

Comment

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Question 1a

Do you consider that the Local Plan is Legally compliant? No

Question 1b

Do you consider that the Local Plan sound? No

Question 2

Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)

- Effective
- Justified

Question 3a

Your Comments

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 4

Changes Sought

Please Note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.

Please set out what change(s) to the Local Plan you consider necessary to make it legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

See attached representation.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?

Yes, I request to be notified

Question 7

Please **upload any supporting documents** here. Please do not include any signatures or other personal data such as home addresses which you would not wish to see published on the Council's website.

[DBLPPS712 Jo Land.pdf](#)

Darlington's draft Local Plan: what are the likely health impacts?

Jo Land

Version 2, September 2020

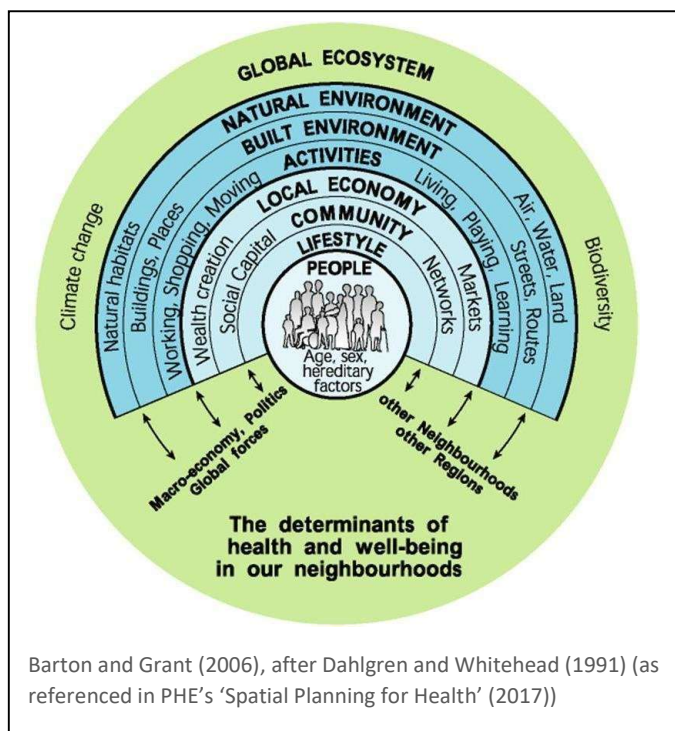
Key take-aways:

- With regards to health, the Darlington Local Plan **is not fit for purpose**.
- The proposals contained therein are not consistent with existing policy guidelines on planning for health as outlined in the Healthy New Towns framework, the NPPF, or [PHE's Spatial Planning for Health](#), despite repeated references to the first two policy frameworks. **It must therefore be concluded that the plan is not sound in this regard.**
- Failure to fully consider these national policies and the best available evidence on planning for health, such as that referenced in PHE's Spatial Planning for Health and other key documents such as [Fair Society, Healthy Lives](#) (The Marmot review) means that the Local Plan has not fully considered the available evidence base, **and therefore the Local Plan is not justified.**
- This means that while the Plan may make reference to improving the health of the population, health, **the policies contained therein will not be effective.**

Introduction: Town planning - why is it important to health?

Health is not just the absence of illness. According to the World Health Organisation (WHO), health 'is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'. Health is not just an issue for the individual, but is profoundly affected by the society and communities we live in – the 'social determinants of health'. These determinants affect us throughout our lifecourse and adverse social conditions can have cumulative affects throughout our lives. For example, infancy and childhood are crucially important 'sensitive windows' during the lifecourse, in which influences on development can profoundly affect health for the duration of an individual's life. The social determinants of health mean that town planning can profoundly affect the health of the population of that town, and therefore it is of great importance that it is carried out with the likely health impact in mind.

The figure below illustrates a social determinants model and shows that a wide variety of social factors affect the individual and affect health outcomes. Factors such as housing and living and working conditions affect the health of communities and individuals.



