

## **Whinfield Residents Association**

### **Response to DBC Draft Darlington Local Plan Consultation**

#### **Policy H1 – Housing Requirement**

- (a) We dispute the DBC figures of 492 dwellings needed per year, leading to 10,000 dwellings across the Town.
- (b) DBC state that the ONS figure of 177 is flawed, but DBC's figures are based on assumptions, estimates and guesswork, they are so wildly different from the ONS figures that they are even more likely to be susceptible to inaccuracy.
- (c) If the margin of error in DBC's figures is only a conservative over-estimate of 20%, this represents a figure of 2000 fewer dwellings required.

#### **Policy H2 – Housing Allocations**

- (a) Skerningham Strategic Allocation is expected to yield 1800 homes during the lifetime of the plan, but if at least 2000 fewer are needed across the Town because of inaccurate figures this would mean that the Skerningham Strategic Allocation is not required at all during the life of the Plan.
- (b) WRA, therefore, urges that the Skerningham Strategic Allocation be removed completely from the Draft Local Plan and that the need for its future inclusion can be reviewed at the time of the production of the next Local Plan in 2036.

#### **Policy H10 – Skerningham Strategic Allocation**

WRA objects to the inclusion of Skerningham Strategic Allocation in the Draft Plan, for the following reasons:

- (a) It is not needed if the DBC housing need figures are incorrect by only 20% [see Policy H2].
- (b) It represents development in the countryside and considerable expansion of the development limits.
- (c) It will adversely change the character and appearance of the land for evermore.
- (d) The development would change Whinfield from being a ward on the edge of the countryside to being an area well inside the suburbs of the Town, surrounded by housing development.
- (e) It means the loss of permissive paths and community woodland, highly valued, extensively used and easily reached by residents for recreation on foot, on horseback and by bicycle. When such routes run alongside or on housing estate roads they are much inferior to those in the countryside.
- (f) The plan will adversely affect other well-used public rights of way, many of which are very old and pass through what is currently attractive countryside; the ancient and historic Green Lane will no longer be a safe and pleasant route for its many users.
- (g) Wildlife habitats will be severely disrupted with consequent loss of many species, especially in Skerningham Countryside Park.
- (h) It will bring noise, air and light pollution to what is currently peaceful and clean, green countryside.
- (i) WRA objects to the proposal to re-locate Darlington Golf Course to Skerningham Countryside Park since it allows the loss of the only publicly accessible community woodland to the north of Darlington for the benefit of private gain by the landowners and developers. Even if other developments were to be allowed in this area, promoting the golf course move makes no sense whatsoever in terms of cost, layout, environment, amenity and usefulness of the site. The existing golf course is well established and the community woodlands are well used in their current positions, without any need to move either. This part of the Plan should be dropped.
- (j) To offset any loss of community woodland, the Draft Plan proposes a "net" increase across the site. This suggests that any "new" community woodland might be separated by some distance from Skerningham Countryside Park itself and since there does not appear to be any possible replacement woodland in existence in the area, it will have to be planted. Since newly planted woodland will take 20-30 years to grow and become established, WRA believes that the replacement woodland, and thus a net increase, cannot be achieved during the lifetime of the Plan.

- (k) The proposal to allow the loss of some of Skerningham Countryside Park would appear to conflict with Policy ENV4 of the Draft Plan, in particular Point F - Green Infrastructure, about *“Refusing planning permission for development that would result in the loss of existing green space.....”*
- (l) Skerningham Strategic Allocation is unsustainable. The road infrastructure in and around Whinfield is already overloaded at peak times and will not be able to cope with the huge influx of traffic resulting from the Skerningham Strategic Allocation. Even if a Northern Bypass is ever built, there will still be a large increase of traffic in and around Whinfield resulting from development at Skerningham. There are few improvements that can be implemented at ‘pinch points’, such as on the A1150 that would relieve congestion from the sheer volume of extra traffic. The Skerningham Strategic Allocation will only add to the problem, which will be exacerbated when the size of the development rises to 4000+ homes.
- (m) Re. para 6.10.3, WRA deplors the fact that there has been considerable co-operation between DBC and landowners and developers to produce a "masterplan" for Skerningham, yet there has been no meaningful involvement or consultation whatsoever with those people likely to be most affected by the proposals, namely the nearby residents and users of the land. The so-called “consultation” by the developer in Autumn 2017, with DBC's backing, was presented as a ‘fait accompli’ with the emphasis not on the desirability or otherwise of whether there should be some kind of development and whether the golf course should move, but rather on what sort of houses the public would like to see there when it is built as already planned. This Draft Local Plan consultation is also no substitute for a process which should have taken place with the public prior to any major decisions being made about the considerable expansion of the Town, which might have led to a measure of agreement from the residents about development had it been handled properly, rather than the conflict and opposition which pertains now.
- (n) Re. para 6.10.13, WRA opposes any interference with Springfield Park whatsoever. Springfield Park has been designated as an Asset of Community Value by Darlington Borough Council, following an application by Whinfield Residents Association, which reflects the value placed on the Park by the local community. Springfield Park provides play facilities and facilities for sport and recreation, serving the Whinfield and Whinfield Park housing estates. The play facilities in the Park are particularly well used. Any incursion by a busy road, even if it is on the eastern side of the Park, will be a threat to the integrity of the Park. Providing compensation in the form of extra land to the north of the Park is inadequate, and the natural northern boundary of the Park is Green Lane, so this will not work. Putting a busy new road along another side of Springfield Park is unacceptable on safety and aesthetic grounds, since it already has the very busy A1150 along its southern boundary. Even if development of some kind takes place at Skerningham, Springfield Park should be removed from the Plan as a development area, and protected.

