



Darlington Green Party (1250913)

Response to Inspector's Matters, Issues and Questions on the Darlington Local Plan

Blue Kayak Planning for Darlington Green Party

Matter 7 – Economic Development

Q7.1

As we state in our responses to Matter 2, the anticipated need for employment land is based on a very perfunctory evidence base. The single piece of evidence accepted for use in making predictions about employment figures over the Plan period is the Business Register and Employment Survey; the figures from this source are taken to indicate a strong growth trend in employment numbers from 2005- 2015, when in fact the number of jobs in the Borough fluctuated over this period, with no, or very little, correlation between number of jobs and time. This is a relatively short period over which to look for trends regarding jobs, and long-term extrapolations from such short-term trends are statistically dubious. The predicted number of jobs is then used to predict floorspace requirements; but then, rather than using net-to-gross multipliers to predict land requirement – which would have yielded a land requirement of some 31.24ha over the Plan period – the Plan asserts that a further 175.9 ha is necessary. This is despite the fact that, as policy E1 states, there is already 53.74 ha of employment land available on existing sites (37.62 ha net). That is, the proposed allocations of employment land are surplus to requirements and therefore unsustainable. Indeed, some of this existing employment land is being reallocated to housing / mixed development at Faverdale and Lingfield Point due to it not having been used, despite its long-term allocation for employment uses. This is not to say that learning from mistakes is not a positive, with reallocation of land in more suitable / desirable locations for business and industrial purposes, but the need for allocation of additional land over and above that which is currently being reallocated for other purposes is not well demonstrated.

Almost all of the sites allocated are severed from the existing urban fabric by busy roads, watercourses or other linear features, or by impermeable development patterns in adjacent areas. No consideration appears to have been given, in the allocation of new sites, to the travel mode of employees on and to them. Sites should be allocated by preference where employees can reach sites by active and public transport, either existing routes or planning in new corridors into development (through existing urban areas), to be achieved e.g. through Section 106 agreements or equivalent as part of individual planning permissions as a condition for development on these sites. This would allow workers and visitors to get there via sustainable, healthy and low-carbon means, so development can continue without increasing carbon emissions or damaging the existing fabric and society of the town with traffic health and safety concerns.

There is no attempt to allocate land close to existing rail lines, for example, to allow more sustainable distribution opportunities, or identify sites which may be more appropriate for the green jobs of the future e.g. cargo bike and electric vehicle distribution sites, or indeed planning in adjacent renewable energy sites to supply new or existing industrial estates with their high energy need.

The information available regarding these employment allocations is even more sparse than for housing sites. Again, no ecological assessment has been carried out prior to the sites' allocation. No landscape sensitivity study has been carried out on any employment site. The Heritage Impact



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Assessment only covers three large sites (Faverdale, Ingenium Parc and Durham Tees Valley Airport). The lack of adequate ecological surveys is unacceptable. In recent years permission has been granted in the Borough for schemes with insufficient ecological assessment, which have subsequently had impacts upon protected wildlife. An example is the development of a car park on Alderman Best Way in recent years, where the risk of protected species was deemed to be low despite being within close proximity of multiple ponds. Now constructed, the drainage gulleys of the car park have become death-traps for frogs, toads and newts in breeding season, with local campaigners fighting for the council to install safety grilles to prevent them falling in.

It should be remembered that the allocation of an employment site is as significant as the allocation of a housing site in terms of the potential impact upon features of value upon the site. Depending upon the use of the site, the impact may in fact be greater in terms of landscape impact, amenity, pollution and greenhouse gas emissions.

In general, the allocation statements at Appendix B of the Plan are rather weak and vague, as they are with regard to housing sites. Some reasonable and justifiable statements are made regarding the protection of heritage assets on the very large sites at Ingenium Parc and Teesside International Airport South, both of which may contain features of historic significance. The allocation statements also mention the need for an ecological assessment and for the development at Ingenium Parc (but not Teesside International Airport) to incorporate SUDS. However, the fact that these statements do in fact respond appropriately to the information contained within the Heritage Impact Assessment highlights the paucity of information regarding other constraints on these sites; the allocation statements cannot mandate adequate mitigation for the impacts of development on site, since the Council do not have enough information to determine what those impacts are likely to be. Insufficient information has therefore been gathered in order to properly make any allocation.

Specific comments on the larger new employment allocations are as follows:

Greater Faverdale: the Faverdale site is discussed in detail in our response to Matter 4 – Housing Development. The only matter to add is that little consideration has been given to the commuting requirements of employees on this site. It is largely severed from the existing urban area and the alternatives to the private car are generally not acceptable (there are no safe cycle routes to and from practically all other parts of the town, because the only route in and out of the site is along the busy and inhospitable West Auckland Road (there is an off-road cycle path along part of this route but it is a shared path with pedestrians and does not have priority over junctions; there is also the Black Path from Whessoe Road / North Road area - but this is an unlit dirt track so may be considered unsafe or undesirable for commuting, especially by night-shift and female staff); public transport services are likely to be difficult to establish at Faverdale because of the isolation of the site and the dispersed and low-density nature of development upon it). This means, firstly, that work upon the site would be largely inaccessible to people without cars; secondly, that the site, if developed as planned, would generate a large amount of traffic, with consequent air, noise and light pollution, greenhouse gas emissions, and congestion.

