Response to Darlington Borough Council's Draft Local Plan for Darlington Green Party

General comments

Many of the policies contained within this document are unremarkable and, as such, fairly innocuous – although, as we discuss later, in several respects they fail to consider the impact of development upon society and the environment, and local authorities' responsibility to ensure that this is mitigated, particularly in a time of climate crisis.

Overarching aims

We do not object in principle to three of the Overarching Aims set out in Chapter 2:

- Deliver sustainable development to meet the Borough's needs through a cohesive plan which makes the best use of land and resources.
- Protect and enhance the quality of Darlington's built, natural and historic environment, and to use it positively to create great places.
- Contribute to the satisfaction, fulfilment, health and wellbeing of the population of the Borough.

However, we have significant concerns about the remaining Overarching Aim:

- Deliver new development that is capable of facilitating local or strategic infrastructure.

This implies that the *purpose* of new development is to facilitate infrastructure. We do not, of course, object to the idea that new development should be supplied with the facilities and services that are needed for its residents, visitors and employees. Nor do we dispute the point that local authorities have a responsibility to identify requirements for strategic infrastructure – provided that that process considers the potential impact upon the local and global environment. However, we have concerns that a desire to generate development *in order to* fund infrastructure may, here as elsewhere, lead to an enthusiasm to permit development irrespective of its merits, and irrespective of its impact upon the local and global environment.

Calculation of housing need

We have significant concerns over DBC's assessment of housing need. The number of dwellings they claim will be required over the Plan period (9840, or 492 dwellings p/a) is nearly three times as much as is required under the standard methodology provided by the Government (3,310 dwellings, or 166 dwellings per annum). We do not agree that exceptional circumstances exist to justify the use of a different methodology, and we do not agree with the collection of arguments put forward for increasing the projected housing requirement, which include anecdotal findings, double-counting, unfounded hypotheses and flawed logic.

Land allocation

The calculation of housing need is deeply flawed; the strategy, or lack of it, chosen to accommodate the proposed dwellings is no better. Large swathes of undeveloped countryside are allocated for low-density development, with only a cursory assessment of their suitability and of man-made and natural heritage upon them, and of the environmental impacts of development. The very low density proposed for most of these sites, in contradiction to policies expressed

elsewhere in the Plan, not only increases the amount of land-take but looks set to mandate a pattern of living entirely reliant on the private car.

In allocating land for low-density housing, there seems to be little recognition of the fact that the small increase in household numbers which *is* predicted over the Plan period is almost entirely due to a shift towards smaller households: by 2039, 61.19% of households in Darlington will consist either of one person or a couple[i]. Many of these will be older people whose needs are met most effectively by smaller, accessible dwellings within easy reach of facilities and services – the very antithesis to what is proposed within Darlington's new housing estates.

The saving grace might be that, given the uncertainties of the market, the vast new estates proposed might never be built. But in that case, this Plan is nothing more than a denial of planning's responsibilities to create functional towns and cities and to protect the environment. If almost anything is allocated for development, the effect is the same as having no planning system whatsoever: uncontrolled sprawl, inefficient in terms of land-use, dysfunctional in terms of place, and destructive in terms of the local and global environment.

Road proposals

We also have concerns over the several new roads proposed for Darlington. There appears to be little justification for their construction. There is no discussion of the problems they are intended to address, and certainly no consideration of alternative means of addressing them. This is at a time when the cultural dominance of driving appears to be slipping: fewer young people are learning to drive, and more people are concerned about its environmental impacts[ii]. Given the absence of detailed information on these proposals, they are difficult to critique, but, since any road proposal will almost certainly destroy habitats, cost a great deal of money, add to local air pollution and increase greenhouse gas emissions, we are disturbed to see that they seem to have been approved in principle without reasonable scrutiny.

Lack of policies to support sustainability

Finally, although many of the policies in the Plan are unremarkable, several of them display a profound lack of interest in, or knowledge of, sustainable development, particularly where it concerns the relationship between development and carbon emissions. The National Planning Policy Framework states that the purpose of the planning system *is* to contribute to sustainable development, which is defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs (NPPF, p.5). It is therefore very unfortunate that DBC do not prioritise finding out what sustainable development in Darlington would constitute, and putting in place policies to achieve it.

In sum, this Plan would always have been unjustifiable: the pattern of development that it proposes is damaging to local landscape quality, habitats, air quality and the historic environment, and fails to provide appropriate housing, facilities and services for the people of Darlington. Since the 2018 IPCC report on climate change[iii] and the 2019 IBPES Global Assessment on Biodiversity[iv], which have alerted us to the magnitude of the threat we face from uncontrolled and unsustainable lifestyles and patterns of development, it is simply irresponsible. It calls into question the very worth of the planning system.

Contents

1) Housing projections

The objectively assessed need (OAN) for housing in Darlington over the Plan period (2016-2036) is 177 households per annum, including a 5% buffer. This figure is derived from Office for National Statistics figures and follows the standard methodology prescribed by the Government in 2017. This methodology was prescribed because of concerns over *under*-allocation of housing in Local Plans, particularly in areas of severe housing need.

