
**LOCAL PLAN: MAKING AND GROWING PLACES
PREFERRED OPTIONS 2013
CONSULTATION RESPONSES AND NEXT STEPS**

SUMMARY REPORT

Purpose of the Report

1. To brief Scrutiny on the outcome of public consultation on the Local Plan: Making and Growing Places Preferred Options (MGPPPO) and seek members views. It also outlines recommended actions and the next steps in preparing the Local Plan and the new information that will need to be considered in doing so.
2. A copy of the MGPPPO is available in the Members Room and at the following link:

http://www.darlington.gov.uk/dar_public/documents/_Place/PolicyRegeneration/PlanningPolicy/MGP/MGP_main.pdf

Summary

3. As part of the preparation of the Local Plan, consultations were carried out on the MGPPPO from 21 June to 9 August 2013. About 350 written responses were received, together with the comments made by the 600 people who attended the public events and meetings. The consultation was widely publicised, and responses were received from members of the public, local interest groups, landowner/developer interests and statutory consultees, among others.
4. The responses covered a variety of planning (and non-planning) issues, although the majority were objections to proposed housing allocations. A summary list of all the responses and officer comments, is available at www.darlington.gov.uk/MGP
5. Specific actions are proposed to take forward the development of policies for the Local Plan, taking into account the responses to consultations. Additional studies that have been or are being completed since the Preferred Options were drafted also need to be taken into account, along with consideration of any changed circumstances. Because this may well result in policies that are quite different from the draft policies presented in the Preferred Options document, further consultations will need to be programmed prior to finalising the plan for Publication.

Recommendation

6. It is recommended that :-
 - (a) Members note the consultation representations received and related officer comments;
 - (b) Members consider the key actions and next steps indicated in the report.

Richard Alty, Director of Place

Background Papers

Making and Growing Places Preferred Options Development Plan Document 2013.

Steve Petch : Extension 2627

S17 Crime and Disorder	The Local Plan has a role in reducing crime through the design and location of development.
Health and Well Being	A key objective of the Local Plan policies is to improve peoples health and well being by protecting and improving the economic, social and environmental conditions in the Borough.,
Carbon Impact	A Sustainability Appraisal was carried out on the MGPPPO. Achieving sustainable development is a fundamental objective of the Local Plan.
Diversity	An Equalities Impact Assessment was carried out on the MGPPPO
Wards Affected	All
Groups Affected	All
Budget and Policy Framework	Work on the Local Plan is being carried out within the budget allocated to the service.
Key Decision	No
Urgent Decision	No
One Darlington: Perfectly Placed	The Local Plan reflects the spatial implications of the overarching aims of One Darlington: Perfectly Placed.

MAIN REPORT

Information and Analysis

7. Making and Growing Places: Preferred Options (MGPPPO) is a draft Local Plan document which aims to:-
 - (a) Translate national planning policy into local planning guidance;
 - (b) Translate the Councils' strategic Core Strategy policies into more detailed policies for developers and local people; and
 - (c) Adopt a positive approach to considering development proposals to deliver sustainable development, particularly those that improve economic, social and environmental conditions.
8. To achieve these aims the document:-
 - (a) Sets out proposals for where new housing, businesses, shops, schools, sports facilities, roads and open space will be located in the Borough to 2026;
 - (b) Sets out which land, such as parks and playing fields, will be protected from development; and
 - (c) Identifies the different issues the Council will consider in the future when assessing planning applications.
9. Once adopted, Making and Growing Places will replace the existing Local Plan, and will be used with the already adopted Core Strategy to assess all planning applications.

Community and Stakeholder Consultation

10. At the Cabinet Meeting on 4 June 2013, it was agreed that the MGPPO be the basis for carrying out public and other consultations.
11. In accordance with the Council's Statement of Community Involvement and to meet regulatory requirements regarding public participation in the preparation of a development plan document, consultations were carried out on the MGPPO between 21 June and 9 August 2013.