The rest of this summary will consider the possible impacts of the Local Plan on the health of the population of Darlington, using a social determinants approach, which is endorsed by the WHO and leading experts in population health, and is also embedded in national and local policy. [Darlington's Healthy New Towns](#) framework, which is based on national policy guidance, incorporates a 'social determinants' approach, as does Public Health England's (PHE) ['Spatial Planning for Health'](#). The [National Policy Planning Framework \(NPPF\)](#) specifically acknowledges the role of planning

in 'promoting healthy and safe communities'. This report will conclude by considering whether the proposals contained in the Local Plan are consistent with existing policy, well-evidenced, and likely to be effective.

Darlington's Local Plan: is it likely to have an impact on health outcomes?

The Local Plan does acknowledge the role of planning in health, for example, stating that new developments will follow the Healthy New Town model. However, it fails to recognise the impacts that new developments will have on residents in surrounding areas of town, or the health consequences of living in new developments that are likely to promote dependence on cars as the primary means of travel.

The health of all residents of Darlington could potentially be impacted by the short-termism of the Local Plan. As has been stated [elsewhere](#), the Local Plan is as notable for what it does not propose as what it does propose; there is a lack of attention paid to the impact of the potential for changes of use in the town centre, and it has neglected residential areas on the town centre fringe. The Plan falls short in failing to apply the existing Healthy New Towns model to the whole town, which states that town planning should 'Promot[e] better health and illness prevention through the way that housing and the public realm are developed – using housing and the public space as a contributor to health improvement'. While the Healthy New Town Model has initially focused on the Eastern Growth Zone (Red Hall, Burdon Hill and Lingfield Point), DBC's literature on the Healthy New Town Model

states that [‘whatever lessons we learn in our work, these should be replicated across the borough of Darlington and beyond’](#). Failure to apply these principles throughout Darlington’s Local Plan is likely to impact on the health of residents.

The sections below give a more detailed breakdown of the likely impacts of the Local Plan on the people of Darlington.

Healthy lifestyles

Transport

The plan has not fully considered the issue of the need for sustainable transport, which will also be considered in ‘Sustainable Futures’, below. The Local Plan increases urban sprawl, and with 7 new major road developments proposed, ‘bakes-in’ car dependence for future generations. This means that journeys are less likely to be made by foot or by bike, forms of exercise that can help us stay healthy [by decreasing the likelihood of obesity and improving cardiovascular fitness, reducing the risk of type II diabetes and cardiovascular diseases such as heart attack and stroke](#).

Insufficient provision has been made in particular for journeys by cycle. Many people would like to cycle but are deterred from doing so by the shortcomings of cycling infrastructure in Darlington. The Local Plan would not improve this. There are no concrete proposals for strategic improvements to cycling infrastructure, in contrast with the 7 specific proposals for new roads, and no commitment to or proposals for safe, segregated cycle lanes. Darlington’s Healthy New Towns plan states that planning **must** prioritise walking and cycling over all other forms of transport. The Local Plan very clearly does not do this. In order to increase the number of journeys made by bike, it is not sufficient to provide more leisure routes: [the infrastructure must exist between places between which people want to travel](#), or car journeys are unlikely to decrease.

The Government has recently announced new measures to help us all get cycling, but without improving infrastructure, this is unlikely to happen. Therefore, an opportunity will be missed, with all the attendant impacts on the health of the population of Darlington.

