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Council Agenda

DARLINGTON
BOROUGH COUNCIL

6.00 pm Thursday, 20 February 2020
Council Chamber, Town Hall,
Darlington. DL1 5QT

Members of the Public are welcome to attend this Meeting.

1. Introductions / Attendance at Meeting.

2. Declarations of Interest.

3. Announcements.

4. Questions - To answer questions where appropriate notice has been given from Members of the Public

5. Medium Term Financial Plan –
   Report of the Chief Officers Executive
   (Pages 1 - 62)

6. Darlington Capital Strategy –
   Report of the Chief Officers Executive
   (Pages 63 - 82)

7. Housing Revenue Account - MTFP 2020/21 to 2023/24 –
   Report of the Director of Economic Growth and Neighbourhood Services
   (Pages 83 - 98)

8. Prudential Indicators and Treasury Management Strategy Report 2020/21 –
   Report of the Managing Director
   (Pages 99 - 136)

9. Setting the Council Tax for 2020/21 –
   Report of the Managing Director
   (Pages 137 - 146)

10. Pay Policy Statement 2020/2021 –

Report of the Managing Director
(Pages 147 - 156)

11. Borough of Darlington Proposed Submission Local Plan 2016-2036 – Report of the Director of Economic Growth and Neighbourhood Services
(Pages 157 - 768)

DISPENSATION - SECTION 33 OF THE LOCALISM ACT 2011

Luke Swinhoe
Assistant Director Law and Governance

Wednesday, 12 February 2020

Town Hall
Darlington.

Membership
The Mayor, Councillors Ali, Allen, Baldwin, Bartch, Bell, Boddy, Dr. Chou, Clarke, Cossins, Crudass, Crumbie, Mrs Culley, Curry, Donoghue, Dulston, Durham, Harker, Haszeldine, Heslop, Holroyd, Howarth, Howell, C L B Hughes, L Hughes, Johnson, B Jones, Mrs D Jones, Keir, Laing, Layton, Lee, Lister, Lucas, Marshall, McCollom, McEwan, Mills, Newall, K Nicholson, M Nicholson, Paley, Preston, Renton, A J Scott, Mrs H Scott, Snedker, Tait, Tostevin and Wright

If you need this information in a different language or format or you have any other queries on this agenda please contact Paul Dalton, Elections Officer, Resources Group, during normal office hours 8.30 a.m. to 4.45 p.m. Mondays to Thursdays and 8.30 a.m. to 4.15 p.m. Fridays Email: paul.dalton@darlington.gov.uk or Telephone 01325 405805

SPECIAL COUNCIL
20 FEBRUARY 2020

MEDIUM TERM FINANCIAL PLAN

Responsible Cabinet Member - Councillor Heather Scott
Leader and all Cabinet Members

Responsible Director – Chief Officers Executive

SUMMARY REPORT

Purpose of the Report

1. To approve a Medium Term Financial Plan (MTFP) for 2020/21 to 2023/24 including setting a budget and council tax increase for 2020/21.

Summary

2. The Council has faced significant challenges over the last decade following the economic downturn and reduction in public sector spending. To date, the Council has been successful in responding to these challenges but there are still financial pressures to be faced, particularly in respect of a growing elderly population and pressure in the children's social care sector. We therefore must continue to be creative and innovative in ways of working and press ahead with every effort in our priority of growing the economy.

3. The Council received its definitive financial settlement on 6 February 2020 with no change from the draft released in December. The settlement was in line with the Chancellors spending review announcement with the continuation of Revenue Support Grant (RSG), New Homes Bonus (NHB); additional social care monies of £2m and the ability to raise income for Adult Social Care through the precept. The settlement was for one year only so assumptions in regard to future years funding have been made.

4. There have been a limited number of amendments to the draft MTFP proposed for consultation and all are noted in the table in paragraph 16. The main changes are in regard to the National Living Wage increases, impact of Quarter 3 budget management and the receipt of the settlement figures.

5. The Council undertook a significant consultation exercise in 2016 following an in-depth and detailed review of all services which resulted in the agreement of a Core Offer budget which allowed for a small futures fund allocated to discretionary services. Furthermore, in subsequent MTFP's Members following consultation agreed to use unallocated balances of £4.7m to invest in five areas which hold great value to our community, they were;

   (a) Community Safety
   (b) Maintain an attractive street scene environment

(c) Maintaining a vibrant town centre
(d) Developing an attractive visitor economy
(e) Neighbourhood renewal

6. The Core offer remains challenging with some significant pressures arising in Children's social care. Nevertheless, through innovative financial investments, increased income from economic growth successes and a positive pension triennial review, the Council can still deliver the agreed balanced plan, finance the MTFP a further year to 2023/24, and allocate an additional £1.8m to bolster the Futures Fund themes whilst retaining usable balances of £3.683m.

7. In summary, the Council's financial position is robust with a four-year balanced MTFP and funds available for investment which will be delegated to Cabinet.

Recommendation

8. Council are requested to:

(a) Approve the Revenue MTFP as set out in **Appendix 7** including the following;

(i) Council tax increase of 1.99% plus the 2% adult social care precept to fund social care for 2020/21 totalling 3.99%.

(ii) Schedule of charges as set out in **Appendix 3**.

(iii) The Futures Fund investment of £1.8m as set out in paragraph 62.

(b) Approve a delegation for Cabinet to vary the Revenue Budget for 2020/21 by up to £0.5m without further Council approval.

Reasons

9. The recommendations are supported by the following reasons :-

(a) The Council must set a budget for the next financial year.

(b) To enable the Council to continue to plan services and finances over the medium term.

(c) To ensure decisions can be made in a timely manner.

Chief Officers Executive

Background Papers

No background papers were used in the preparation of this report.