What we did:

12. The programme of events and activities involving the public and other interested groups included:-
 - (a) A Members' briefing prior to the start of consultations;
 - (b) A Special Place Scrutiny Committee to which all Members were invited;
 - (c) 15 drop-in sessions at venues across the Borough including locations close to proposed housing sites;
 - (d) An information stall/drop-in session at the outdoor market;
 - (e) Specific stakeholder events, such as a housebuilder/developer meeting, attending the BID Board and a Business Breakfast event, and attending community partnership meetings at Central and Cockerton; and
 - (f) Children and young people engagement work with Harrowgate Hill, West Park and Red Hall primary schools.
13. Items about the consultation and the planning issues covered in it were carried in The Northern Echo and Darlington & Stockton Times, before, during and immediately after the consultation period closed, and in the June and July editions of Darlington Together. The consultation was also advertised in the Council's business engagement e-newsletter 'Interface' and in some Councillors' newsletters. The documents and comments forms were available at all the events and at the libraries and Town Hall.
14. Over 7000 individual letters were sent to neighbours of the proposed housing sites. In addition, over 1000 statutory bodies, interested organisations, agencies and residents who previously commented on the Local Plan, were contacted by letter or e-mail to notify them about the consultation, and to provide them with information about the MGPPO, and accompanying Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA) and Equalities Impact Assessment (EQIA). Published information included the document itself, a summary leaflet and a set of factsheets. All the documents, and the opportunity to reply to the consultation on-line, were available on a dedicated page about the Local Plan on the Council's website, or through Twitter and Facebook.

Who got involved?

15. Around 350 e-mail/written responses were received and over 600 people attended drop-in events (some more well attended than others). The majority of responses (including several 100 plus name petitions and collections of standard letters) are from local residents concerned about potential housing sites close to their homes. The remaining responses from non-residents include those from local bodies and agencies, national/local pressure

groups; landowners/planning consultants seeking to promote inclusion of particular sites in the Plan, and the rest from other local authorities and Parish Councils. Various Ward and Parish Councillors attended drop-in sessions and some were involved in directly providing information to their constituents.

16. Several editorial pieces were reported in the Northern Echo and a reporter attended a drop-in session at Mount Pleasant School. Only a few responses came through Facebook or Twitter.
17. As this report shows, this type of consultation tends to generate a variety of concerns and objections to the Council's proposed approach and suggested policies. Nevertheless there have been some expressions of support, for example for the approach to flood risk within the TCF policy from the Environment Agency, for the approach to green infrastructure from the Tees Valley Local Nature Partnership, the Woodland Trust and Natural England, for the heritage policy from the Darlington Lib Dems, and for co-operative working with the Highways Agency, and with Stockton over DTVA policy.

Process

18. Although in general the consultation process was well received and generated a lot of interest, a few complaints were received about the process. Some people felt there was not enough publicity generally, whilst others, living close to proposed housing sites, complained they had not received individual letters. Despite every effort to make the consultation process as inclusive and accessible as possible, it is acknowledged that some will not have been informed directly. Usefully, through word of mouth and, on occasion, through local people and ward Members giving out event details, more people were informed.
19. Some respondents felt there were not enough officers at the events and others were unhappy that the events themselves were drop-in sessions rather than more traditional public meetings. Given the number of events and the limited staff resources, and despite trying to anticipate where the largest attendances were likely to be, at times officer capacity was stretched. Nevertheless compared with the numbers attending, the levels of complaint were few, and most people appreciated the time and effort that had been put in. Drop-in sessions were used rather than traditional public meetings as the former give more opportunity for interaction, discussion and practical 'planning for real' exercises. They also allow people to attend at any time within the two hour session, and not be tied to a start and finish time.
20. Complaints were also made about the length of the MGPPO document itself. The length of the document is determined by the Stage the local Plan has reached. By its nature, the Preferred Options document needs to include not only context and evidence for each policy area, but has to set out the various options considered prior to choosing the preferred policy approach. To try to address the issue of length, a series of summary Factsheets were produced and made available as part of the consultation. The next version of the document will be much more succinct.

Consultation Responses on Specific Issues

Housing Numbers

21. The MGPPO includes a housing requirement figure of about 5800 dwellings to cover the period to 2026. On the one hand, residents, objecting to proposed new sites, have asked why so much new housing is needed, citing vacancies in the existing stock, problems people are having selling homes, and the general poor state of the housing market, as evidence. On the other hand, developers and those promoting new housing sites suggest

that the plan is not providing for enough new housing and that the evidence base, and therefore the plan, is unsound. For example the House Builders Federation (HBF) argue that if more up to date data is used, there would be a requirement for 533 dwellings per annum and not the 350/400 planned for in the document, whilst others have argued that there should be a 10-20% buffer on top of the actual requirement, to ensure delivery. In addition the HBF feel the Council should be planning for 20%+ more houses to be delivered in the first 5 years, rather than just 5% extra.

