



## Responses to Inspector's Supplementary Questions

### NPFSQ1

The recent revisions to the NPPF have reinforced the need to consider the sustainability and design of new development. This supports the argument of Darlington Green Party that the current draft of the Plan is unsound in its current form, because it fails to adequately take these matters into consideration.

The relevant changes are as follows:

Paragraph 7 includes the words "members of the UN have agreed to pursue the 17 Global Goals for Sustainable Development."

All of these goals are in some way relevant to planning, but perhaps the most relevant is goal 11: "Make cities and human settlements inclusive, safe, resilient and sustainable". Sub-targets within this goal include "strengthen efforts to protect and safeguard the world's cultural and natural heritage", "provide universal access to safe, inclusive and accessible green and public spaces", and "provide access to safe, affordable, accessible and sustainable public transport for all, improving road safety". The current Plan fails with regard to all of these targets. The allocation of Skerningham, in particular, would have a devastating effect upon a site of cultural value and natural heritage, and remove existing access to safe and valued green spaces. The general strategy of the Plan – allocating large areas of land for housing at low densities, without good links to the town centre or other destinations by public or active transport – is likely to mean a larger number of people without access to a good public transport service.

Another relevant goal is Goal 13: "Take urgent action to combat climate change and its impacts". As we have previously stated, the current Plan is, in effect, climate-blind. It establishes a low-density, sprawling, car-dependent pattern of development; deals with increased traffic simply by building more roads, rather than by attempting to bring about modal shift or reducing the need to travel; and allocates land for housing in areas of flood risk, apparently without consideration for the need to plan for flood mitigation as extreme weather events become more frequent and severe.

Paragraph 11 includes the words "All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects."

This paragraph is particularly significant as it falls within the NPPF's definition of the "presumption in favour of sustainable development", which, it says, is "at the heart of the Framework." That is, the stipulations in this paragraph are absolutely fundamental to the NPPF's strategy and cannot be ignored.

Clearly the requirements in paragraph 11 are *not* being met by the current Plan. Its highly dispersed and car-dependent pattern of allocations, its reliance on road-building as a means of dealing with



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traffic - worsening not mitigating climate changing emissions and air pollution - and its allocation of land of biodiversity and cultural value, subject to flooding, for development, are completely inimical to these principles. As for making effective use of land in urban areas, again, the Plan fails; although it permits new development in the Town Centre Fringe and elsewhere within the urban area, it does not prioritise it – in fact its very large allocations of greenfield land are likely to deflect attention and funding away from the town centre where development is needed and would most benefit the town's economy.

Paragraph 73 and many later paragraphs strengthen the NPPF's focus on "tools such as masterplans and design guides" and area-based character assessments (para 125). Para 127 requires local authorities to produce "design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code" ; paragraph 129 specifies that, to carry weight, these should be "produced either as part of a plan or as supplementary planning documents". It also states "all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area."

The current draft of the Plan pays rather less regard to design than previous iterations thereof. As we have seen, the masterplan and design codes for the large development sites are to be produced in the future, rather than being provided along with the plan. Meanwhile, the Council's existing (and excellent) SPD on the design of new development has been downgraded within the Plan process, from something that must be "followed" to something that must be "considered". The requirement for Healthy New Town principles to be followed in the design of Skerningham has been dropped from the latest iteration of the Plan.

Para 110 requires "the design of streets, parking areas and other transport elements to reflect national guidance". This is significant with regard to the incorporation of LTN 1/20 within highway design; it is not clear from the Plan that it will be required in the design of new highways and cycling infrastructure. It is to be used with regard to cycle parking - but only until December 2021, when it is to be superseded by a new local guide.

Paragraph 161 requires development to make "as much use as possible of natural flood management". While the avoidance of development in high flood risk areas, SUDS and reduction of run-off from development sites are in theory invoked in policy DC2, the allocation of sites including Skerningham and Faverdale, which not only contain areas of flood risk themselves but whose development could radically affect flood risk in the existing urban area, runs contrary to this.

Paragraph 180 states that "opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate." The Skerningham development, in particular, will have a negative impact both on biodiversity and on public access to nature; and the cursory nature of design clauses in policy H10 give little confidence that biodiversity will be incorporated within the development.