Elizabeth Davison: Extension 5830

S17 Crime and Disorder	The report contains proposals to continue to allocate resources in support of the Council's Crime and Disorder responsibilities
Health and Well Being	The report contains proposals to continue to allocate resources in support of the Council's Health and Well Being responsibilities
Carbon Impact and Climate Change	The proposals in the report seek to continue to support the Council's responsibilities and ambitions to reduce carbon impact in the Council and the Borough.
Diversity	There are no specific proposals that impact on diversity issues.
Wards Affected	All wards are affected
Groups Affected	All groups are affected by the Council Tax increase.
Budget and Policy Framework	The MTFP, Budget and Council Tax must all be decided by full Council
Key Decision	The MTFP, Budget and Council Tax must all be decided by full Council
Urgent Decision	The MTFP, Budget and Council Tax must all be decided by full Council
One Darlington: Perfectly Placed	Within the constraints of available resources it is necessary for the Council to make decisions involving prioritisation. The proposals contained in this report are designed to support delivery of the Sustainable Community Strategy, and the Council Plan within those constraints.
Efficiency	Efficiency savings which do not affect service levels have been included in the MTFP.
Impact on Looked After Children and Care Leavers	Children's social care continues to be resourced to provide good outcomes for Looked after Children or Care Leavers.

MAIN REPORT

Background and context

10. The Council has faced significant financial challenges as the Government responded to the worldwide economic downtown by introducing public sector spending reductions. This was exacerbated by a growing demand for services, particularly in relation to social care, both Adults and Children's services. In the case of Darlington Borough Council, a fundamental review of service provision was required and in 2016 following a need to reduce the budget by a further £12m the Council, following an in-depth and detailed review of all services, undertook a significant consultation exercise with the public during 2016. This resulted in the agreement of a Core Offer budget which reduced expenditure and services to a risk based minimum level with a small investment fund (The Futures Fund) of £2.5m per annum for services which the Council does not have to provide but which add great value to Darlington and its residents.

11. Subsequently following good progress made on achieving savings, strong cost management and innovative treasury initiatives the council was in a position to add to the futures fund and Members after listening to feedback agreed to use unallocated balances of £4.7m to invest in five areas which hold great value to our community.

12. The Council's Corporate Plan priorities and long-term goals, were used in setting the criteria for the Futures Fund investments with emphasis on maximising growth in the Darlington economy and ensuring everyone is able to share in the subsequent wealth creation within community.

13. As a consequence of looking to these long term goals the following five themes which are wholly consistent with the Council's corporate plan priorities were agreed:-

    (a) Community Safety
    (b) Maintain an attractive street scene environment
    (c) Maintaining a vibrant town centre
    (d) Developing an attractive visitor economy
    (e) Neighbourhood renewal

14. The funds are being utilised as expected to make positive change, the progress of which is detailed later in the report.

15. The core offer budget plus the futures fund as noted above is the starting position for this year's MTFP.

Updated Information and changes to the draft MTFP

16. As a result of updated information since the draft MTFP was approved for consultation, mainly due to the receipt of the provisional local government settlement, a number of changes have been made to this proposed MTFP. These changes along with the references to where they appear in the report are shown below:

No.	Change	Effect	Para	App
1	Settlement – New Homes Bonus	Improves reserves by £0.004m	47, 48, 60	7
2	Settlement – Top up Grant	Reduces reserves by £0.131m over the life of the MTFP	47, 48, 60	7
3	Settlement – RSG	Reduces reserves by £0.024m over the life of the MTFP	47, 48, 60	7
4	Settlement – Winter Pressures	Increases resources by £2.004 over the life of the MTFP as it is no longer ring-fenced. It has been passported to Adults to compensate for loss of grant income.	28, 47, 48, 60	1,7
5	Quarter 3 Revenue Budget Management	Improved position at Quarter 3 budget management increases reserves by £0.670m.	60	5,7
6	Council Tax 3.99%	Guidance states Council Tax should not be increased by 4% or more (including adult social care precept). Reduces reserves by £0.053m over the life of the MTFP.	6a, 38, 40, 47, 48, 57, 60	4, 7
7	Living Wage pressure	Reduces reserves by £1.061m over the life of the MTFP and increases Adults spend by equivalent amount.	15, 28, 48, 60	1,7

Financial Analysis

Projected Expenditure

17. Estimates attached at **Appendix 1** have been prepared based on current service levels and include known pressures and efficiencies which are summarised below and detailed in **Appendix 2** along with the assumption that additional Futures Funding is agreed and allocated as noted in Paragraph 61**.** The most significant pressures and efficiencies are however discussed in the following paragraphs. Assumptions used when preparing the estimates are set out at **Appendix 4**.

Summary of Pressures	**Estimate 20/21 £m**	**Estimate 21/22 £m**	**Estimate 22/23 £m**	**Estimate 23/24 £m**
Efficiencies/Savings offsetting pressures	(4.098)	(4.117)	(4.167)	(4.199)
Service Demand	4.003	4.014	4.043	3.984
Price Inflation	0.497	0.669	0.810	1.154
Reduced Income	0.147	0.130	0.130	0.130
Other	0.978	0.683	0.780	2.588
Current Savings Shortfalls	0.417	0.595	0.589	0.585
	1.944	1.974	2.185	4.242

18. **Efficiencies/Savings –** the largest saving comes from the reduction in anticipated pension scheme contributions. A triennial review of the Durham Pension Fund has concluded the Darlington scheme is 98.9% funded which subsequently means

there is less past service deficit repayments to be made in the next three years than anticipated. Furthermore, the future contribution rate will remain static and won't rise as anticipated over the next three years. The reasons given are better fund returns, a reduction in the life expectancy age and also an increase in employees joining the pension scheme following auto enrolment.

19. The transformation work in adult services to ensure people receive the right level of care and are able to stay in their own homes, has both improved the quality of people's lives as well as reducing the cost of provision with subsequent savings made in this area.