22. Developers also think the plan is over optimistic about housing delivery, feasibility and viability on some sites, (e.g. Central Park, Town Centre Fringe, and the former DFC Ground at Feethams), and is too reliant for housing supply on a few large and complex sites.

Officer Comments and Key Actions

23. The draft housing allocations published and consulted on was considered to be the minimum required to meet the housing growth identified in the Core Strategy. It is apparent from consultation responses and changes to the national policy position that consideration will need to be given to the allocation of further sites to meet the housing needs of the Borough. As it stands, the draft housing allocations do not provide the Council with any flexibility, if any of the arguments advanced by others for higher housing numbers find favour with the Local Plan inspector at Public Examination in due course, or if any of the sites identified do not come forward for new housing at all, or as quickly as envisaged.
24. Further work is being carried out to present options to the Council as to how it might plan for housing needs if these scenarios arise.

Housing Sites

25. Not unexpectedly, there has been strong local opposition to development on most of the proposed allocated housing sites. Although the reasons vary in detail between sites, there are common threads around the potential impact on local traffic, access difficulties, impact on the local amenity of adjacent properties, impact on biodiversity levels, likely flooding issues, loss of recreational open space, and loss of views and impact on property values (although the latter two are not planning reasons). Local residents also generally support the use of brownfield land for new housing before using green fields.
26. The HBF argue that the lack of sites outside the urban area does not meet development need and demand and will exacerbate affordable housing issues in other settlements.
27. As well as getting views on the proposed new housing sites, the consultation process is also an opportunity for interested parties (developers, agents, landowners etc) to bring forward other potential sites for consideration. Several further housing sites have been proposed, ranging in size from 3 to 800 units and are capable of delivering about 3,500 new homes in total. The sites include:-

(a) Within urban area (total potential capacity = 740+)

- (i) St Modwen land west of the Bishop Line at Faverdale (c.485 new homes + 37,500sqft B1(c), B2 and B8 employment floorspace)
- (ii) Hansteen and Argon land at Faverdale Industrial Estate, both as part of mixed use allocation (no numbers given)
- (iii) Ward Bros, Albert Hill (c.120 dwellings) but not in first 5 years

- (iv) Polam Hall school – (about 40 units)
 - (v) Yarm at Ravensthorpe (about 20 units)
 - (vi) Land at Haughton Road (c. 50 dwellings, including Ha11)
 - (vii) Former Arts Centre (c. 50 dwellings)
- (b) Urban fringe (total potential capacity = up to c.1900)**
- (i) Berrymead Farm, Harrowgate Hill (c.800 new homes, including 80 on Ha2)
 - (ii) Land south of Burtree Lane/east of Whessoe Road (c.170 dwellings)
 - (iii) East of Durham Road, Harrowgate Hill (2/3 landowners – could be c. 200+ dwellings, including Ha16)
 - (iv) South of Staindrop Road (300-500 houses)
 - (v) North of Coniscliffe Road (240-330 houses)
 - (vi) Small sites at Burtree Lane and Coniscliffe Road
- (c) Edge of Larger Villages (total potential capacity = 500+)**
- (i) Land north of Hurworth (up to 50 dwellings)
 - (ii) Beech Crescent, Heighington (c.50)
 - (iii) East of Middleton lane, Middleton St George (80 dwellings)
 - (iv) North of former trackbed, Middleton St George (250 houses)
 - (v) South of Neasham Road, Middleton St George (c30-40 houses)
 - (vi) Land west of Walworth Road, Heighington (c60-70)
- (d) Other Villages (total potential capacity = c.70)**
- (i) Former Sadberge Reservoir (c.50 dwellings)
 - (ii) Land west of Mill Lane, High Coniscliffe (up to 3 dwellings)
 - (iii) Land west of Great Stainton (exec or general)
 - (iv) Neasham nurseries (12 exec houses)
- (e) Other (total potential capacity = 400+)**
- (i) Land at DTVA (specific site) (elderly persons housing)
 - (ii) Wider DTVA area (around 400 houses)

Officer Comments and Key Actions

28. Since the consultation was carried out, planning applications have been submitted on sites (p) and (q) above, and will be determined by Planning Committee in due course. A public consultation by Peel Ltd is also underway on a draft masterplan for Durham Tees Valley Airport, including provision for 250-400 new homes as part of 'enabling development' to secure the long term viability of a regional airport with a direct passenger link to a European hub. The Council will be responding to that consultation separately.
29. All the planning issues raised by people about proposed sites during the consultation are being considered alongside the comments made by landowners and developers within interests in those and other sites. Where necessary, the existing site assessment information will be updated, and comparable assessments carried out on new sites proposed. In addition to comments received the annual Strategic Housing Land Availability Assessment (SHLAA) is currently being updated and will help to inform the site allocations. A revised portfolio of potential housing allocations will then need to be agreed, and consultations carried out on any new sites not originally identified.