Access to green open space

The Local Plan will be a disaster in terms of the loss of green open space. Loss of public rights of way, fields and woodland reduce opportunities for recreation and exercise, which [is essential to good health](#). It is particularly important that children have easy access to such amenities, as exercise is crucial to healthy development [– lack of exercise, such as that which can be easily facilitated by open green space, can have life-long health impacts](#). Easy access to universally accessible green amenities benefits the health of communities. Destroying areas of long-established woodland and replacing it with a golf course, which is of benefit to only a small minority of the population, is just one example of the kind of loss

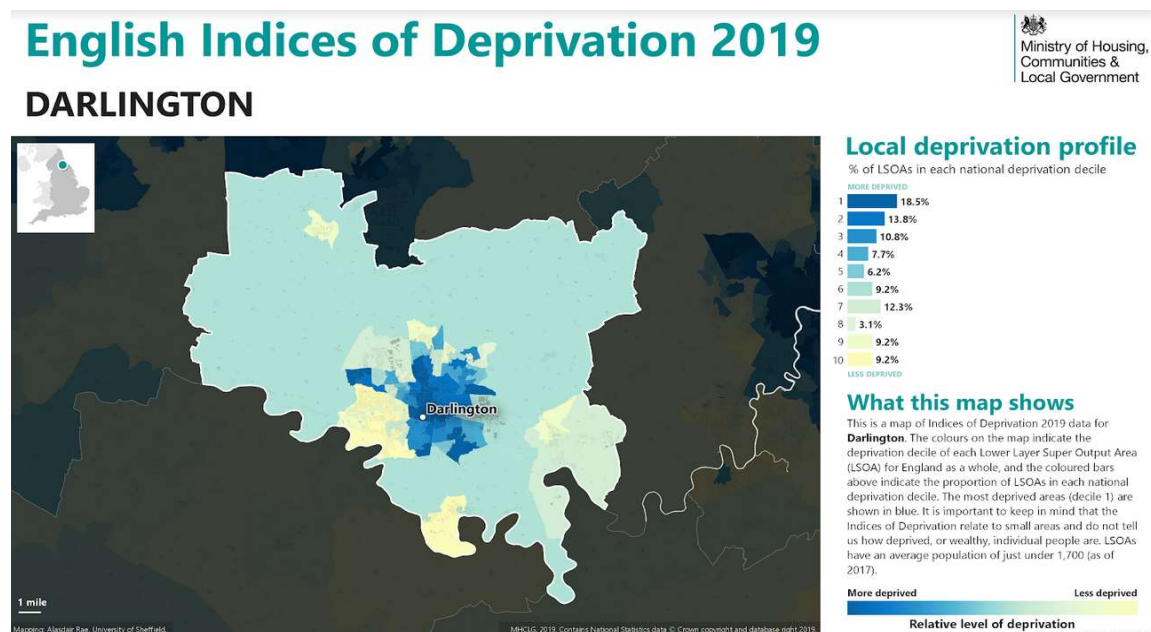
to the community that would be inflicted by this plan. The woodlands proposed as a replacement would take decades to establish themselves.

Food

The Plan needs to consider whether people are within easy walking distance of outlets that sell healthy, affordable food. Increased urban sprawl brings with it the attendant risk of creating 'food deserts' reliant on car travel and supermarkets. More thought also needs to be given to the allocation of land for allotments and community growing schemes, which barely feature in the Local Plan, but can have a positive impact on health by increasing opportunities for exercise, community organisation and sustainable food production.

Inequalities and economic development

The Local Plan risks failing Darlington by not addressing the needs of the people of Darlington who are less economically advantaged. Darlington contains some of the most deprived areas of the UK, as measured by multiple indices of deprivation. [As this map shows](#), approximately a third of the population of Darlington live in the 20% most deprived areas in the country (32.3% of LSOAs), and these more deprived areas tend to be towards the town centre.



[The Plan fails to fully consider the need for redevelopment of the town centre and town centre fringe](#). There is no thought given to the trend towards closure of retail outlets, which may necessitate a move towards mixed use regeneration. The Commercial Street/ Kendrew Street car park site is put forward for redevelopment for retail, which in the current economic climate seems highly unlikely.