20. **Service demand** – the most significant pressure in this category is the increase in children coming into the local authorities care and the subsequent pressure on both Residential placement and Independent Fostering placement budgets. This pressure is being felt across the country with most Councils' reporting overspends. The Council has been awarded a £1.2m grant from the DfE to assist in transforming social care practice within Darlington and the team is working in partnership with Leeds City Council who have already been through this process. The ultimate aim is to improve outcomes for children, focus on prevention and reducing the number of children who need to come into care and ultimately reduce the budget pressure.

21. The increase in children services costs noted above also has an impact on staffing levels required in that area along with legal fees, both of which are presenting pressures over the MTFP.

22. Concessionary fares are likely to increase following a review and subsequent redistribution of cost between the Tees Valley Authorities.

23. **Inflation –** due to increases in the living wage and general inflation, above the 1.5% provided for in the expenditure budgets, additional funding is required for our social care providers and direct payment clients.

24. **Reduced Income** – Income received from parking fines has reduced over the last couple of years as enforcement officers tackle other pressing needs of the services but also due to different parking offers, e.g. the multi-storey car park which is pay on exit. The Parking offer is currently under review.

25. **Other –** the Council is required to auto enrol staff members into the Local Government Pension Scheme (LGPS) and every three years the Council must carry out re-enrolment of any staff who have left the scheme. Following this year's enrolment over 70 employees have decided to remain in the scheme. Whilst this is good for the employee it costs the Council 18.4% of the basic wage hence the pressure. There is however a tentative link to the reduction in overall pension rates and back funding deficit as the more employees paying future contributions helps fund the scheme.

26. There is also a one-year pressure against the council tax collection fund of £0.400m due to less properties being built than anticipated and higher exemptions and discounts being awarded for instance single person discount.

27. **Current Savings Shortfalls –** Members will recall the Council allowed for a risk contingency in the 2019/20 budget, this was to cover 60% of five specific pressures

which we were not certain if, or when, they would come to fruition. As reported in revenue budget monitoring the Children's services and Schools transport pressures have presented fully and therefore the contingency has been fully utilised and the 40% not provided for is now showing as a pressure in future years.

28. There is also a pressure of £0.180m for the library service where the full amount of planned savings has not been achieved following extended consultation on the library provision.

29. Income at Eastbourne Complex has increased however the service have been unable to generate enough to fully cover the cost of provision.

Total Expenditure

30. Taking all the above savings and pressures into account the projected expenditure is shown in the table below:-

	2020/21 £m	2021/22 £m	2022/23 £m	2023/24 £m
Children and Adult Services	58.423	60.839	62.815	64.048
Economic Growth & Neighbourhood Services	20.867	22.173	22.969	23.671
Resources	10.229	10.412	10.707	10.882
Financing costs	0.895	1.096	1.419	3.196
Investment Returns	(1.028)	(0.812)	(0.517)	(0.494)
Council Wide Pressures/(savings)	0.405	0.004	0.008	0.004
Council Wide Contingencies *	0.522	0.525	0.525	1.512
Total Expenditure	90.313	94.237	97.926	102.819

* Includes apprentice levy and previously agreed risk contingency for provision ordinary residency costs in Adult services.

Projected Income

Finance Settlement – December 2019.

31. On the 20 December 2019 the draft Local Government Finance Settlement was announced and at the time of writing a consultation has taken place and we are awaiting the results. It is not thought however there will be significant changes to the estimates in the report.

32. As the settlement only covered the year 2020/21 the following three years are estimates based on the most up to date information available. All assumptions are summarised in Appendix 4 and detailed in the relevant sections below.

Core Grant funding to Local Government

33. **Revenue Support Grant (RSG)** has become a reducing element of the Council core funding over recent years and we were anticipating a further reduction in 2020/21. However as announced in the spending round we have confirmation RSG will remain for 2020/21and has received an inflationary increase. It is anticipated this funding will continue over the further three years of the MTFP and this has been built into the estimates.

34. **New Homes Bonus (NHB)** is included in core Government funding as it is top sliced from RSG. However, in the 2017/18 Local Government Finance Settlement, changes to the formula were announced and there was a national baseline of 0.4% with no NHB paid until the increase in numbers is above this limit, which for Darlington is 164. In 2018/19 the NHB payment for each property of 6 years was reduced to 4 years and in this settlement it has been proposed there will be no new payments going forward but legacy payments for NHB will be paid.

35. As part of the Economic Growth Strategy, the Council is working towards increasing housing numbers to meet the needs of our population particularly as the economy is growing well and new jobs being created with a subsequent inward migration and increased demand for housing. The current financial incentives in terms of NHB are £1,671 per band D equivalent property with an additional £350 for affordable housing. Whilst it is disappointing NHB is unlikely to be received in the future the Council also receives additional Council Tax for each property so clearly housing growth is key to sustaining the Councils MTFP.

36. Members will recall that previous year changes to the NHB scheme along with the reduction in RSG funded the Improved Better Care Fund (iBCF) which was separate to the funding stream allocated direct to the NHS. This was in recognition that Councils were under significant pressure in regard to social care funding, confirmation has been received that this will continue in 2020/21 with inflation. For estimate purposes it has been assumed this funding will continue given it is part of the core funding settlement.

Additional Funding announced in the Spending Review

37. **Social Care funding** - In recognition of the significant pressures being faced by Council in social care due to the growing elderly population and increases in children looked after, the Chancellor announced an extra £1.5 billion for social care. £1billion through grant and £500 million through the adult social care precept. Darlington's proportion is confirmed at £2m with an additional £1m from the Adult Social Care precept. Furthermore, it has been indicated the grant funding (not the precept) will continue into future years.

38. **Social Care Grant and Winter Pressures funding** – Both of these grants have been continued into 2020/21. With regard to the winter pressures money, this has now been mainstreamed into the core baseline funding.