Executive Housing

30. Four sites are identified at the former Blackwell Grange Golf Club for executive housing totalling about 50 dwellings. There has been significant local opposition to any housing development with support for retaining and enhancing the parkland setting and protecting the wildlife. Blackwell residents responses range from disagreeing with the results of the initial site assessment for top-end executive housing to suggesting alternative locations for development on the former golf course. It is also suggested that surface water flooding may be a development constraint. English Heritage is concerned about how low density housing would fit into the historic environment. Others however felt some housing may be appropriate and various respondents, who back onto site He4, have shown an interest in potentially extending their gardens as part of any planned scheme.
31. A couple of developers/landowners argue that the number of top-end executive homes required has been seriously underestimated. They suggest the number should be increased from about 50 to 200 dwellings. Blackwell residents, on the other hand, argue that the number is overestimated and previous attempts to restrict sites to executive housing have failed, resulting in non-executive housing being permitted.

Officer Comments and Key Actions

32. As a result of new information and the comments received, officers are undertaking a reassessment of the proposed sites. As for the surface water flooding, this could be addressed by diverting the water to existing or new ponds on the undeveloped part of the former golf course. However, that would only happen if He3 is developed. As for the number of top-end executive homes, the proposed policy includes flexibility to introduce new sites if completions exceed three dwellings per year for three consecutive years.

Housing Related Matters

33. In addition to the issues raised about housing numbers and sites, the housing policies generated a variety of other related responses, issues and questions:-
 - (a) **Type of housing:** it is suggested the Plan should have more on elderly people's accommodation, and the HCA asks the Council to reconsider the affordable housing definition to include affordable rent (homes let at more than social rent but less than market rent) within the definition.

- (b) **Development Limits:** there have been a number of challenges to the approach used to determine development limit boundaries. Many of these have been made in conjunction with proposals for new development sites on the edge of settlements (see list above), whilst others relate to possible consistency issues.
- (c) **Development Standards/developer contributions:** objections have been raised to the proposed Code for Sustainable Homes standard and levels of other planning obligations, suggesting that this will make development in Darlington unviable. In addition, the HBF query the approach to collecting contributions for open space.
- (d) **Housing intensification:** one respondent suggests that there may be a need to consider further areas for this policy (which seeks to limit houses in multiple occupation in areas with existing high concentrations of such properties), depending on the potential displacement effect of implementing it in this initial area.
- (e) **Social infrastructure:** several residents near proposed housing sites in Harrowgate Hill (including Whessoe Parish Council), Bellburn Lane and the North West Urban Fringe object to the proposed development because of the inability of local schools and health facilities to cope with the extra demand

Officer Comments and Key Actions

- 34. Officers are preparing a joint housing and planning position statement on older person's accommodation needs which will inform the Local Plan. The definition of affordable housing will be updated, to reflect the NPPF definition.
- 35. The proposed Code for Sustainable Homes standards in the Plan, are in line with current adopted national guidance. However, during the consultation for the MGPPPO the government consulted on a range of proposed changes to the national sustainability standards. It is expected that Policy MGP33 (Sustainable Design and Adaptation to Climate Change) will have to be revised to reflect the anticipated change in Government approach.
- 36. The levels of planning obligations proposed, and the approach to open space contributions are consistent with the adopted Planning Obligations SPD and are currently applied through the development management process. However, a viability assessment will be undertaken for the whole plan before Publication stage to ensure that all sites can be delivered with the necessary infrastructure and planning obligation requirements.

Town Centre Fringe (TCF)

- 37. There is general support for the TCF proposals from residents around the Borough who commented on it. Also, there is no strong opposition from local residents to new housing in this area. Their concerns are more focussed on what housing regeneration will mean for existing houses in the area, and what type of housing could be expected. Site specific issues raised by respondents include those from Royal Mail who have specifically indicated that they want to continue mail services from their site on St. Cuthberts Way, reversing previous indications that they would be willing to talk about alternative uses. Elsewhere within the TCF, developers have suggested land at Garden Street should be allocated for mixed uses, whilst consultants propose that the TCF policy should recognise the potential of the area to accommodate large scale comparison retail.
- 38. Despite the general support for the TCF concept and ambitions, for example, the Environment Agency supports the proposals from a flood risk/management perspective, questions have been asked about its viability and deliverability. Several developers argue that the area based approach to housing numbers is unsound and that anticipated levels of

housing development within the plan timescales are unachievable. Furthermore, the Homes and Communities Agency have asked for all references to funding from it (£20million towards TCF) to be removed, as this is no longer a firm commitment.

