corridor depending on its qualities, characteristics and surroundings in any particular location.” That being so, they should have been properly mapped at the start of the Plan process; it is not possible to protect a spatial asset which is not adequately defined. As an illustration of this, para 9.4.6 states that “Development proposals on sites crossed by, or adjacent to a strategic or local green corridor should positively protect, incorporate and enhance the functions and features of the corridor.” But if the dimensions of that corridor are not defined, the only sites which are adjacent to a green corridor are those which run up against its centre line; and any “functions or features” which operate or exist beyond that centre line cannot definitely be said to be within it.

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 Green Corridors should be properly defined on the map as polygons rather than green lines. The precise dimensions of each corridor should be shown, so that there is a definitive answer to the question of whether a feature lies within a corridor or not.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod215
Response Date	24/11/21 10:06
Status	Processed
Submission Type	Web
Version	0.1
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	MM139
Question 2	
What best describes the nature of your representation?	Support
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.

We are pleased to see the change in wording regarding green infrastructure, involving the removal of a typology of GI which did not accord with the GI Strategy, the Planning Obligations SPD or national policy and guidance.

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.

We support this modification.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod218
Response Date	24/11/21 10:10
Status	Processed
Submission Type	Web
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	MM157, MM158, MM159, PM1
Question 2	
What best describes the nature of your representation?	Support
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.

We are pleased to see wording changes to the transport policy which provide clearer information on the roads which are proposed within the Plan. However, since the principle of the policy itself has not been changed, these modifications do nothing to address the failure of transport policy in this plan to move away from “predict-and-provide” and work to actively reduce mileage by motor vehicles. Contrary to the assertion in MM159, an orbital route which would pass (at this stage) through open countryside cannot improve connectivity for “all forms of transport” since pedestrians and cyclists need their routes to provide very direct links to popular destinations, and to be safe; and public transport corridors, likewise, need to link residential areas directly to town centres and other destinations.

Question 5

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We support these modifications, but the strategy within the Plan, which continues to propose the construction of new roads as a means of dealing with traffic, is not compatible with planning for the climate crisis. Planning should be directed towards reducing the need to travel and encouraging modal shift towards active and public transport. As we have previously said, DBC's attitude towards modal shift - namely, that it is not going to happen - is in conflict with local, regional and national policy.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod221
Response Date	24/11/21 10:15
Status	Processed
Submission Type	Web
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	MM160, MM161, MM164
Question 2	
What best describes the nature of your representation?	Support
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.

We are pleased to see the recognition, in these two policies, of the need to provide for pedestrians, cyclists and public transport. We are pleased to see specific requirement for bus service proximity and frequency. However, we do not concede that a bus every 30 minutes constitutes a “regular” public transport service.

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 policy should be amended to require a more frequent bus service. What exactly constitutes a reasonably frequent bus service is, of course, a matter for debate, but a bus service of once every 30 minutes is much too infrequent; services of this type are used only by people who have no or little alternatives, and are therefore not a feasible means of bringing about modal shift.

Comment

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Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMoD222
Response Date	24/11/21 10:16
Status	Processed
Submission Type	Web
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	MM167
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.

We acknowledge that the Tees Valley Highway Design Guide includes some mention of facilities for cycle parking, showering and changing. However, since this document was published, the Government have produced national guidance on cycle infrastructure, LTN 1/20; we therefore propose that LTN 1/20 should be referenced instead.

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 Plan should invoke the most recent, and the highest-level, guidance on cycle infrastructure and facilities for cyclists, namely LTN 1/20. It should state that where there is a conflict between the standards in local and national guidance, the most stringent standards should be preferred.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod223
Response Date	24/11/21 10:17
Status	Processed
Submission Type	Web
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	MM169, MM170
Question 2	
What best describes the nature of your representation?	Support
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.

We are pleased to see the modifications to these policies, which will make it possible for wind energy projects to be permitted in the Borough.

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.

We support this modification.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod224
Response Date	24/11/21 10:19
Status	Processed
Submission Type	Web
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	MM181 – MM185; MM190-MM192
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.

These modifications, which provide additional guidance and requirements for the development of land on various housing sites, are generally sensible additions to the policy requirements already established. We are pleased to see measures against development in flood zones, additional requirements for landscaped areas and green wedges, and pedestrian and cycle infrastructure on Coniscliffe Park South across the Baydale Beck. We have a concern with regard to MM190, which modifies the requirements relating to Elm Tree Farm such that there is no longer a requirement to retain older farm buildings on site. This seems not to be compatible with policy aspirations elsewhere to protect non-designated heritage assets.

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.

MM190 should not be upheld. The policy should continue to require the retention of older farm buildings on the Elm Tree Farm site.

Comment

Consultee	Mrs Jo Ellis (1250913)
Email Address	[REDACTED]
Company / Organisation	Darlington Green Party
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Darlington Green Party (Mrs Jo Ellis - 1250913)
Comment ID	DBLPMod226
Response Date	24/11/21 10:21
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Which document/modification does this representation relate to?	Policies Map Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	Policies Map in general
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.

As a general point, the Policies Map is not easy to use. Most of its component sheets do not contain a key. It is only available in pdf format, rather than in an interactive web map format, and so users cannot zoom in to specific sites or turn layers on and off.

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 Policies Map should be available in an interactive web map format as well as in a PDF format. When supplied as a PDF, all of its component sheets should contain a legend.