Council Tax Income

39. Due to reduction and reliance on Government funding over the last ten years, Council Tax is now by far the largest single funding stream and will increase further as a percentage over the coming years as it represents 60% of all income

anticipated. The on-going increases reflect the Cabinet's view that income from Council Tax must increase to protect key services. Members will recall that a 1% increase in Council Tax equates to an annual revenue of £0.502m.

40. In 2018/19 and 2019/20 Local Authorities were given more flexibility by increasing the Council Tax referendum limit to no more than 3%, in the spending review this year it was announced that council tax should be lower than 2%. The figure is lower than council tax revenue previously estimated. The estimates have assumed an ongoing 1.99% increase in Council Tax.

41. However, as previously noted the Chancellor announced extra social care funding of which £500 million was through the adult social care precept at 2%. Adult social care has the largest overall budget and the precept is required to help in funding the on-going sustainability of the services. The precept is on top of the 1.99% council tax increase noted in the preceding paragraph. The assumption is the precept is for one year only so going forward has not been included in the estimates.

42. Planning estimates anticipate growth levels to be an average of 433 band D equivalent properties over the period of this plan which is a growth on the tax base of 1.38% and lower than anticipated in the current MTFP. This is a consequence of the slowdown in the market. These figures have been used to prepare the estimates; clearly should this be any different income levels will differ. The collection rate is anticipated to remain at 99% in 2020/21.

43. Taking the above into account Council Tax income over the period of this plan is estimated as follows:-

	2020/21 £m	**2021/22 £m**	**2022/23 £m**	**2023/24 £m**
Total Council Tax anticipated	52.179	53.951	55.697	57.450

National Non-Domestic Rates (NNDR)

44. The Council retains 49% of NNDR collected and can gain or lose depending on whether the net tax collected increases or decreases. The Government via the valuation office sets rateable values and the rate paid in the pound is increased each year in line with the CPI. The business tax-base is far more volatile than the council tax base and requires very close monitoring. In addition to the potential to "lose" income due to business closures the Council also carries the risk of losing appeals by businesses against valuations.

45. Members will recall one of the three conditions identified to help the Council tackle the reduction of government grant and increasing service demand was to grow the economy. The Council's Economic Strategy gives priority to increasing business within the borough and significant effort has been put into achieving growth. This has been rewarded with a positive net increase in current and projected NNDR collected over the MTFP. Sites such as Symmetry Park, Feethams House and the Horizon centre are all contributing to the growth. Notwithstanding these major developments, attracting businesses into the Town by their very nature takes time

and upfront investment so this is an area which needs continued prioritisation and pump prime funding so growth can continue. It needs to be remembered that net growth in NNDR collected relies on growth outstripping revaluations and reductions which can be challenging in the current economy.

46. The in-year collection rate target for NNDR is 98.0% and as at the end of December 2019 the actual collection figure is 80.8% with three months to go and so is on track to achieve the target.

47. Taking the above into account the projections of NNDR are shown below

	2020/21 £m	**2021/22 £m**	**2022/23 £m**	**2023/24 £m**
Business Rates retained locally	18.901	19.256	19.620	19.991

Collection fund

48. The Collection Fund account reflects the statutory requirements for the Council to maintain a separate Fund in relation to the operation of Council Tax and Business Rates Retention Scheme (BRRS). The Fund records all of the transactions for billing in respect of Non-Domestic Rates (NNDR) and Council Tax, exemptions and discounts granted, provision for bad debts and appeals and payments made to the Council's General Fund, the Police and Fire and Rescue precept authorities and Central Government. There is a £0.400m pressure in 2019/20 relating to the Council Tax fund which has been taken into account in revenue budget management. The NNDR fund is balanced.

Other Grants

49. Set out below are the estimated specific grants which as the title suggests are for specific areas of expenditure as dictated by the government and cannot be used for other areas. These grants are included in service estimates at Appendix 1.

	2020/21 £m
Public Health Grant	8.236
PFI Grant	3.200
Troubled Families Grant	0.326
Discretionary Housing Payments	0.200
Youth Justice Board	0.223
Local Reform & Community Voices	0.057
Adult & Community Learning	1.300
Staying Put	0.050
Bikeability	0.029
Heritage Access Zone	0.045
Heritage Lottery Fund	0.047
Skerningham & Burtree Garden Village	0.150
	13.863

Total Income

50. The table below summaries the Council's estimated income for the period of this plan which thanks to the increase in social care funding, continued economic growth and house building activity and the subsequent increases in council tax and NNDR, confirms a much-needed increase in income given our expenditure pressures.

Resources - Projected and assumed	**2020/21 £m**	**2021/22 £m**	**2022/23 £m**	**2023/24 £m**
Council Tax	52.179	53.951	55.697	57.450
Business rates retained locally	18.901	19.256	19.620	19.991
Top Up Grant	7.297	7.443	7.592	7.744
RSG	3.614	3.614	3.614	3.614
New Homes Bonus	1.285	0.717	0.425	(0.000)
Better Care Fund	4.356	4.356	4.356	4.356
Adult Social Care Support Grant	0.952	0.952	0.952	0.952
Additional Social Care Grant	2.000	2.000	2.000	2.000
Total Resources	**90.584**	**92.289**	**94.256**	**96.107**

Projected MTFP

51. Set out in the table below are the projections based on the income and expenditure analysis discussed in the previous sections of this report along with the required use of balances over the period. The projections assume additional futures funding is agreed and allocated as described in paragraph 61.

	2020/21 £m	**2021/22 £m**	**2022/23 £m**	**2023/24 £m**
Estimated Expenditure	88.369	92.263	95.741	98.577
Add Pressures / Additional savings	1.944	1.974	2.185	4.242
	90.313	94.237	97.926	102.819
Projected Total Resources	(90.584)	(92.289)	(94.256)	(96.107)
Projected budget (surplus)/deficit	(0.271)	1.948	3.670	6.712
Utilisation of balances	0.271	(1.948)	(3.670)	(6.712)
Total	0.000	0.000	0.000	0.000

Futures Fund

52. As noted earlier in 2018/19 the Council allocated £4.7m over the life of the MTFP (2018/19 to 2021/22) to the futures fund. £1.6m for the four-year ongoing funding for Community Safety and Maintaining an Attractive Street Scene Environment. The remaining £3.1m was allocated between five themes.