Officer Comments and Key Actions

39. The Council acknowledges that with the withdrawal of £20m of HCA funding, there are significant issues around the delivery and viability of the Council's aspirations for the Town Centre Fringe in the short to medium term. Therefore, although the TCF Masterplan remains a key regeneration aspiration of the Council, and will remain so in the Local Plan, it is acknowledged that the scale and timing of development may need to be revised backwards. This will mean that more land for new housing will need to be found elsewhere in the Borough, and earlier than anticipated. The sites will be identified as per the site assessment process mentioned in paragraph 29 above.

North West Urban Fringe (NWUF)

40. Proposals for a large scale extension to the West Park development has generated significant public opposition, focussed on the potential impact on neighbouring properties (views, amenities, values), anticipated increases in traffic, worsening flooding and drainage problems, impact on schools, doctors and other community facilities, and the likely impact on nature conservation. Some residents of the neighbouring West Park development were concerned about the amount of affordable housing that would be included, and the impact of more new housing on the already congested West Auckland Road
41. Not all respondents were totally against further development, as people recognised the need to house future generations, and would welcome more housing where this would help deliver new community infrastructure, such as a doctor's surgery. As such there have been suggested alternative design responses including the retention of significant green lungs, particularly in the area north of Jedburgh Drive.

Officer Comments and Key Actions

42. As a strategic location in the adopted Local Plan, the NWUF will remain in the local plan as a location for large scale housing and associated community facilities, with a target for 30% affordable housing. Nevertheless, officers welcome the design ideas put forward during the consultation and will work with local residents and landowners on developing the masterplan for the area in due course.

Eastern Urban Fringe (EUF)

43. The EUF is also a strategic location for major housing development in the adopted Core Strategy planned to come on stream towards the end of the Local Plan period (2021 – 2026). The initial 250 dwellings would be increased significantly beyond the plan period. The consultation generated public opposition to new housing, particularly in northern part of site from residents of Haughton and Great Burdon. Objections relate to increased risk of flooding and traffic impact, as well as the loss of rural outlook.
44. Promoters of the site (Burdon Hill) have argued for significantly more houses (up to 1500 homes) to start earlier in the plan period (ie 2015 onwards), and have submitted an vision statement to illustrate their response.

Officer Comments and Key Actions

45. As with the NWUF, a masterplan of the EUF area would be a precursor to any development proposal and the issues raised by objectors would be important

considerations informing that plan. Again, housing numbers and the site boundary are being reviewed in light of all the responses received and changing circumstances since the Preferred Options was drafted. This review will include revisiting the assumptions used in relation to the scale and timing of housing within the EUF.

46. Detailed discussions are also taking place with the developers of the EUF to ensure that this location will provide enough housing of the right type and tenure to meet local needs at the right time, with sufficient supporting infrastructure to meet the needs of the development. This will also be informed by various assessments the developers have commissioned e.g Flood Risk Assessment and Transport Assessment.

Red Hall

47. Consultation events held at Red Hall took the form of Planning for Real exercises which combined Local Plan issues (including the relationship with surrounding proposals at the EUF and Lingfield Point) with more specific ideas around regenerating the existing housing estate. The events were well attended by local residents and people from the nearby communities of Haughton and Great Burdon. There was a general acceptance and welcome from local people about the need to refurbish the estate with the possibility of some new housing in places and potential small scale demolition in others. Respondents expressed a need for new affordable housing, better public transport to supermarkets community services, and more shops and facilities on the estate itself. Most local residents want overall open space to be improved to better meet needs of children, young people and older people in the area. There was also some support for the former Stables area to be developed for new housing, although not at the expense of all the open space. In particular there were strong views that the playing pitch next to Community Centre should be kept.

Officer Comments and Key Actions

48. Officers are assessing the wider infrastructure needs of the eastern area (Red Hall and EUF) to ensure that the existing and proposed infrastructure in the area has the capacity to accommodate the level of new development proposed overall. The results of this, along with information provided by the developers of the EUF and the responses made by the residents of Red Hall will inform the preparation of the Red Hall Masterplan.