As DBC's recent 5 Year Housing Land Supply Position Statement (5YPS) states, this means that in the first 5-year period after the Statement – April 2018 to March 2023 – the total number of dwellings required is 885.

In the year 2018-19, however, 476 dwellings have been completed – leaving only 429 (409, plus a buffer of 5%) to be completed by March 2023, or 86 dwellings per annum.

In the Plan, however, DBC have rejected the OAN as calculated by the Government's standard methodology. Instead, they propose a target of 492 dwellings per annum, or 9840 over the Plan period.

This figure is taken from a document produced in October 2017 by Opinion Research Services (ORS): Darlington Strategic Housing Market Assessment Update 2017(henceforth the ORS Update 2017)

As an aside, there should be no *need* for a local authority to commission consultants to calculate the OAN, since the standard methodology is simple, used nationally, and is based on freely-available statistics. The very fact that DBC have done so demands some explanation.

In fact the sequence of events makes the ORS Update 2017 look less like an impartial piece of research than an attempt to justify previous findings. In November 2015, ORS produced a Strategic Housing Market Assessment (SHMA), which proposed a need for 443 dwellings per annum, or 11,080 dwellings over the 25-year period 2011-36 (although 443 x 25 actually equals 11,075). In September 2017, the Government published its standard methodology for calculating OAN, which *should* have rendered this calculation unnecessary. A month later, ORS produced the ORS Update 2017, which repeats many of the assertions within the SHMA and, like it, proposes an annual housing requirement far in excess of the OAN.

ORS employ a number of arguments to support their case that the Government's OAN is inadequate. We reject all of these arguments, which we list below.

a) Straightforward disbelief.

ORS simply argue that the ONS's Mid-Year Estimates on which the housing projections are based, *must* be incorrect. They argue that, since the population grew at a rate of approximately 770 people p/a in between 2001 and 2011, it can't possibly be the case that it increased by only 60 people in between 2011 and 2016.

In fact the likely answers to this conundrum lie within the ORS Update 2017 itself. As they state, between 1991 and 2001 the population declined by 1,100 while in between 2001 and 2011 it increased by 7,700. However, as they admit, "the indications are that the 2001 Census under-

estimated the number of households and population of Darlington. This would imply that using data trended between the official 2001 and 2011 Census figures would over-estimated (sic) the projected growth in population." (p.12)

Furthermore, the ONS projections for Darlington are far from aberrant in the region or nationally. The ONS predict that Darlington's population will increase by 1.84% in between 2014 and 2039. This puts it in between nearby Redcar and Cleveland, set to decline by 0.87% and Hartlepool, set to increase by 3.5. Those local authorities in the region where increases are expected – Stockton (9.83%) , Middlesbrough (7.66%) and County Durham (8.86%) – are all areas where the student population is expected to rise considerably over this period (most significantly in Middlesbrough where households of type "other" - that is, not families, couples or single people – are expected to rise by 39%). ORS themselves use Pendle as a comparator; the projected increase in Pendle is 1.67%.

b) Studious disregard for the obvious explanation.

As ORS explain (p.14) the number of people moving into the town has been highly variable over recent decades. In the relatively prosperous first decade of the millennium in-migration levels were quite high, averaging 600 persons p/a (with the caveat, as discussed in the previous paragraph, that this may not be accurate). Numbers of migrants may have increased as a consequence of the EU expansion in 2004 and 2007, when citizens of Eastern European countries gained free movement. The number of in-migrants declined in 2007/8, the year of the credit crunch, and were strongly outnumbered by people *leaving* the town in the period 2011 – 2015. This is consistent with national findings showing significant declines in business activity in many less-prosperous local authorities, including all north-eastern local authorities.[v] In this context, we would expect the balance of in- and out-migration to shift towards the latter.

Rather than admitting that economic forces may have affected migration – as they normally do – ORS conclude that "the migration data from 2011-12 in particular appears to be highly implausible, given the figures from previous years." (p.14)

c) Selective use of data to indicate a misleading trend.

Having rejected the ONS's migration predictions, ORS establish three alternative migration scenarios. One is based on average migration rates over the two decades from 1991 to 2011. The second is based only on the period of high in-migration within that, from 2001 to 2011. The third is "based on changes to average household size". The methodology for this third scenario isn't given, so it isn't possible to critique its validity. However, on the basis that the second (high in-migration) and third "household size" scenario arrive at similar figures, ORS conclude that the second is likely to be accurate.

All good researchers know that to select only *part* of a dataset and to use that as a basis for a trajectory is an invalid course of action. This is sometimes done inadvertently where only part of a dataset is available when the trajectory is calculated. In this case, the researchers select a part of a larger dataset that gives the impression of high, and sustained, levels of in-migration, while fully aware, firstly, that other parts of the dataset give the contrary result, and, secondly, that the whole dataset is highly variable so that consistency is the exception rather than the rule.

d) Treating an aspiration as a prediction.

