



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 9: Transport and Other Infrastructure

Q9.1

We are pleased to see the deletion of references to the Northern Link Road, since, as discussed below, the Plan's reliance on road construction is deeply concerning. However, this does not mean the Plan is sound with regard to transport. Firstly, because Policy IN1 lists several other roads, without justification. Secondly, because, as the 2015 SHLAA notes and as we discuss in our response to Matter 4, the development of most of the larger housing allocation sites in the Plan would have significant impacts upon the highway network. Further information is needed as to how the Plan would manage transport demand from allocated sites without the need for this road.

Q9.2

Contrary to the assertion made in the Council's response to PQ82, the schemes detailed in policy IN1 part C(vii) do not equate to an orbital route around Darlington, as sketched in the Key Diagram. There is at least one significant gap in the route not included within the Plan: a link between the A167 and Burtree Road. Confusingly, while this link features in the Strategic Transport Modelling Report 2021 (STMR), the Burdon Hill link from the A1150 to the B6279 does not.

This is consistent with the general lack of information about the road proposals. No detailed route maps have been shown for them. There is no assessment of the landscape, biodiversity, heritage and other valuable features along the route and the impacts of road-building upon these features, nor any assessment of impacts in terms of carbon emissions, air pollution, light and noise.

The Plan states that "the detailed traffic modelling indicates that the development within the Local Plan does not have a severe impact on the local and strategic highway network subject to the schemes identified in the Infrastructure Delivery Plan being implemented." But it does not consider the possibility that the roads are unnecessary – that is, that the Local Plan would not have a severe impact upon the local and strategic highway network even without the orbital roads. Nor does it consider the possibility that, if development led to significant travel demand, that this could be managed by facilitating and supporting active and public transport rather than by increasing highway capacity.

The STMR is presented as supporting evidence for IN 1. The implicit claim is that the roads are necessary to avoid unacceptable impacts of development upon the highways within the Borough. However, it is deeply flawed in the following respects:

- a) The assessment essentially works on a "predict-and-provide" basis: it estimates the number of additional journeys that would arise if a given number of additional dwellings were to be built and inhabited, and if a given number of new jobs were to be created; and then makes an assessment of the level of congestion that would arise if all those journeys were to be accommodated on the road network. The model "uses an iterative.. process to enable vehicles to reroute as journey costs..change" (2.6) but it does not consider the potential for modal shift - which the Climate Change Committee states is needed to meet the 78%



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emissions reduction target by 2035 of the Climate Change Act 2008¹ - or for the number, type or timing of journeys to change. Two false assumptions are made: firstly, that journey numbers are a fixed consequence of development; secondly, that the primary aim of transport management must be to ensure free-flowing traffic at all times by providing additional capacity where congestion is observed, and that this aim is more important than matters such as road safety, local environmental quality, community cohesion, and the reduction of air pollution and carbon emissions.

This method of transport assessment has been largely discredited over many years of research which have shown the inter-relationship between highway capacity, and volume of traffic. Increasing highway capacity tends to lead to an increase in traffic (typically, by 20% in the short-term and up to 178% in subsequent years)² and the consequent return of congestion. Meanwhile, tactics such as reducing road capacity, creating or improving safe and convenient alternatives to the private car, and planning the urban environment to reduce the need to travel, have been successful in reducing traffic volumes. In addition, changes in society and the economy can bring about changes in travel demand. This has been demonstrated during the coronavirus pandemic, when traffic volumes saw a sharp decline due to lockdown, roads became quieter, and therefore more people felt able to cycle and walk. However, some longer-term changes were already under way: younger people, and in particular younger males, are far less likely to have a driving license and to subsequently drive less than previous generation. This is particularly significant with regard to the need to reduce carbon emissions (discussed in our responses to Matter 1), air and noise pollution, and road traffic accidents. The Commission on Travel Demand recommends that traffic volumes should be seen as an outcome of transport policy rather than as an input to it: “decide and provide” or “vision and validate”.³

- b) The STMR was not produced until 2021. Therefore we do not know on what basis the decision was taken to propose the roads in the 2018 draft Plan. This is also a transparency issue, with this evidence being released to the public so late in the Local Plan process.
- c) The STMR bases its assessment, not even on the Plan’s predictions for housing and employment growth, which, as we say elsewhere, are very much inflated, but on much greater totals: 11,810 dwellings and 9,950 jobs. This is inconsistent, so not positively prepared or effective.
- d) No details are provided for the schemes described in the STMR. They are described only in the briefest terms, and, in the case of roads, no routes are given.
- e) The “Local Plan” scenario assessed in the Plan, which is said to represent the volume of development and the roads proposals put forward in the Plan, is, in fact, significantly different. Most of the roads proposed in the Plan also feature in the STMR, but two – the Burdon Hill link from the A1150 to the B6279, and its link to Red Hall – do not. Meanwhile, several new roads feature in the STMR which do not feature in the Plan:

¹ <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

² <https://bettertransport.org.uk/roads-nowhere/induced-traffic>

³ http://www.demand.ac.uk/wp-content/uploads/2018/04/FutureTravel_report_final.pdf



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- three phases of roads at Ingenium Parc
- a Central Park Link Road
- a link from the A66 at Blands Corner to the A1 at J57
- a road from the A167 to Burtree Lane.