The Plan acknowledges that the Town Centre Fringe areas is 'underused' and underdeveloped yet puts forward very few concrete proposals for addressing this. A plan that fails to consider the needs of these areas is a plan that risks creating a declining town centre and a '[doughnut of deprivation](#)' effect on the Town Centre fringe, with a negative impact on health. [Living in a neglected community in economic decline, possibly in substandard housing, has a negative impact on health, as a wide range of research shows.](#) An unequal town is an unhealthy town – for everybody; inequality is recognized [by world-leading experts as a cause *in itself* of ill health.](#)

In addition, if the Town Centre becomes a less attractive place to visit, car-dependent residents living in the new developments to the north and north-east of Darlington are likely to drive to other urban centres, precipitating further social and economic decline in the Town Centre.

The Local Plan has been put forward on the basis that it will stimulate economic development. As has been pointed out [elsewhere](#), the evidence base for this is weak. [Employment is a major determinant of health](#), so it is important that the Local Plan supports sustainable economic development and employment. However, it is very unclear that the plan does this. In particular, in neglecting the town centre at the expense of prioritizing building urban sprawl on greenfield sites, it may well be to its detriment.

Communities and mental health

Much of the potential impact that the Local Plan will have on communities and mental health flows from the discussion in previous sections. In brief, communities in need of regeneration are neglected in favour of building unnecessary housing on the very edge of town. Communities surrounding these superfluous developments are likely to have their access to amenities and open green space negatively impacted.

As has been extensively documented elsewhere, the population of the UK is aging. Little thought has been given to the needs of this demographic, who could benefit from being close to a wide range of amenities and community facilities in the Town Centre. The kind of low-density housing proposed in this plan is unlikely to suit the needs of this demographic, who tend to downsize.

Neglected communities, a failure to meet pressing regeneration needs in the Town Centre, failure to provide the right mix of housing and removal of open green space are all likely to contribute to the increasing prevalence of mental ill-health. [Thriving, connected communities are necessary to promote wellbeing.](#)

Air pollution

The continued (and increased) reliance on cars inherent in the Plan brings with it the likelihood of increased air pollution from car exhausts. Currently, 83% of air quality reporting zones in the UK have illegal levels of [air pollution](#), including the North East of England. This is not an area of policy that we can be complacent about, by creating developments that allow it to deteriorate further. Air pollution leads to [an increased risk of death](#) and respiratory disease, amongst many other deleterious health effects, and for this reason, increased air pollution is not justifiable.

Sustainable futures

As previously discussed, reliance on cars is facilitated by this plan, which proposes building at least 7 new roads as part of the strategic network. This is not a sustainable proposal, and at the very least would need an extensive overhaul of the public transport network to reduce carbon emissions. [The low-density developments proposed on Darlington's fringes would have an unjustifiable carbon footprint and cannot be considered to be sustainable.](#) These developments are irresponsible at a time when we must limit carbon emissions as much as is possible in order to mitigate climate change, which presents a threat to health, and indeed to all life on earth.

Loss of natural habitats and biodiversity is also a recognized threat to the health of populations. For example, the food chain depends on a wide variety of pollinators, such as bees. The destruction of natural habitats and biodiversity inherent in this plan is inimical to food security and good health.

We all depend on local and global ecosystems for our health and even for our continued survival as a species. This is why all local authorities must act with these ecosystems in mind, or by 2036, the end date of the Local Plan, we will all be suffering the health consequences of extreme weather events and food insecurity.

Conclusion

With regards to health, the Darlington Local Plan **is not fit for purpose**. For the reasons explained above, the proposals contained therein are not consistent with existing policy guidelines on planning for health as outlined in the Healthy New Towns framework, the NPPF, or PHE's Spatial Planning for Health, despite repeated references to the first two policy frameworks. **It must therefore be concluded that the plan is not sound in this regard.**

This document was classified as: OFFICIAL

Failure to fully consider these national policies and the best available evidence on planning for health, such as that referenced in Spatial Planning for Health and other key documents such as Fair Society, Healthy Lives (The Marmot review) means that the Local Plan has not fully considered the available evidence base, **and therefore the Local Plan is not justified.** This means that while the Plan may make reference to improving the health of the population, **the policies contained therein will not be effective.**