ORS state that the Local Plan sets a target of 7,034 new jobs. “Given that this is an aspirational figure,” they state, “it does not directly impact upon the OAN for Darlington.” Some of the hoped-for extra jobs will already have been taken into account in the ONS-based figures as part of normal changes in the town, and therefore there should be no *need* to count them again. However, they do it anyway – stating that another 1400 dwellings, or 70 dwellings per annum, will be needed in connection with these hoped-for jobs.

It’s possible to argue that this might be justified - although it would be a departure from the Government’s methodology – if there were a robust indication that the aspirations behind the jobs target were supported by current proposals for economic development. However, the Local Plan’s strategy for economic growth is, essentially, to allocate some more industrial land. Given that nearly 30% of Darlington’s existing industrial land is vacant at present (173.48 ha of 607.25 ha) we do not agree with the suggestion that to allocate more land for industry will necessarily lead to a surge in employment. (Furthermore, we do not believe that the urbanisation of another 76.52 ha of greenfield land is justified in this context.)

e) Disregard for the inter-relationship between trends.

ORS state that the hoped-for 7034 new jobs would employ 6763 people – assuming that some might be part-time. They assume – given their *already* inflated population predictions – that over the Plan period there will be an additional 3482 people of working age.

However, given that *at present* 31.1% of workers resident in Darlington commute out of the town, they decrease this figure by 31.1% to 2399.

ORS acknowledge the potential for out-commuting to be matched by in-commuting. However, since they note that *at present* 35.3% of jobs in Darlington are filled by in-commuters, they assume that that proportion will remain constant – i.e. that *no more than* 35.3% of the 6763 “new” jobs will be filled by in-commuters – 2385 jobs.

Therefore, the total number of available “new” employees is 4785, leaving a shortfall of 1979 workers . There is a small decrease of 171 for formerly unemployed people, although ORS claim “Whilst it is possible that further jobs growth will also further reduce unemployment, we have not made any allowance for this and have assumed that unemployment does not fall from the level recorded in 2017.” Therefore, ORS claim that to accommodate the required 1808 workers, an additional 1400 dwellings will be needed.

Of course, all this is absolutely disingenuous. Should Darlington really see a very large increase in the number of jobs, we would expect to see reduced levels of out-commuting, increased levels of in-commuting, and reduced levels of unemployment. [1]

f) Conflation of datasets.

[1] Indeed, these are all reasons why a local authority might wish to see an increase in jobs in the area. If DBC truly believe that – exceptionally – creating new jobs in the town will have no such impact, it rather begs the question of why job creation would be desirable.

ORS state that by the end of the Plan period, 772 extra people will be in residential institutions. They therefore argue that "household needs based on the household projections would be 657 dwellings higher if the additional bedspaces were not met." Therefore, they suggest that 30 more dwellings per annum should be added to the total housing requirement and add "bedspaces in care homes would then be able to be counted towards the housing requirement. "

We do not accept that it is reasonable to conflate a requirement for institutional care (class C2) with a requirement for dwellings (class C3).

Firstly, because it constitutes double-counting. It is by no means true that when an older person moves into an institution, his or her household ceases to exist; many will have spouses, or other family members, who continue to live in the family home.

Secondly, because it draws an unreasonable equivalence between two different things. The implication seems to be that if the additional bedspaces are not provided, older people in need of residential care *may as well* be accommodated in their own homes. This not only inflates the housing requirement unjustifiably, but shows a cavalier disregard for the needs of vulnerable older people.

g) Use of (apparently) unfounded estimates.

Two more additions are made to the total: an allowance of 16 dwellings p/a for "vacancy and second homes" and an allowance of 108 dwellings over the Plan period for "concealed households". It is not made clear how these figures are calculated.

With regard to concealed households, ORS refer to their own 2015 SHMA, but both documents simply make the same assertion: "there has been a clear increase in concealed families over the period 2001-11, especially families aged 25-35..We have increased the growth in concealed households between 2001 and 2011 by a further 50% to reflect the potential growth until the start of the new plan period in 2016."

We accept and support the need to provide decent and appropriate accommodation for all citizens, particularly those in greatest need. However, we do not accept that the vague assertions in the ORS Update 2017 constitute a robust calculation of the level of need. Furthermore, as we discuss in a later section, we do not believe that DBC's approach to housing delivery is likely to provide accommodation suitable for, or accessible to, the most vulnerable families.

2) Site allocations

The standard process for determining site allocations is, first, to determine how many dwellings are likely to be required during a Plan period; secondly, to carry out a study currently known as the Housing and Economic Land Availability Assessment (HELAA) which lists all of the sites and broad locations which may be available for development within the Plan period, and assesses their suitability for development and the likelihood of development coming forward. The assessment should consider the size and location of the site; its current use; physical constraints to development such as access or steep slopes; "natural features of significance" and "environmental constraints"; and an "initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

The local authority then use the HELAA as the primary piece of evidence to determine which sites should be allocated for housing or employment use.

In this case, however, the process has some very serious shortcomings.

a) Inaccurate assessment of need.