The STMR also includes “Redhall Hall(sic)/ Burdon Hill..a road from Red Hall primary to link up with the B6279”. But this cannot possibly be the Burdon Hill road from the A1150 to the B6279.

- f) The STMR assesses only four scenarios: Natural Growth, Do Nothing, Development Only, and Local Plan. As well as roads, the “Local Plan” scenario includes a large number of junction improvements and other schemes to increase flow without increasing capacity. However, the STMR fails to assess anything less than the complete package of additional roads and highway improvements contained within it. It does not, for example, consider what impact there would be if the construction of new roads were avoided and the junction improvements alone were put in place.
- g) The STMR absolutely fails to consider the potential for policy-making to reduce the need to travel or to bring about modal shift away from the private car. This is a major theme within the government’s Transport Decarbonisation Plan⁴, and other recent active travel policies; the Transport Secretary, Grant Shapps, stated in 2020 that “Public transport and active travel will be the natural first choice for our daily activities”⁵. Reductions in travel demand, and modal shift to active travel, can be brought about by a package of measures such as: lower speed limits; narrowing roads to slow vehicular traffic to safe speeds at junctions and roundabouts; reallocating road space to sustainable active & public transport; and filtering roads to remove through traffic from residential areas. None of this is modelled in this report.
- h) The STMR does not appear to consider demographic changes or changes in working patterns over the next 20 years in its calculations. It states that “travel patterns and trip ends from the regional Voyager model have been used to distribute the trip ends to provide vehicle trip matrices” but there is no mention of the model having been adjusted to reflect different circumstances in the future. In fact, Darlington’s ageing population is likely to mean a proportionately smaller number of working people in the town in the future; a rise in home-working, accelerated by the Covid pandemic, may well continue; and an existing trend towards later car ownership and reduced driving among younger people may well continue⁶.
- i) Finally, and despite all the methodological flaws in the STMR, it does not, in fact, demonstrate that the measures within it would make a very big difference to congestion in Darlington. In general, both at the morning and evening peak, in all scenarios, most roads are not congested. The “Local Plan” scenario differs from the “Development Only” scenario in the following respects:

⁴ <https://www.gov.uk/government/publications/creating-the-transport-decarbonisation-plan>

⁵ <http://www.passengertransport.co.uk/2020/04/public-transport-will-be-natural-first-choice/>

⁶ See section 4.2.1 in http://www.demand.ac.uk/wp-content/uploads/2018/04/FutureTravel_report_final.pdf



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- In the morning peak, there is some improvement to congestion along the A68 through Faverdale and along a few small links through the town (West Road by the station; Allan Street).
- However, there is more congestion along the A68 through Pierremont (Woodland Road) and along Haughton Road.
- In most cases, road sections that are congested under “Development Only” are still congested under “Local Plan”.
- In the evening peak, the effect is somewhat more positive, as there are no road sections that are congested under “Local Plan” but not under “Development Only” and several sections which are less congested.
- However, again, most road sections that are congested under “Development Only” are still congested under “Local Plan”.

The proposed orbital route would be of limited use as a public transport route. For almost all of its route (so far as we know from the sparse information provided) the road goes through open countryside or industrial estates. Nor would the proposed housing developments make the orbital route very useful for public transport, since, as discussed in our response to Matter 4, their density would be too low to make public transport viable. Furthermore, the route doesn't go to any significant destinations. In fact it takes the form of a peri-urban orbital route whose only function is to enable motorised vehicles to circulate. It suggests car-dependent development and failure to design for sustainable transport and reducing the need to travel.

Since there is so little information about the routes of the roads proposed, and therefore almost no information about the impacts that they would have, we are unable to make a very informed comment about the balance of costs and benefits associated with them. However, we can say with confidence that they would destroy everything – in terms of features of habitat or heritage value – along their routes, cause an increase in air pollution, noise pollution and greenhouse gas emissions, and damage the landscape. Their cost to the Borough is also likely to be very significant. Given that one of the Plan's four Strategic Aims is to “deliver new development that is capable of facilitating local or strategic infrastructure”, the risk is that the aspiration to build these unnecessary roads will distort planning policy and decision-making, causing poor-quality development, or development in the wrong locations, to be permitted for the sake of developer contributions.

Q9.3

We agree that all “strategic priority corridors” should be defined on the proposals map. However, we do not consider that protecting these corridors, pleasant as they are for recreational and habitat purposes, is an effective way of fostering cycling and walking. They 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.

