

Comment

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Do you agree with this content?	Object

Please tell us why

The sustainability appraisal (SA) shares the same fault as the local plan, in that it assesses the plan against the general aspiration (para 1.9) "to reduce greenhouse gas emissions" rather than the objective requirement for the local plan to achieve radical carbon reductions in line with the 2008 Climate Change Act, which now commits the UK to achieving net zero emissions by 2050. This has consequences for how the SA then assesses the sustainability of the policies which follow.

In fact, we note that Table 3.2, the list of relevant Plans, Policies and Programmes, does not mention the Climate Change Act 2008(c 27). Nor does Appendix A, which summarises relevant international, national and regional legislation and guidance. This seems to be a significant omission.

These sections also refer to documents and measures therein which are now less relevant. Firstly, they list “Laying the Foundations: A Housing Strategy for England“(HM Government, 2011), mentioning the New Homes Bonus, which has now ended. Secondly, they list “The Carbon Plan: Delivering our Low Carbon Future” (DECC, 2011), which has been superseded by the Climate Change Act, so this policy has out of date carbon reduction targets.

The approach to assessing the proposed settlement hierarchy seems flawed and partial. For example, three options for distributing development – permitting development outside the town in large villages only, large and medium-sized villages, or all villages – are assessed against the potential for reducing greenhouse gas emissions, and all three are deemed to have a neutral effect. This doesn’t make sense, as allowing development to go ahead in settlements with few or no services will inevitably increase transport emissions compared with concentrating development in locations that are accessible to services by active travel.

The discussion contains only passing discussion of the impact on emissions. It discusses unsustainable development without really defining what this means.

The same approach is adopted throughout the SA. It doesn’t really draw out the real implications of any of the policy choices in terms of their impact on emissions within the district, or resilience to climate impacts.

Changes required

The SA should update its list and Appendix of relevant legislation, removing references to obsolete documents or obsolete measures within documents that are otherwise still in use. It should list the Climate Change Act 2008 (as amended). All policies, and reasonable alternatives to them, should be assessed for compliance with legislative and policy requirements in specific rather than general terms: they should be carbon-audited, their impact upon resource consumption and resilience to the impacts of climate change should be robustly assessed.