As we discuss above, the objectively assessed need (OAN) for Darlington, which proposes a need for 166 dwellings per year, has been rejected in favour of a highly dubious document which suggests that there is a need for nearly three times as many – 492 dwellings per annum.

b) Disregard for existing commitments.

The 2019 5-year Housing Land Supply Position Statement (5YPS), which correctly employs the OAN, states that over the period 2018 – 2013, the Borough will require 885 dwellings. However, as it says, in 2018-19, DBC saw the development of 476 dwellings. Only 409 more are therefore required by 2023, plus a buffer of 5%, i.e. 430 dwellings, or 86 p/a.

However, as the 5YPS states, 1791 *additional* dwellings have already received planning permission, meaning that not only have the requirements of the next 5 years been met (430 dwellings), but the requirements of the next 7 years after that.

In fact, the 5YPS understates the situation. As well as listing sites classified as "commitments" it lists a number of other "potential allocations". Several of these, however, have already received planning permission (one, Allington Way, only in part) – providing another 1214 dwellings. [2]

That is, in February 2019, 476 dwellings had been constructed and a commitment had been made to build 3005 more – a total of 3481 dwellings. The total housing requirement over the Plan period is 3310 dwellings. This had already been surpassed, by February 2019, by 171 dwellings.

c) Allocating land in excess of its own requirement.

The 2018 Plan acknowledges commitments of 3116 dwellings (the figure given is 3089, but the commitments listed add up to 3116), plus allocations of 8120 over the Plan period (again, the

[2]Another three sites – South Coniscliffe, Mowden Hall, and Maxgate Farm – are listed as "pending" or "subject to application". These total another 796 dwellings.

figure given in the Plan – 7965 – is lower than the total of the allocations listed). So, allocations and commitments together equal 11,236 – 1,396 more than even the inflated requirement in the ONS document. It then allocates land for another 5075 dwellings – a total of 16,311 dwellings.

No justification is even attempted for this. There is no acknowledgement of the fact that too much development – or, if the market dictates location, the right amount of development in the wrong places – may have negative impacts upon environment and society.

d) Sprawl.

There is no standard figure for how many dwellings can be accommodated within a hectare of development land. The Government's advice on HELAAs states, "The estimation of the development potential of each identified site should be guided by the existing or emerging plan policy including locally determined policies on density." It does not specify what these densities should be.

Theoretically "ideal" densities vary wildly: Welwyn Garden City was built at 25 dwellings per hectare (dph) as a reaction against the overcrowding of the industrial slum, whereas Jane Jacobs, the great twentieth-century urbanist, argued that, in cities at least, 100 dwellings per acre - or 247 dph – would be too low . [vi]The current draft of the London Plan proposes a range of different densities for different settings and dwelling sizes, ranging from 35 dph to 405 dph[vii].

While very high densities are not suitable in all settings, *in general,* higher densities help to minimise environmental impact. Firstly, higher densities limit the requirement for building land. Secondly, higher-density development has been shown to consume less energy in use. Thirdly, higher-density development limits the need to travel because destinations (such as schools and employment sites) are closer to people's homes. Fourthly, it is easier to service higher-density development by public transport – and thus decrease the need for the private car – because a greater number of people live within walking distance of each bus stop. Transport fuel savings can be anything up to 30%. [viii]It's worth noting that the same applies to shops, restaurants and other businesses: where more people are gathered together, these businesses are more likely to survive.

The Draft Local Plan recognises these points, to some extent. It states:

"Proposals for housing development will be expected to have regard to the Council's Design of New Development SPD (2011).. and should achieve an appropriate density; promoting the sustainable use of land for development .. Higher densities will be supported within areas with a particularly high level of public transport accessibility."

The Design of New Development SPD itself is more specific. It states: "New housing development should provide for an average density of 30-50 dwellings per hectare... Higher densities are encouraged within and on the fringe of the town centre, near to strategic and local public transport hubs.., around district and local centres and along key public transport corridors."

But this (still really rather low) density is barely ever seen in new development in Darlington. Higher-density development of 30-50 dwellings has been seen on some small sites found in the 5YPS, but in general larger sites are developed at much lower densities – the most significant example being West Park Garden Village, with 1200 dwellings on 79.32 ha – a density of 15.12 dph.

Recent approvals have continued this pattern, and the extremely large allocated sites of Greater Faverdale, Skerningham and Great Burdon have densities of 11.2, 9.1 and 14.1 dph respectively.

This is a greedy use of the countryside, not only consuming it for unnecessary houses, but also doing so in a wantonly wasteful way.

e) Disregard for demographics

The modest increase in households over the Plan period is predicted to be almost entirely due to an increase in smaller households. Life expectancy is increasing slightly, which means, firstly, that, all other things being equal, the total population will rise slightly (by about 1.5 % in between 2016 and 2036); secondly, that a greater proportion of households will be couples or single people whose children, if any, have left the parental home.

The number of families with dependent children over the Plan period is actually set to decline slightly (by 1.6% between 2014 and 2039).