Durham Tees Valley Airport (DTVA)

49. DTVA Ltd argue that the relevant MGPPPO policy should reflect the masterplan being prepared at the time of the consultation (now complete and out for consultation itself), and for it to state that it will guide the determination of planning applications. The company also challenges the MGPPPO evidence base (Business Sites and Premises Review and Sustainability Appraisal) and process, for example how alternative options were generated and whether they are the most appropriate ones. They also propose significant changes to the draft Policy to make it more flexible and permissive.
50. A representation has also been received from the owner of land at the northern edge of DTVA area, who wants the site allocated for elderly persons' accommodation.

Officer Comments and Key Actions

51. As stated, the masterplan, (incorporating a business plan and spatial plan) for the future of the airport is currently being consulted on by DTVA Ltd. The Council will have a key role in responding to and negotiating the final contents of that plan, which currently includes significant housing development (up to 400 dwellings). If approved, the Council will need to consider either including the masterplan proposals in the Local Plan, or continuing to

regard the proposals as exceptions to the Local Plan. In any case, given the urgency of the need to address the viability issues at the airport, it is likely that a planning application will have been received and determined by the Council prior to the next version of the draft Plan being published.

Town Centre/Retail

52. The Local Plan seeks to protect the viability and vibrancy of the town centre both to enhance its role as an economic asset for the town and to improve its offer across a range of retail, leisure, commercial and service facilities. As such there has been some support for the Feethams leisure proposal. Other respondents have posed questions around how the Local Plan policies will achieve their aims against the changing role of town centres, a case in point being the restrictive frontage policies.
53. A common concern is that more needs to be done to provide convenient car parking for shoppers, and, more specifically, that the proposed extension of the town centre/multi-storey car parking beyond the ring road in the Kendrew Street area is not needed, particularly given the competition to the Oval Scheme from the Northern Echo offices proposal. The need for a bus station in the town was raised with sites such as Commercial Street car park a popular suggested location.

Officer Comments and Key Actions

54. Officers acknowledge the changing role of town centres will have implications for Darlington, for example the increasing amount of online shopping, and the need to broaden the offer for visitors and residents alike. To understand the changing trends more directly for Darlington and to get a better understanding of the challenges and potential opportunities going forward, a Retail Study has been commissioned which will report in the spring. The Study will consider the responses received during the Local Plan consultation and may recommend changes to the approach.

Employment Land

55. There have been several challenges to the apparent over-provision of employment land in the MGPPPO, and consequently suggestions that some sites, which have proved difficult to market for employment use in recent years, should be allocated for other uses. For example, land at Faverdale Industrial Estate (Hansteeen Holdings) for other uses, land south of Cummins for an extension to Maidendale nature reserve, land at DTVA for housing and employment, and St. Modwen land to the east of the Bishop Line at Faverdale for predominantly housing. Owners of land at Albert Hill indicate there is no prospect of employment on their land either.

Officer Comments and Key Actions

56. Officers consideration of some of these sites is being brought forward through other planning channels, in that St Modwen are likely to submit a planning application for 600 houses in the near future, and DTVA are progressing a masterplanning exercise through public consultation. The outcome of these will have a significant bearing on the emerging Local Plan and particularly on the housing allocations policy.
57. Officers are continuing to work with the Friends Group at Maidendale Nature Reserve, to agree a way forward in terms of the extension of the Nature Reserve balanced against the need to provide a range and choice of employment sites in appropriate locations. Further work is being undertaken by consultants on a Logistics Study to allow officers to understand how some of the boroughs sites could attract such uses. Officers will be considering the evidence put forward regarding individual sites, however in the majority of

the cases cited, the sites have been considered suitable for employment uses by the BSPR work, taking into account the need to meet employment needs throughout the plan period and not just on a short term basis.