A better approach would be to identify a network of principal routes for active travel, from residential areas to the town centre, employment sites and other destinations. Within these true “strategic priority corridors” safe, direct and protected routes for cycling and walking, separated from motorised traffic, should be created. In addition, a network of safe cycling and walking routes should be identified and created throughout the urban area, linking to strategic routes. If developer



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contributions are obtained for transport projects as a consequence of development, these schemes should be prioritised rather than road-building.

Q9.4

In order to meet the Council's obligations under the Climate Change Act with regard to reducing carbon emissions, IN 1 needs to have stronger policies to improve facilities for cycling and walking across the Borough. It should mandate the development of a network of safe cycling and walking routes within the existing built-up area, linking in with similar routes in new development, and including sustainable transport priority corridors connecting residential areas with the town centre, employment sites and other destinations.

The policy should contain a requirement for developers to assess the potential increase in travel demand as a consequence of development, under a number of possible scenarios, and to demonstrate how increases in motorised transport will be minimised through design for active and public transport, and measures to reduce the need to travel.

Q 9.5

Sadly, the modifications suggested do not render policy IN2 effective, since provision of bus stops and extended bus services are insufficient to provide a safe, convenient and effective public transport service. The policy should seek to provide safe and easy access to public transport for ALL residents of the development not only "those who wish to use public transport". This requires ensuring the bus service provided operates at viable times of day suitable for normal commuting times and known shift patterns at major employers in the town, and at viable frequencies - of less than 20-minute intervals during peak hours and half-hourly through the rest of the day. Anything less than this will mean that many of the out-of-town development allocations will be accessible only by private car, with resultant unhealthy and polluting car-dependent lifestyles, which good planning is specifically directed to avoid in the NPPF. In our view this would therefore render policy IN2 unsound, as non-compliant with requirements to meet the targets set in the Climate Change Act 2008.

Q9.7

Deletion of requirements for adequate cycle storage provision in both commercial and residential development (IN1 A(iii) and IN2 part e) is inconsistent with national government's Transport Decarbonisation Plan⁵ and the requirement for the Plan to meet the Climate Change Act 2008 targets both of which require local and national government to foster modal shift towards walking, cycling and public transport. The claim is made that this is necessary to make the Plan compatible with the Tees Valley Highway Design Guide, but this is illogical. Firstly, because Tees Valley CA has not published a Highway Design Guide on its website and the document has not been provided within the Documents Library; it is not clear that such a document is currently in use. Secondly, because a Highway Design Guide, if it exists, would probably not set standards for the design of residential buildings. Thirdly, because if it did so, it would not be expected to prevent local authorities setting higher standards of their own. Fourthly, because requiring cycle parking in residential developments is entirely compatible with the Tees Valley Cycling and Walking Implementation Plan, in which the



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fourth Action in the Action Plan is to “increase the provision of cycle parking”⁷. These amendments must be reversed to make the Plan sound.

The first paragraph in policy IN.4 is not sound; it refers to an aspiration of the Council’s, rather than providing a clear indication of how decision-makers should respond to development proposals.

The statement “new development (including change of use) will be required to provide safe and secure space for vehicle parking ...for residents, employees, customers, deliveries, visitors and others who may visit the premises” runs contrary to the Plan’s assertion that it seeks to bring about modal shift. While developers will probably choose to incorporate parking within most developments, it must be possible for a development to take place (particularly within dense areas close to transport hubs) that contains little or no parking, e.g. Duncombe Barracks in York⁸. The Council must acknowledge that it is possible and in some ways desirable, for a household to live without a car, as, in fact, some 28% of households in Darlington did in 2011.

Q9.9

The NPPF itself is inconsistent with regard to wind energy. Local authorities are required to “support renewable and low-carbon energy” but a footnote states that wind turbines are only permissible “in an area identified as suitable for wind energy development in the development plan” with the backing of the local community. This means that, unless the local authority has identified suitable areas for wind turbines, they are effectively forbidden within the area; but the NPPF only requires local authorities to “consider” identifying such sites.

Following major modifications, the Plan states that wind energy proposals are permissible across the Borough. We are pleased to see this amendment. However, we are concerned that its compatibility with the NPPF might be called into question, since it does not specifically identify suitable sites. DBC should commission an assessment of the suitability of the Borough for wind (and other renewable energy) development, and its constraints, so as to provide a map of potentially suitable sites, such as Stroud’s Renewable Energy Resources Assessment⁹.

The 300-home cut-off above which district heating must be considered is excessively high and there is no practical reason for this. Given that new gas boilers cannot be installed from 2025, this should be considered at a much lower cut-off. 30 homes would be a more appropriate threshold.

⁷ [Tees-Valley-Cycling-Walking-Implementation-Plan-2020.pdf \(teesvalley-ca.gov.uk\)](https://www.teesvalley-ca.gov.uk/tees-valley-cycling-walking-implementation-plan-2020.pdf)

⁸ <https://www.york.gov.uk/NewHomesAtDuncombeBarracks>

⁹ <https://www.cse.org.uk/downloads/reports-and-publications/planning/renewables/stroud-renewable-energy-assessment-2019.pdf>