#### Policy ENV3 – Local Landscape Character

Re. point A, *“Retaining the openness and green infrastructure functions of.....between Darlington and the villages of Great Burdon and Barmpton”*, this is contradicted by the proposals for the Skerningham Strategic Allocation, which involve development in these areas.

#### Policy ENV6 – Local Green Space

- (a) WRA objects to the non-inclusion of the following Local Green Spaces in the Draft Local Plan, for which the Association applied for designation in good faith during the DBC consultation on the issue:
  - (i) LGS02 – Springfield Park
  - (ii) LGS03 – Green Lane
  - (iii) LGS04/LGS013 – Skerningham Countryside Park
  - (iv) LGS07 – Muscar House Farm
  - (v) LGS08 – Sparrowhall Drive
- (b) WRA believes that all of these sites largely meet the criteria for Local Green Space designation, and we provided much evidence to that effect during the DBC consultation.
- (c) The fact that Skerningham Countryside Park was proposed by 2 different organisations is indicative of the importance that local communities place on this particular site.
- (d) There does not appear to be any mention of the sensitivity surrounding the fact that there are burial sites in Skerningham Countryside Park, nor any proposal to accommodate them into the masterplan.

- (e) The Local Green Spaces Report, which rejects these 5 sites, mostly uses the phrases: “*Site is within a potential strategic allocation area. Development of this area is to be informed by a masterplan.....Scoped out of assessment and not recommended for designation.*” WRA believes that using the proposed Skerningham masterplan as a pretext for refusing to include the sites is unfair and not in the public interest. It presupposes that the masterplan is all-powerful and supercedes any other compelling evidence for Local Green Space designation, such as the importance communities put on them. The LGS sites should inform the masterplan, and not vice versa.
- (f) If the sites meet the criteria for Local Green Designation on their merits then they should be so designated, irrespective of whether DBC would find that to be inconvenient for their so-called “masterplan”. If DBC had no intention in allowing the sites to be designated they should have said so at the start of their consultation and saved the public and organizations like WRA considerable time and effort, but perhaps this would have been far too transparent an approach as to their real intentions.
- (g) We welcome the designation of LGS01, but it should be noted that the site is known locally as “Beech Wood”, and not “Beech Road/Winbush Park” [sic – usual spelling is “Whinbush”].

Policy ENV7 – Biodiversity and Geodiversity and Development

- (a) It would seem to be obvious that if even only part of Skerningham Countryside Park were lost to development of a new golf course, Biodiversity and Geodiversity would be adversely affected.
- (b) It is difficult to comprehend how such a new golf course would enhance or protect the River Skerne Strategic Corridor, bearing in mind its proposed proximity to the River Skerne in Skerningham Countryside Park.
- (c) Re. Point Diii of the policy, this refers to “**Community Woodlands and Ancient woodland - New development will be expected to retain existing woodlands.....**” This policy conflicts with the Skerningham masterplan to allow relocation of Darlington Golf Course to Skerningham Countryside Park Community Woodland.
- (d) The policy refers to “**H. Wildlife friendly greenspaces, parks and parklands: Protect and improve their wildlife value.**” We contend that allowing development of any kind in the Skerningham woodlands would have precisely the opposite effect, and adversely affect wildlife habitats.
- (e) There appear to be no environmental benefits to the residents of Whinfield, and only detriment, of allowing the re-location of Darlington Golf Course to Skerningham Countryside Park.

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