Gypsy and Traveller Accommodation

58. Consultation on potential sites to accommodate Gypsies and Travellers was undertaken in 2012. As a result Cabinet resolved to allocate the majority of additional pitches as extensions to existing sites at Neasham Road and Honeypot Lane. Although, the MGPPPO was not, therefore consulting on a range of potential sites, it did provide an opportunity for additional sites to be suggested. Two such areas of search are pitches proposed at Snipe Lane and an extension of 4-6 pitches proposed at Aycliffe Lane, Brafferton. The HCA (which provides funding for new pitches) has suggested the Council look at sub-options for preferred sites to ensure future demand and sustainability.
59. The number of new pitches required, identified in the MGPPPO, is based on a combination of the findings of the Tees Valley Gypsy and Traveller Accommodation Assessment (TVGTAA) (2009) and recent local experience and knowledge. The other Tees Valley local authorities are challenging the evidence basis for our pitch target and suggesting it should be amended to reflect the TVGTAA (i.e. be much higher).
60. Issues around planning for Gypsies and Travellers remain contentious. The Council continues to receive a steady stream of planning applications for additional pitches on unallocated private sites such as Snipe Lane, Hurworth Moor and at Brafferton. Those refused planning permission are usually subject to the planning appeal process and determined by an independent planning inspector.

Officer Comments and Key Actions

61. Given the emphasis on assessing needs locally, by the recent government policy document Planning Policy for Traveller Sites (CLG March 2012), and the time that has lapsed since the original Tees Valley Study, officers feel there is a need for an updated study for Darlington. Consultants will be commissioned to undertake a new Gypsy and Traveller Accommodation Needs assessment, using up to date information and evidence. This will involve primary research by an independent team and will allow the needs of Gypsies and Travellers to be better understood. The study will also take into account local evidence such as planning applications, take-up rates and local trends. The results of the study will inform the local plan and planning application decision making.

Playing Fields and Open Space

62. **Playing fields:** where there are proposals to build on these, e.g. Eastbourne School, Glebe Road, residents are questioning whether the requirement for pitches to be provided in other parts of town, that will cost more to use and to travel to, are equivalent alternative provision. Also, if these playing fields are to be re-located residents argue that the existing space could be kept and re-used as open space (rather than formal pitches), as in most areas where there are proposals to build, residents consider there is a lack of informal recreation space. On a point of principle, respondents ask why Springfield Park is not also being proposed for development, if the 'hub approach' is being applied consistently.
63. **Open Space:** where there are proposals to build on these within the urban area, e.g. Bellburn Lane, Glebe Road, residents are questioning whether the Council is applying the same open space standards to existing urban area as to the proposed urban extensions and other new development.

64. **Cemetery extension:** Residents next to the proposed West Cemetery extension have asked detailed questions about impact on privacy, proposed boundary treatment and drainage/flooding implications.

Officer Comments and Key Actions

65. The 2009 Playing Pitch and Sport and Recreation Facilities Strategies have been used to inform the MGPPPO. These are currently being revised in line with new Sport England guidance on playing pitch provision. This work is expected to take 9 – 12 months. As a result, the detail of this policy may change. Only those single playing pitches that are unable to accommodate programmed matches were considered for development as they are not performing their intended function. Springfield Park is not a single pitch site and is used for programmed matches and training by local teams so is required to continue to perform that function in that location.
66. A Green Infrastructure Topic Paper is also being prepared to set out the approach taken to open space standards in the Borough – this includes the amount of open space to be provided by proposed allocations. The standards set out in the draft policy MGP24 are expected to change slightly to reflect any changes to housing and employment sites (loss of open space and/or gains through several larger urban fringe sites coming forward.)

Transport Policies

67. **Delivering a More Sustainable Transport Network** - this policy is intended to replace and update Policy CS19 of the Core Strategy. Most comments received in relation to this policy are expressing concern at existing levels of congestion experienced on the road network with a number of potential solutions also suggested. The policy also looks beyond road transport to try and build on the work of the Council's Sustainable Transport team to encourage people to use more sustainable methods of travel to reduce demand on the road network. The Council continues to work closely with Tess Valley Unlimited (LEP) and the Highways Agency to identify measures to maintain and where possible improve traffic flow in the borough. As work is ongoing with these partners and also heavily linked with proposals for housing and employment growth discussed elsewhere in the plan the demands on the transport network will alter accordingly. As we progress toward a final portfolio of sites this will then enable more detailed consideration of any highway mitigation measures required. Should any proposals require land to be safeguarded for transport schemes it is hoped this could be reflected in the next stage of the plan. Other issues raised included the lack of provision of a bus station and park and ride facilities.

Development Management Policies

68. There are a group of policies that will be used in the Development Management process to be used in conjunction with other local and national policy and guidance as material considerations in determining planning applications. The range of subjects covered by these policies vary and include development in rural areas, heritage, sustainable drainage, supporting community and social infrastructure, airport safety etc. These policies aim to support and supplement but not duplicate existing national and local policy.
69. **Economic Development in the Open Countryside** - encourages support for rural enterprise particularly where provision is accommodated within existing redundant buildings. Since drafting this policy a temporary (3 year) relaxation of the planning regulations from May 2013 allows land owners to convert barns and farm buildings, and any land within the curtilage, to retail, employment and community uses. Additional work is required to review this policy and ensure compliance with national policy. As this is only a temporary relaxation and the plan period is for a far greater time it may be a policy is needed to guide development beyond this period.

