

Darlington, Friends of the Earth,

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DARLINGTON
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Date: 19th September 2016

Tel: ██████████

Planning Policy,
Darlington Borough Council,
Town Hall,
Darlington,
DL1 5QT,

FAO of Steve Petch

planning.policy@darlington.gov.uk

Darlington Borough Council – Local Plan 2016-2036: Draft Sustainability Appraisal Scoping Report.

Dear Steve,

Please find attached comments from Darlington Friends of the Earth in relation to the above.

We agree the sustainability appraisal should focus on what is needed to address the likely significant effects of the Local Plan. It should rightly focus on the environmental, economic and social impacts that are likely to be significant.

We would expect the sustainability appraisal to include an environmental report evaluating the likely effects on the environment of implementing the Local Plan. There should be an environmental appraisal or assessment to support this as the Local Plan covers a large area with significant environmental effects. The sustainability appraisal needs to incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and we agree should take into account the findings of a Habitat Regulations Assessment if it is considered that the Local Plan will have significant effects on European habitats or species.

We are not sure if there are any sites within Darlington itself that will require a Habitats Assessment but developments in Darlington may impact on such sites elsewhere (particularly Teesmouth and Cumbria). I think that the council should make it clear that it will be looking into this.

The sustainability appraisal scope should include an understanding of the existing conditions (base line conditions) and identify key issues, problems and data gaps. There is a need to evaluate alternative options with implications for each for ready comparison and consider deliverability and affordability together with monitoring and measuring the significant effects of implementing the Local Plan.

The appraisal needs to consider the Report of the Natural Capital Committee and the benefits that this can bring to the economy and to well-being. This could include taking positive and relatively cheap steps when determining planning applications to include provision for wildlife. Whilst this maybe not desirable in all housing developments it could certainly fit into employment sites and may have the added benefit of improving productivity of the workforce.

In terms of data gaps for the Environmental Assessment and to support new policies the Council should consult with Environmental Records Information Centre North East (ERIC), Durham Bird Club, British Trust for Ornithology, Durham Wildlife Trust and Tees Wildlife Trust to ascertain sensitive sites.

We are disappointed that the Council appears to have already identified incompatibility between environmental objectives and achieving economic growth and providing new housing. It appears the Council is prioritising short term growth ahead of longer term more sustainable proposals to mitigate flood risk, and safeguard and enhance biodiversity. The sustainability appraisal should be measuring the impacts on biodiversity loss and the relationship between indicators of environmental degradation and income per capita. We believe efforts to preserve and enhance biodiversity can add to the size of growth of the economy and peoples well-being.

In terms of Transport the sustainability appraisal also appears to fall short. It considers economic competitiveness and growth and health is limited to reducing the risk of death or injury but does not consider illness arising from transport. More people have their lives shortened by air pollution than through accidents. Whilst road safety is understandably given a high priority, we would like to see measures to improve air quality and reduce exposure to air pollution given equal evaluation in your appraisal.

The Draft Sustainability appraisal therefore needs to consider

- Options that reduce emissions of greenhouse gases and improve air quality.
- Options to reduce contaminants in ground water.
- Biodiversity and green infrastructure to take into account the objectives of Durham and Tees Biodiversity Action Plan species. This to include options to address declines in farmland, woodland and urban species and prevent further loss, damage and deterioration to key wildlife habitats and nature reserves.
- Promote enhanced biodiversity and quality of life in urban areas including biodiversity in policies for sustainable communities.
- Climate change mitigation and energy. Will the Local Plan reduce or increase energy consumption or help reduce energy consumption for others?
- Housing needs to be supported by a Strategic Housing Land Availability assessment and a Housing Market Assessment. The appraisal needs to clearly show these assessment results and the effects of any new development in rural areas.

My response hopefully answers your questions in relation to additional key issues to be considered and any omissions. Finally, thank you for the opportunity to comment.

Yours sincerely,

Kendra Ulliyart
Chair
Darlington Friends of the Earth