The Local Plan states that development "will be expected to provide an appropriate mix of housing types, sizes and tenures which meet local needs". But there is actually no indication that the housing allocations made in this Plan will meet local needs. Older people in smaller households require smaller dwellings, particularly if they have low incomes or mobility problems. Particularly for older people without access to a car (which includes 61% of single people over 65 in Darlington) there is a need for easy access to shops and recreational, social and health facilities.

The sort of low-density, sprawling, car-oriented development which is proposed for the housing allocations within this Plan ignores the requirements of those whom it is allegedly intended to serve.

This might be justifiable if there were an existing imbalance in the housing market – perhaps a shortage of family houses. But the statistics say otherwise. The vast majority (86.6%) of dwellings in Darlington at present are houses – 17.5% detached, 38.2% semi-detached, 30.8% terraced. The majority of all dwellings have 3 or more bedrooms. [ix]

DBC is planning for a need that doesn't exist, and therefore ignoring a need that does.

f) Unjustifiable choices

To a great extent, town planning is *about* site selection, or at least about determining what *sort* of sites should be built upon. Notwithstanding the importance of good design, a well-designed development on an inappropriate site is still a failure of planning.

The Government's guidance on site allocations states that, when allocating sites, LAs should consider:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;

- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas[x].

We would argue that this list is disgracefully weak in terms of environmental impact. Most importantly, it fails to consider the impact of site selection on non-site-specific environmental issues, in particular, climate change mitigation and adaptation, traffic and air pollution.

This, however, is covered in the National Planning Policy Framework (NPPF) [xi]which states that "The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

In this context, it's important to remember that development is a massive source of carbon emissions in itself. The construction of a masonry house entails the emission of about 52.5 tonnes of CO^2[xii]; depending on the land conditions prior to development, it may entail the removal of carbon-sequestering vegetation.

As we state above, low-density, car-oriented sprawl generates a particularly high amount of CO^2 in use, from heating, lighting and other domestic sources, and from the increased car journeys that its dispersed nature makes obligatory.

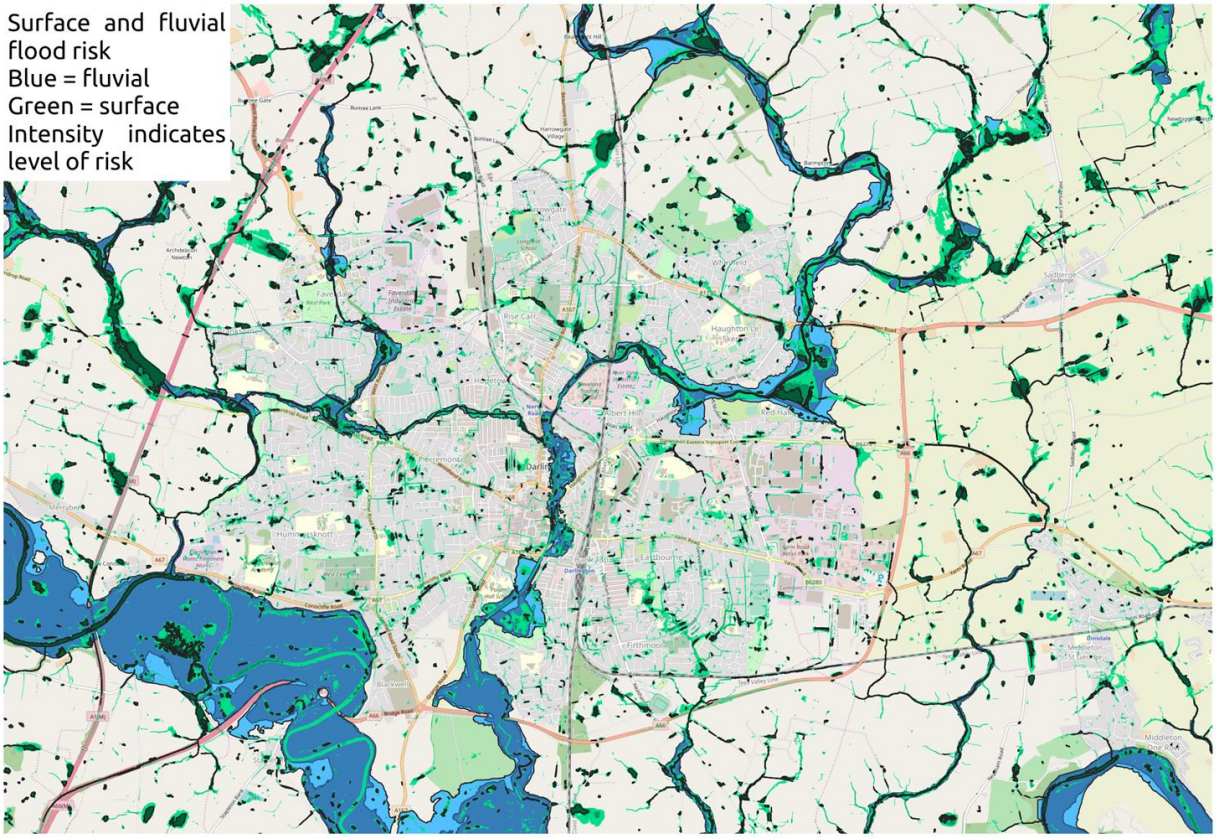
Rather than allocating sites with reference to the impact upon the national and global environment, however, Darlington's Local Plan simply appears to allocate everything that is available at present – and then some more. A rather cursory assessment of each of the housing sites put forward has been carried out. If the site is up for sale, if there are no reasons why development upon it might not be feasible – lack of sewerage, water or highways, high flood risk – and if there are no known "environmental constraints" upon it – i.e. protected species or archaeological sites – the site is deemed to be "suitable".