70. **Residential Uses in the Open Countryside** - drafted as quite a restrictive policy as new residential development in the open countryside is generally not considered to be the most sustainable. Comments were received during consultation that this policy is overly restrictive and particularly the requirement to demonstrate that dwellings have an identified agricultural need. There is also a proposal in the draft policy for replacement dwellings which do not generate many concerns but needs further clarification to avoid 'isolated dwellings' which are not supported by the NPPF. Since the consultation on the MGPP0, the government has published a consultation document entitled 'Greater Flexibilities for Change of Use'. This document proposes similar relaxations for conversion of buildings to residential use as had been made for commercial ventures. The results of the consultation are not yet available but the Government hopes to introduce changes from April 2014.
71. With so many changes in rural planning matters since drafting the MGPP0 it is acknowledged that the relevant policies will need reviewing. It is not yet known what the implications will be for residential uses however a policy framework will be needed to supplement the NPPF for the duration of the plan period, not just to reflect any period of 'temporary relaxation' of regulations.
72. **Protecting Darlington's Heritage Assets** - an all encompassing policy for a range of heritage matters. At the heart of this policy is the change in emphasis in the NPPF to protecting the significance of heritage assets. Comments were received that the policy needs to do more to identify strategic outcomes for Darlington's heritage. It was also noted that industrial heritage has not been considered and to be consistent with Core Strategy CS14 this will be introduced in future. A greater emphasis on enabling development being a last resort was also suggested. Further work will be undertaken to clarify the intended strategic outcomes of this policy but otherwise will retain a similar structure and content.
73. **Supporting the Delivery of Community and Social Infrastructure** - the main concern raised with this policy is the proposed safeguarding of a site on Yarm Road, Middleton St. George for a doctors surgery. Local residents are primarily concerned with the access arrangements and additional vehicle movements and parking requirements such a facility would bring. These matters would require further consideration on submission of a planning application and residents would be consulted on such a proposal. The site is located outside the identified development limits and its proposed allocation in the plan was to help facilitate delivery of new GP surgery facilities, if and when such facilities are approved by the relevant health organisations.
74. **Sustainable Drainage Systems (SUDS)** - the Government are expected to introduce measures for SUDS in new development over the next year. Depending on the outcome or timing of this more flexibility may need to be built into this policy.

Duty to Co-operate

75. As part of the Local Plan preparation process, the Council has a duty to co-operate with adjacent local authorities and statutory bodies. Responses on this element of the consultation have varied. The HBF say there is not enough evidence of co-operation. It is looking for implemented actions and high level agreements between local authorities to tackle strategic issues. More specifically, evidence of joint working on housing need, and material actions and agreements needed to deal with the shortfall.
76. Of the National Agencies that responded crucially, the Environment Agency is supportive of the Town Centre Fringe policy from a flood risk perspective, but across the plan as a whole wants more references to water framework directive objectives, issues and improvement priorities. Natural England is generally supportive of the plan policies. English Heritage

have made detailed comments, and HCA suggest the affordable housing definition needs updating, and that G&T responses need to be fully considered.

77. There has been some co-operation but not agreement with other Tees Valley authorities on Gypsy and Traveller accommodation. Whilst no significant issues have been raised by other neighbouring authorities. There has been limited written feedback from Parish Councils namely Hurworth, Whessoe and Middleton St George.

Equality Impact Assessment

78. Darlington Association on Disability responded to request that consideration should be given to including a short section in the document on the approach to dealing with disability issues allied to a separate policy rather than it being incorporated within MGP28. Further work to be undertaken to establish if this is the most appropriate way to address this matter. It is acknowledged that accessibility for all is a cross cutting issue so it may be more appropriate to have a concise section to deal with accessibility.

Next Steps

79. Subject to the Committee's comments, the proposed key actions will be undertaken to advance the preparation of the Local Plan. Officers will also consider the findings of studies currently underway or programmed including the Darlington Retail Study, the Strategic Housing Land Availability Assessment (SHLAA), the Logistics Study, and the Darlington Gypsy and Traveller Accommodation Assessment.