53. To date £2.081m has been committed to the themes with a balance of £1.019m remaining. A summary of commitments is noted below.

Futures Fund - Theme 1 - Community Safety (£0.600m)

54. £0.552m of the fund has been committed, £0.517m on staffing across the four years. This is to improve resilience and robustness in the team particularly as community safety is a key priority for the Council. £0.035m was for the purchase of a mobile CCTV camera.

Futures Fund - Theme 2 – Maintaining an Attractive Street Environment (£0.500m)

55. £0.108m has been allocated to employ an Arboricultural team leader to help address the increasing workload in regard to trees. The remaining funding has not been committed yet. The core funding allocation of £0.300m per annum has made a significant impact on the street environment. Grass cutting returned to a 12-15 day cycle which improved the look of the borough over the summer period and more frequent cleanses and litter picks have made a noticeable difference. Floral displays helped in achieving the Northumbria in bloom awards accolades.

Futures Fund - Theme 3 – Maintaining a Vibrant Town Centre (£1m)

56. The Town Centre faces a number of challenges as do many towns across the country due to the increase in on-line shopping and out of town retailing. £0.921m of the funding has been committed across a number of areas including a one of grant to the House of Fraser to facilitate the store remaining open following the financial difficulties they face and the announcement of store closures across the country. The fund is also supporting the extension to the two-hour free car parking initiative along with the free on Sunday trial until May 2020. We have also invested in a Town Centre partnership officer position and also committed to a full events programme to target more footfall.

Futures Fund - Theme 4 – Developing an Attractive Visitor Economy (0.500m)

57. Only a small amount of funds £0.080m has been committed against this theme for Heritage Action zone funding at present as it was to be mainly focused on the Experience Darlington Strategy or the 2025 200th Anniversary of the opening of the Stockton and Darlington Railway to pump prime investment and match fund initiatives on these and other culture opportunities.

Futures Fund - Theme 5 – Neighbourhood Renewal (0.500m)

58. One of the Council priorities is to work with communities to maximise their potential and enjoy a good quality of life. The funding in this theme is aimed at assisting with this priority and £0.420m has been allocated to various initiatives including £0.050m to the Darlington Credit Union to enable them to continue work in

addressing financial hardship and across households in Darlington; £0.090m for a skills and employability officer to understand what skills are required in the borough and take action to promote employment; £0.150m to run initiatives and part fund a programme officer for the Northgate project which is a multi-agency programme providing a range of interventions from support and advice to enforcement activities where required in order to improve outcomes for local residents; and £0.020m for the pilot In2 Programme which introduces children who wouldn't usually have access to arts and cultural experiences. There has also been an allocation of £0.016m for a holiday hunger scheme through the school holidays and £0.035m to support work to embed community wealth building across the Council and partners.

Revenue Balances

59. Taking into account the projected revenue out turn for 2019/20 detailed at **Appendix 5**, along with the assessment of required risk balances as set out in **Appendix 6** and the utilisation of balances to fund the projected budget deficit over the four year period, leaves a projected general fund balance of £5.483m by 2023/24 which is a significant improvement on the current MTFP.

60. However, the unallocated balances rely on building around 433 houses per year, no significant overspending, assumptions of additional income in the spending review for future years materialising, a Council Tax increase of 1.99% and an adult social care precept of 2.00% giving an overall increased to Council tax of 3.99%. We therefore need to be cautious particularly in light of future years estimated income, but we understand the need to invest into our services as much as possible to stimulate growth and tackle inequality.

61. As balancing the MTFP requires the use of reserves it is sensible that any unallocated balances should be used to:-

    (a) To minimise on-going committed annual spending to assist and work towards eradicating future years funding gaps.

    (b) Invest into the Futures Fund to stimulate growth and invest in our communities over the four years of the MTFP.

Use of Revenue Balances

62. Given the pressure on budgets and the limited funds for discretionary services it is recommended that £1.800m of the unallocated balances is utilised for the Futures Fund to replenish priority funding and support the Councils ongoing priorities for a further two years to 2023/24. £0.800m for the ongoing commitments in Street Scene and Community Safety at £0.600m and £0.200m respectively. £0.350m to bolster the one-off Community Safety theme to allow the continuation of the additional staffing; £0.500m to maintaining a vibrant Town Centre given the significant pressures all town centres are facing and the great work the current futures fund has enabled. And finally, £0.150m for neighbourhood renewal to replenish the fund which is being utilised on a key priority as noted above.

63. If the additional £1.8m for the Futures Fund is agreed the revised revenue reserve closing balance position at the end of 2023/24 would be £3.683m as shown below which it is a welcomed position. However, given the uncertainties in regard to

future funding and expenditure pressures it is recommended the balance remains unallocated to assist in future pressures or mitigation of the year 5 gap.

Revenue Balances	**2020/21 £m**	**2021/22 £m**	**2022/23 £m**	**2023/24 £m**
Opening balance	19.235	15.013	14.065	10.395
Risk Reserve	(4.350)			
Futures Fund Reserve balance	(1.143)			
Contribution to/(from) balances	0.271	(1.948)	(3.670)	(6.712)
Contribution from Collection Fund	1.000	1.000	0.000	0.000
Closing balance	**15.013**	**14.065**	**10.395**	**3.683**

Consultation

64. Consultation on the draft plan ran from the 19 December 2019 to the 30 January 2020 and was discussed at Cabinet on the 7 January and promoted on the Council's Website as well as social media.

65. The Economy and Resources Committee met on 23 January 2020 to consider the draft MTFP and the responses from all the Council's Scrutiny Committees. The minutes are shown in **Appendix 8**, in summary there was a majority support for the Council Tax increase of 1.99%. the Adult Social Care Precept of 2% and the fees and charges levels.