Following this methodology, DBC have allocated a number of very large sites, apparently without proper ecological or archaeological assessment.

- All but a few small infill sites are on greenfield sites in the countryside which have never been developed.
- Most are separated from facilities and services in the town by main roads, railways, natural features or blocking development, so that walking or cycling the relatively short distance to the town centre would in most cases be lengthy and unpleasant.
- All are planned at extremely low density, so that development consumes more land than is required for the number of dwellings (which, in any case, are not actually needed)
- Most have no provision for on-site facilities and services; the exceptions are the absolutely vast Skerningham and Greater Faverdale sites, each of which, theoretically, is supposed to contain a "neighbourhood centre" but both of which are too big for any centre to be within walking distance of all but a small proportion of new residents.
- All contain areas of flood risk (see Map A)[xiii]

- Since the site assessment entails no site investigations, there is no way of telling what habitats and species are found upon site. (We know from the Government's Priority Habitats Inventory that there are pockets of broadleaved woodland on the Skerningham site, and we know – as the HELAA admits – that there are great crested newt populations in the vicinity. Local nature photographers have also captured shots of red- and amber-listed species in the Skerningham area. But we simply do not have a comprehensive understanding of what habitats and species are likely to be lost if development goes ahead, and nor do DBC.

Map A: Surface and fluvial flood risk around Darlington.



Since the Plan was drafted, as the 5YPS explains, development on some of these sites has already been given permission. DBC have, in other words, allocated sites without due care and attention in a draft Plan, and then started to permit development upon them as if the Plan had already been adopted.

There is one extremely significant *omission* from the list of housing sites: the Town Centre Fringe. This site – identified in the Plan itself as "over 70ha of land, buildings and roads, much of which is underused" *should* be the Plan's absolute priority. It has the potential to bring more residents into the town centre and thus support existing and new businesses. A regenerated Town Centre Fringe, as the Plan identifies, could be a sustainable mixed-use community with housing, retail, leisure and other employment uses provided close to one another, minimising the need to travel for new and existing residents, and helping to develop a network of safe cycling and walking routes. (Addressing car dominance as part of an overall strategy could contribute towards this process by

enabling the re-use of the large areas of car-parking around the town centre, which, in themselves, are currently economically and socially inactive, as well as being visually unappealing.)

But brownfield sites are more complex and costly to develop than greenfield sites and developers naturally prefer to develop the latter. In the context of a Plan like Darlington's, where there is an absolute superfluity of pristine, flat, greenfield sites, it seems relatively unlikely that any developer would choose to invest in the Town Centre Fringe. It looks set to remain as it is – a smaller version of the well-known "doughnut of deprivation" phenomenon found in many of our cities, where investment is focused either on the centre or on newer suburbs on the outskirts. In this case, however, where, as in many smaller provincial towns, the town centre is struggling, there is a need for intervention to bring more residents within walking distance of the centre, support new local businesses and regenerate run-down areas. A lack of investment in the Town Centre Fringe looks set to undermine the Town Centre itself.

3) Road proposals

The Local Plan asserts (policy IN1) that the Council are committed to "delivering an efficient transport system with a focus on the provision of infrastructure improvements to encourage greater use of sustainable modes". We welcome that assertion, but we do not feel that it is borne out by subsequent policy.

Policy IN1 expresses a desire to build at least seven new roads, perhaps more:

- West Park Garden Village - link road connecting Edward Pease Way to Newton Lane;
- Stag House Farm - link road connecting Newton Lane to Staindrop Road;
- Coniscliffe Park - link road connecting A67 to Staindrop Road;
- Link 66 / Symmetry Park - link road connecting the B6279 Tornado Way to B6280 Yarm Road;
- Burdon Hill - link road connecting A1150 to B6279 Tornado Way and new link road to Red Hall;
- Skerningham access roads;
- Faverdale link.

Policy H10 additionally refers to "Safeguarded corridors sufficient to enable the provision of the inner Northern Link Road route option or a local distributor road between the A167 and A66 Little Burdon roundabout, or/and, a connection to the outer Northern Relief Road route option across the River Skerne as required".