Ingenium Parc

This site is perhaps the most acceptable of the many larger industrial allocations: it is adjacent to existing built-up areas on two sides, is relatively well-connected and has fewer important



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constraints. However, the development of any greenfield site has environmental impacts, and if a site's development is unnecessary, the benefits of development cannot possibly outweigh the negative impacts; it cannot, therefore, constitute sustainable development.

The site has the following constraints:

Habitats: the site is adjacent to the Maidendale Fishing and Nature Reserve. Aerial photographs show scrub and hedgerows on the portion of the site adjacent to the nature reserve, which are likely to provide a buffer for it and help to link it to wider ecological networks.

Amenity: the site is adjacent to Tommy Crooks Park. "Bad neighbour" development here would undermine the value of this facility.

Flooding: the site contains considerable areas of surface water flood risk.

Heritage: The site of a possibly prehistoric settlement has been found on site, with ring-ditches, pits, post-holes and possible hearths, together with finds including pottery, animal bone and other artefacts. These are "characteristic of activity dating from the Bronze Age to the Roman period"¹. Another "linear feature" has been identified on site.

The site is also adjacent to three Grade II* listed structures on the Cummins Engine Factory complex.

Teesside International Airport South

This site is distant from the existing built-up area. It is located to the south of the Teesside International Airport's runway, on the opposite side from the town of Darlington itself, and from the Teesside Airport rail station (only served by a skeleton service at 10am on Sundays). Although there are (very infrequent) buses to the airport, these do not, of course, go to the site itself, and the relatively new TeesFlex bus service is unlikely to be suitable for daily commuting (and may only allow use by residents of the rural areas, not those who need to commute there). The allocation of this site absolutely fails in terms of the NPPF's requirement at para. 103, "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

Furthermore, the site has the following constraints:

Habitats: although there is little information about the habitat value of the site, aerial and terrestrial photos show scrub and grassland on site; since portions of it have not been intensively managed for several decades, there may be wildlife and features of interest on site.

Flooding: there are pockets of surface water flood risk on site.

Heritage: the site is actually of considerable historical interest due to its use as the RAF Middleton St George Airfield during the Second World War and Cold War. Apart from the demolition of most upstanding structures, the site is largely unchanged since the airfield fell out of use. Historic features on site include pathways, earthworks, loading bays and an intact Cold War bunker. The site is also close to the Grade II listed, 13th-century Church of St George, Low Middleton.

¹ [sd30-heritage-impact-assessment-solstice-heritage-2019.pdf \(darlington.gov.uk\)](https://www.darlington.gov.uk/media/1250913/sd30-heritage-impact-assessment-solstice-heritage-2019.pdf)



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The proposed addition to Policy E2 - regarding the use of planning conditions to ensure that facilities for offices, research and development or light industrial uses - is questionable. Firstly, because, contrary to the requirements of NPPF 16.d, it is not “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. It is simply a statement of intent which cannot affect current planning decisions.

Secondly, because it isn't made clear in what circumstances these conditions would apply, or why they might be necessary. There is a rationale for resisting change of use from use class Eg to housing – firstly, to maintain the supply of employment properties; secondly, to resist housing development in unsustainable locations – but any such planning condition or Article 4 direction (which might be a more consistent way of achieving the same end) would have to be tailored to ensure effectiveness.

Q7.2

The Plan and its supporting documents do not contain a robust analysis of need, as we discuss above. However, the information within the Darlington Future Employment Needs Report (FENR) together with the list of existing employment sites provided in the Plan, indicates that there is already an ample supply of employment land. The Borough has 53.74 ha of employment land available; even if we adopted the predictions in the FENR, which are based on a very shaky evidence base, it would not be justifiable to argue for a need greater than 31.2 ha. In fact, the most robust prediction of need – provided by Oxford Economics – suggests a decline in employment over the Plan period. We acknowledge that a Plan which assumed decline would not be positively prepared. However, it is clear that, far from there being a risk of insufficient opportunities for land to meet anticipated needs, far too much land has been allocated.

Q7.5

The original version of Policy DC5 was, in fact, contrary to the requirements of NPPF 16.d, as it did not provide a clear indication to decision-makers of how to react to a development proposal. It was simply a statement of intent.

However, the policy could have been amended to make it sound, rather than deleted. It should, perhaps, have been reworded to require all development proposals over a given size threshold (for viability reasons) to ensure that a certain number of construction jobs would be provided in the form of training opportunities for people without qualifications from within the Borough, which does indeed suffer from high levels of those not in employment, education or training (NEET). Our preference would be for this policy to be retained and amended as suggested in order to make the Plan sound.