66. No further feedback has been received.

Conclusion

67. The MTFP as agreed by Council remains deliverable but as previously acknowledged it is not without risk and challenges. Some risks previously identified have occurred and the recommendations within this report address the associated financial implications. The proposed MTFP includes the retention of the Risk Reserve to offset further unforeseen risks and the provision of a risk contingency in adult social care to cover a specific significant value risk which is already known.

68. The Council still has the financial capacity to deliver a four-year balanced MTFP which puts it in a much stronger position than many Councils, however this is based on a core offer service level with limited discretionary services. To add to this offer, available revenue balances have been utilised to create five Future Fund Investments themes which are helping to stimulate growth and assist with a key priority of growing the economy. As balances have improved it is proposed a further £1.8m is used to supplement the futures fund themes. Despite significant pressures faced in Children's Services, the proactive stance taken in growing the economy is working and assisting in minimising on-going committed annual spending to assist and work towards eradicating the unfunded budget gap in 2024/25.

69. Planning beyond the current MTFP is extremely difficult given the uncertainty around the new Local Government financial system now planned for 2021 and issues such as the impact of Brexit on the country's finances. Given the four-year

balanced position the proposed plan will allow Members time, post the fair funding review to assess the impacts of the changing landscape and make its decision on how it will address the future financial position it faces. Current planning suggests there will be a budget deficit of approximately £6.7m for the Council to address (assuming ongoing Futures Fund commitments are continued) however for the reason above, this will almost certainly change but at this stage it is not possible to know whether this will be a positive or negative position.

70. In summary, the Council continues to face significant financial challenges, however, the MTFP remains deliverable on the basis of what we know now and the following conditions – economic growth, house building, no further pressures, fair funding review and a fair settlement, if this changes plans will need to be adjusted.

71. As the Council's Statutory Chief Financial Officer, the Assistant Director Resources, must advise the Council on the robustness of the budget and adequacy of reserves. The budget presented to Members in this report has been based on the most accurate information available known at this point in time, therefore the Assistant Director is confident that they are an accurate reflection of the Council's financial position. General Fund Reserves are adequate however the Council is carrying a financial risk over the lifetime of the plan which is difficult to forecast at present, in particular the implications and impacts of Brexit and the uncertainty around the fair funding review. It is essential that growing pressures in children's services are addressed through transformation and implemented as the Council will be operating with minimum levels of balances to fund any future cost pressures.

APPENDICES

Appendix 1	Detailed Estimates
Appendix 2	Budget Pressures / Savings
Appendix 3	Fees and Income Proposals
Appendix 4	Assumptions used to prepare estimates
Appendix 5	Projected Revenue Outturn 2019/20
Appendix 6	Assessment of Risk Balances
Appendix 7	Proposed MTFP 2020 to 2024
Appendix 8	Consultation – Economy and Resources Committee Minutes.

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REVENUE ESTIMATES 2020/21 - Summary

Appendix 1

	2019/20	2020/21			
	Net Budget	Gross Budget	Income	Grants	Net Budget
	£000	£000	£000	£000	£000
Children and Adults	57,152	111,751	(14,981)	(38,347)	58,423
Economic Growth & Neighbourhood Services	21,193	91,281	(44,704)	(25,710)	20,867
Resources	10,240	12,497	(2,268)	0	10,229
Group Totals	**88,585**	**215,529**	**(61,953)**	**(64,057)**	**89,519**
Financing Costs	510	895	0	0	895
Investment Returns - Joint Ventures	(1,212)	(1,028)	0	0	(1,028)
Council Wide Pressures / Savings	382	405	0	0	405
Contingencies	(2,093)	522	0	0	522
Grand Total	**86,172**	**216,323**	**(61,953)**	**(64,057)**	**90,313**

Revenue Estimates 2020/21

CHILDREN & ADULT SERVICES

	2019/20	2020/21			
	Net Budget	Gross Budget	Income	Grants	Net Budget
	£000	£000	£000	£000	£000
Director of Adults & Children's Services	186	160	0	0	160
Children & Adult Services					
Transformation & Performance	568	663	(68)	(37)	558
Business Support	1,277	1,327	0	0	1,327
Children's Services					
Children's Services Management & Other Services	523	537	0	0	537
Assessment Care Planning & LAC	2,938	3,487	0	0	3,487
First Response & Early Help	2,264	2,765	0	(289)	2,476
Adoption & Placements	12,394	13,883	(93)	(50)	13,740
Youth Offending / ASB	268	598	(127)	(223)	248
Quality Assurance & Practice Improvement	442	546	(127)	0	419
Development & Commissioning					
Commissioning	2,252	2,256	(96)	0	2,160
Workforce Development	260	205	0	0	205
Voluntary Sector	417	339	0	(57)	282
Education					
Education	954	21,673	(1,142)	(19,475)	1,056
Schools	0	9,432	0	(9,432)	0
Transport Unit	1,438	2,231	0	(548)	1,683
Public Health & Community Safety					
Public Health	100	8,246	0	(8,236)	10
Healthy New Towns	59	0	0	0	0
Adult Social Care & Health					
External Purchase of Care	24,764	35,112	(11,265)	0	23,847
Intake & Enablement	636	2,034	(1,444)	0	590
On-going Long Term Care - Older People	1,387	1,514	(129)	0	1,385
On-going Long Term Care - Physical Disability	4	57	(52)	0	5
On-going Long Term Care - Learning Disability	1,648	1,723	(36)	0	1,687
On-going Long Term Care - Mental Health	998	1,525	(402)	0	1,123
On-going Long Term Care - Disabled Children's	460	473	0	0	473
Service Development & Integration	915	965	0	0	965
Total Adults & Children's Services	**57,152**	**111,751**	**(14,981)**	**(38,347)**	**58,423**