It is difficult to critique these proposals, since so little information is provided upon them. The Plan makes reference to transport modelling which has been carried out on the basis of the Local Plan housing and employment allocations, which finds that there would be additional traffic at certain points should these sites be developed; but it provides no detail on how the roads proposals were developed, nor whether alternative measures were considered. Nor does the Document Library provide any supporting information.

The Plan asserts that additional capacity on the road network is needed because, without it, "the strategic and local highway networks.. will become more congested and unsafe.. deterring or restraining development." It admits, however, that congestion is low in Darlington in comparison with other locations in the country.

Are these road proposals the "local or strategic infrastructure" that new development is expected to "facilitate"? Have the immense allocations of housing land been made not to fulfil a need for housing, but to fund road-building?

If so, we would urge DBC to think again, for the following reasons:

Firstly, increasing capacity is an extremely inefficient way of dealing with congestion. Typically, traffic volumes within a highway network increase by 20% in the immediate aftermath of a new piece of highway infrastructure being provided. In subsequent years, they may increase by anything up to 178%, so that typically, congestion levels return to their earlier position. [xiv]

Secondly, there is no evidence to suggest that road-building has any effect upon economic growth at all – or, to put it the other way, no evidence to suggest that congestion has a negative effect

upon economic growth.[xv] In fact, some of the most congested places are the most economically vibrant; and roads justified on the grounds that they would increase growth have typically not succeeded in doing so. Figures stating that there is a "cost" to congestion generally work by putting a value on drivers' time[xvi]; we do not believe that it is reasonable to make an equation between private inconvenience, and public cost.

Thirdly, roads invariably cause the destruction of everything along their route. As discussed earlier, we have very little information about the habitats, species, landscapes and archaeological artefacts which may be affected by the Plan; this is true of roads as it is of housing.

Fourthly, and perhaps most importantly at this time of accelerating global heating, increasing the capacity of a road network typically increases associated greenhouse gas emissions in proportion with the increase in traffic. We do not believe that a decision to emit more carbon should ever be taken lightly.

Fifthly, prioritising road construction inevitably means that funding and action on more sustainable options, such as good walking and cycling networks and public transport improvements, are not funded. This directly contradicts DBC's own excellent "Healthy New Towns" document, which establishes a commitment to the sustainable transport hierarchy, which prioritises walking and cycling, then public transport, and only then considers the needs of the private car.

In conclusion, we have very little information to make us think that these road proposals are necessary, or that the alternatives have been properly considered. What we *do* know is that road-building is *always* expensive, *always* leads to the destruction of everything upon the route of the road, typically leads to an increase in traffic, air pollution and greenhouse gas emissions, typically does nothing to address congestion, and typically has no impact upon economic growth.

4) Other significant shortcomings

Policy IN1

While we appreciate this Policy's assertion that it seeks to increase use of sustainable modes, we question the appropriateness of the final phrase in policy IN1: "leading to less reliance on single occupancy vehicle journeys." Reducing single-occupancy *car* journeys is, indeed, one aspect of sustainable transport planning; but the *overall* objective should be to reduce the environmental impact of transport while ensuring that people have access to facilities and services. One important means of doing so, particularly in a small town on relatively flat terrain, should be to foster cycling, particularly for local journeys – hence, almost by definition, fostering single-occupancy vehicle journeys. The policy bears witness to a general failure to consider that a bicycle can be a "vehicle".

This failure is demonstrated again in clause b of the policy which argues that cycling and walking can be fostered by supporting the development of the "Strategic" and "Local" Green Corridors identified in the Darlington Green Infrastructure strategy. These corridors, pleasant as they are for recreational and habitat purposes, are not specifically located so as to provide links between origins (where people live) and destinations (where they want to go). Except where they happen to do so, they are an irrelevance to strategic transport policy.

Again, this policy contradicts DBC's own "Healthy New Towns" document, which contains a commitment to the sustainable transport hierarchy, prioritising walking and cycling, then public transport, and downgrading the prominence of the private car. New developments should be designed to make sustainable transport the most convenient, quickest, safest and pleasantest way to travel around the town.

These aspirations for "Healthy New Towns" should be extended to the existing town as well. Rather than relegating active travel to the spaces and routes which are not currently wanted by motorists, it should be reallocating highway space from private cars to walkers, cyclists and buses. creating a town-wide network of safe and segregated walking and cycling routes, and decent public transport services, which offer all citizens a genuine choice of transport modes. It should aspire towards the return of efficient transit, like trams or guided buses, in the town. The overall aim should be to increase the spatial and energy efficiency of transport.

On this note, it is worth pointing out that increasing accessibility to town centres by sustainable modes has considerable benefits for local economies: residents are more likely to shop locally, have more money to spend if they save money on driving, and have more investment in their local community[xvii].

Policy IN4

This policy states that "the Council will continue to ensure that there is an adequate supply of safe, secure and convenient public parking.. New development will be required to provide safe and secure space for parking." This insistence that all development *must* provide for the needs of drivers is absolutely contrary to the assertion in policy IN1 that DBC seeks to bring about modal shift. Allocation of public land for parking (particularly at no or little cost) is, in effect, a subsidy to drivers; rather than prioritising one group of travellers, DBC should be trying to ensure that the money they spend, in funds or in kind, on users of all modes is equitably spent, and that, in new

development, the requirements of all road users are equitably considered. That by no means signifies that DBC should provide *no* public parking. It does, however, mean that DBC should carefully consider the overall economic value of land allocated for this purpose, and it also means that DBC should not look unfavourably upon development if the developer believes that it has no need for dedicated parking.
Furthermore, DBC should consider the economic value, environmental impact and social justice of providing free or discounted parking. Ideally, drivers should be expected to pay the full cost of parking and the money recouped by the Council to fund sustainable transport improvements.

Policy IN 9

This policy states that "the council supports applications which includes innovative, energy efficient infrastructure supply and active usage of renewable energy". However, with regard to wind energy development, it simply repeats the Government's own strictures on this matter:

"a) Wind energy development applications of one or more wind turbines should only be granted planning permission if:
i. the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
ii. following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing."

Since the policy identifies no sites as suitable for this purpose, however, it effectively forbids wind turbine development across the Borough during the Plan period. DBC must identify suitable sites for wind energy development and establish a target for renewable energy generation over the Plan period.

Conclusion

The NPPF – the Government's key document summarising the principles of planning in the UK – lists three objectives for planning:

a) an economic objective...ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective...ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces...

c) an environmental objective...protecting and enhancing our natural, built and historic environment; including making effective use of land...using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change…

We argue that this process fails to meet any of the three objectives for planning, as follows:

Economic

As we discuss above, there is no particular *reason* why allocating additional land for employment should mean that employment increases, given that there is no shortage of it at present. The allocation of large amounts of housing land, meanwhile, simply generates wealth for landowners and developers.

The Plan's failure to prioritise the Town Centre Fringe by limiting development elsewhere, especially in a context where the residual requirement for housing is very low, is a missed opportunity to support the regeneration of the Town Centre. DBC must prioritise the re-use of this area for housing, thus bringing more people into the town centre and providing a critical mass of potential customers who can help to support new and existing business in the Town Centre and its Fringe.

The Plan's failure to allocate any sites for renewable energy is a missed opportunity for the renewable energy industry in the area. As it correctly states, wind turbines may not be permitted at present outside an area specifically identified for that purpose. Therefore the Plan essentially forbids wind turbine development within the Borough.

The proposals for roads through the countryside is economically disastrous: it entails spending a lot of public money on infrastructure which generates no economic benefit at all, but which could be responsible for undermining the town centre by diverting trade to out-of-town locations.

Social

As we discuss above, the Plan fails to meet the needs of the people who are predicted to live in Darlington over the Plan period. It fails to specify that the majority of dwellings built in the Borough should be built for smaller and older households. Instead, it allocates vast swathes of housing for low-density sprawl – a type of housing singularly ill-suited for this type of household, in terms of size, location or price. It is particularly unsuited to the vast majority of older people who

have no access to a car or van. It is also ill-suited to people on low incomes, both in terms of price and layout.

The failure to prioritise the regeneration of the Town Centre Fringe could have significant impacts for all of the people of the Town, because of the strong likelihood that continuing dereliction in this area will continue to undermine the Town Centre. A dying town centre means a loss of facilities and services, a loss of culture, and a loss of community. It has particularly brutal effects upon the large proportion of Darlington's population who have no access to a car or van.

Environmental

The Plan will have the following negative environmental effects:

- In terms of climate change, the construction of 9411 more dwellings than the OAN, over the Plan period, is quite wantonly destructive. Assuming (conservatively) that each dwelling might be responsible for 50 tonnes of CO2 equivalent in construction, this amounts to 470,550 tonnes, or - assuming that each of Darlington's approximately 104,332 citizens is responsible for 5 tonnes of CO2 a year – about as much carbon as is emitted by the entire town in a normal year.
- Very large areas of habitat will be lost. Given the lack of detailed freely-available ecological information on the sites in question, it is impossible to say just what sort of habitats will be lost, and what species will be affected, but it is known that protected species live nearby.
- The very low density of the sites, their separation from the town, and the paucity of local facilities and services planned within them, means that they are likely to generate more car journeys as residents will have little choice but to drive.
- The car-oriented nature of many of the transport policies – the insistence on high levels of parking, the failure to provide properly for cycling and walking – is likely to add to the number of car journeys.
- The proposed large number of new roads through the countryside will destroy habitats, affect air pollution, and add to greenhouse gas emissions. Alternatives to the proposals do not appear to have been considered or costed and there are indications that the desire for infrastructure has affected site allocations, insofar as more land is needed to raise money.
- The failure to prioritise the Town Centre Fringe is likely to further undermine the Town Centre and thus lead to the continued degradation of not only the Fringe but the Centre itself. The loss of town centre facilities and services would generate yet another increased demand for car journeys, as people would be obliged to travel further to access them.
- The effective ban on wind turbine development will undermine efforts to increase renewable energy usage in the Borough.

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