Revenue Estimates 2020/21

Economic Growth & Neighbourhood Services

	2019/20 Net Budget	2020/21 Gross Budget	2020/21 Income	2020/21 Grants	2020/21 Net Budget
	£000	£000	£000	£000	£000
Director of Economic Growth & Neighbourhood Services	170	167	0	0	167
Planning, Economic Initiatives & Asset Management					
AD - Economic Growth	133	127	0	0	127
Bidra	0	0	0	0	0
Building Control	145	296	(158)	0	138
Development Management	(68)	576	(648)	0	(73)
Economy	247	196	0	0	196
Environmental Health	295	309	(17)	0	292
Place Strategy	562	807	(30)	(195)	582
Property Management and Estates	(580)	532	(1,135)	0	(603)
Capital Projects, Trtansport & Highways Planning					
AD - Transport & Capital Projects	127	124	0	0	124
Building Design Services	41	512	(493)	0	19
Capital Projects	349	550	(248)	0	302
Car Parking R&M	554	566	0	0	566
Concessionary Fares	3,292	3,793	0	0	3,793
Flood and Water Act	84	86	0	0	86
Highways	2,578	3,048	(606)	(29)	2,413
Highways - DLO	(450)	8,114	(8,612)	0	(498)
Investment and Funding	421	175	(184)	0	(9)
Sustainable Transport	195	318	(55)	0	263
Community Services					
AD - Community Services	127	124	0	0	124
Allotments	11	21	(11)	0	11
Building Cleaning - DLO	146	717	(591)	0	125
Cemeteries and Crematorium	(830)	648	(1,518)	0	(870)
Community Services - Other DLO	0	0	0	0	0
Dolphin Centre	590	3,333	(2,785)	0	548
Eastbourne Complex	(52)	112	(128)	0	(16)
Emergency Planning	95	97	0	0	97
Head of Steam	252	310	(61)	0	249
Hippodrome	95	4,801	(4,765)	(33)	2
Indoor Bowling Centre	11	20	(6)	0	14
Libraries	681	833	(42)	0	790
Move More	2	163	(134)	0	29
Outdoor Events	374	414	(22)	0	392
School Meals - DLO	38	677	(618)	0	59
Strategic Arts	125	110	0	0	110
Street Scene	5,022	7,044	(2,046)	(14)	4,984
Transport Unit - Fleet Management	(16)	54	(70)	0	(16)
Waste Management	2,827	2,936	0	0	2,936
Winter Maintenance	421	430	(2)	0	428
Community Safety					
CCTV	218	573	(385)	0	188
Community Safety	524	590	(17)	0	573
General Licensing	0	151	(151)	0	0
Parking	(2,055)	196	(2,276)	0	(2,081)
Parking Enforcement	57	247	(177)	0	69
Private Sector Housing	77	82	(10)	0	72
Stray Dogs	44	44	(1)	0	43
Taxi Licensing	0	198	(198)	0	0
Trading Standards	226	230	(6)	0	224

Economic Growth & Neighbourhood Services (continued)

	2019/20 Net Budget	2020/21			
		Gross Budget	Income	Grants	Net Budget
	£000	£000	£000	£000	£000
Building Services					
Construction - DLO	(397)	11,160	(11,627)	0	(467)
Maintenance - DLO	(409)	3,360	(3,818)	0	(458)
Other - DLO	49	0	0	0	0
Corporate Landlord	3,069	3,366	(207)	0	3,159
General Support Services					
Works Property & Other	107	109	0	0	109
Joint Levies & Boards					
Environment Agency Levy	109	112	0	0	112
Outside Contributions	53	(0)	0	0	(0)
Housing					
Local Taxation	468	888	(284)	(144)	460
Rent Rebates / Rent Allowances / Council Tax	(132)	24,614	(132)	(24,614)	(132)
Housing Benefits Administration	203	902	0	(681)	221
Customer Call Centre	279	449	(178)	0	271
Homelessness	313	394	(97)	0	297
Service, Strategy & Regulation and General Services	189	332	(154)	0	178
Total Economic Growth & Neighbourhood Services	21,193	91,281	(44,704)	(25,710)	20,867

Revenue Estimates 2020/21

Resources

	2019/20 Net Budget	2020/21			
		Gross Budget	Income	Grants	Net Budget
	£000	£000	£000	£000	£000
Managing Director	196	257	(94)	0	163
Darlington Partnership	18	121	(84)	0	37
AD Resources					
Financial Services & Governance	1,409	1,704	(297)	0	1,407
Financial Assessments & Protection	233	301	(40)	0	261
Communications & Engagement	921	917	(123)	0	794
Systems	741	760	(7)	0	753
Xentrall Services (D&S Partnership)	1,621	2,341	(648)	0	1,693
Human Resources	586	824	(242)	0	582
Health & Safety	134	188	(52)	0	136
AD Law & Governance					
Complaints & Freedom of Information	191	190	(4)	0	186
Democratic Support	1,345	1,224	(24)	0	1,200
Registrars of births, deaths and marriages	(11)	225	(254)	0	(29)
Administration	706	787	(90)	0	697
Legal & Procurement	1,177	1,694	(297)	0	1,397
Coroners	200	215	0	0	215
AD ICT	773	749	(12)	0	737
Total Resources	**10,240**	**12,497**	**(2,268)**	**0**	**10,229**

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Pressures / Savings	Estimate 20/21 £m	Estimate 21/22 £m	Estimate 22/23 £m	Estimate 23/24 £m
Savings				
Morton Park car parking	(0.050)	(0.050)	(0.050)	(0.050)
Childrens Safeguarding Board reduction	(0.042)	(0.068)	(0.073)	(0.075)
Adults Packages	(0.749)	(0.745)	(0.741)	(0.682)
Adults other supplies and services and ICT	(0.367)	(0.365)	(0.364)	(0.333)
Pension savings following trienial review	(1.874)	(1.905)	(1.984)	(2.110)
TVCA - contribution saving	(0.050)	(0.050)	(0.050)	(0.050)
	(3.132)	(3.183)	(3.262)	(3.300)
Increased Demand				
Concessionary Fares - potential change to apportionments	0.406	0.412	0.419	0.425
Sustainable Transport - previous years Government funding available, awaiting clarity on possibility of future bids	0.073	0.000	0.000	0.000
Street Scene - Additional refuse round anticipated as new houses are built	0.000	0.182	0.235	0.287
Waste Disposal - Increase based on new homes	0.024	0.048	0.072	0.096
Climate change officer - to sustain Green agenda	0.050	0.052	0.055	0.056
Childrens complaints	0.030	0.030	0.030	0.030
Childrens Placements	1.373	1.610	1.622	1.610
Childrens - additional staffing	0.591	0.637	0.535	0.405
Childrens - increase in legal fees	0.150	0.150	0.150	0.150
Additional cost of Improvement Grants	0.015	0.015	0.015	0.015
Homeless Trailblazer contract extended to March 21	0.064	0.000	0.000	0.000
Transport - additional costs for new routes	0.120	0.123	0.126	0.129
Resources additional staffing	0.019	(0.014)	0.034	0.033
Legal new software requirements	0.030	0.020	0.020	0.020
Coroners increase in service	0.011	0.012	0.013	0.014
Adults MCA assessors	0.122	0.000	0.000	0.000
	3.078	3.277	3.326	3.270
Current Savings shortfall				
Library service	0.180	0.180	0.180	0.180
Eastbourne complex	0.100	0.100	0.100	0.100
Transport - Home to school	0.105	0.126	0.126	0.126
Childrens & Adults Business Support	0.032	0.035	0.035	0.035
	0.417	0.441	0.441	0.441
Price Inflation				
Utilities/Waste Disposal etc	0.000	0.000	0.000	0.141
Adults Domiciliary / Direct Payments	0.293	0.404	0.516	0.715
NationaLiving Wage	0.204	0.265	0.294	0.298
	0.497	0.669	0.810	1.154
Reduced Income				
St Teresa's RC School Meals - service to be reviewed post 20/21	0.017	0.000	0.000	0.000
Parking enforcement	0.130	0.130	0.130	0.130
	0.147	0.130	0.130	0.130
Other				
Childrens staffing and expenses	0.053	0.054	0.060	0.062
Adults Staffing - Social Worker career grades and retention	0.158	0.233	0.311	0.311
CT collection Fund deficit	0.400	0.000	0.000	0.000
Financing Costs MRP	0.000	0.000	0.000	1.800
Resources supplies and services	0.005	0.027	0.042	0.041
Council wide auto-enrolment into pension scheme	0.321	0.326	0.327	0.333
	0.937	0.640	0.740	2.547
Total net pressures / (Savings)	1.944	1.974	2.185	4.243

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APPENDIX 3

SCHEDULE OF CHARGES 2020/21

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
LEARNING SKILLS - LEARNING FOR LIFE Fees Policy: August 2019 to July 2020 (Next Review July 2020)				
Full Fees (including enrolment and tuition fees) per hour	L	3.00	3.00	**NIL**

Accredited Learning
Full accreditation fee (if applicable) - if the course has a qualification there will be additional fees to pay for registration and certification.

No fees will be charged for publicly subsidised courses where:
1. Learners are aged 16-18 (on 31 August 2019)
2. Learners are aged 19-24 (on 31 August 2019) with a learning difficulty and/or disability as evidenced through an Education, Health and Care (EHC) Plan
3. Learners are aged 19 or older where the learning aim is up to and including level 2, and the learner is studying English or Maths
4. Learners are aged 19-23 (on their first day of study) and are studying their first 'full' level 2 or first 'full' level 3, excludes English for speakers of Other Languages (ESOL)
5. Learners are aged 19 or older where the learning aim is up to and including level 2 (including ESOL), the skills training will help them into work, and the learner is classed as unemployed and one or more of the following apply:
    a. They receive Job Seeker's Allowance (JSA) - this includes those receiving National Insurance credits only, or
    b. They receive Employment and Support Allowance (ESA), or
    c. They receive Universal Credit and their earned income from employment (disregarding benefits) is less than £338 a month (learner is sole adult in their benefit claim) or £541 a month (learner has a joint benefit claim with their partner)
    d. They are released on temporary licence, studying outside a prison environment, and not funded by the Ministry of Justice

6. Learners are aged 19 or older where the learning aim is up to and including level 2 (including ESOL), they are employed and eligible fr co-funding but earn less than £16,009.50 gross salary, based on the assumption of a 37.5 hour contract with paid statutory holiday entitlement.

Evidence required: A wage slip within 3 months of the learning start date, or a current employment contract which states gross monthly / annual wages
7. Learners aged 19-24 who are unemployed and on a Traineeship

Courses with no public subsidy
For learners aged 19 or above and where the learning aim is level 3 or above (except for exclusion above), learners will need to take out an Advanced Learning Loan, subject to funding availability. Further details can be found at: www.gov.uk/advanced-learning-loans

Asylum Seekers – individuals will be assessed for eligibility in conjunction with SFA
Special Fees – some courses have special fees, cost on application
FE course – NVQ etc price on application
The following courses are free:
Family Learning, Functional Skills, Study Programmes and courses which are funded through external projects
Additional Learning Support (ALS) is intended to enable disadvantaged learners to achieve their learning goal by providing funding, on top of programme funds, to help them overcome their barriers to learning. The funding is intended to be flexible and to help support learners who have a range of learning difficulties and/or disabilities

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
REGISTRATION OF BIRTHS, DEATHS, MARRIAGES AND CIVIL PARTNERSHIPS				
The following fees do not incur VAT				
Marriages				
Entering a Notice of Marriage or Civil Partnership	N			
For a Registrar to attend a Marriage at the Register Office	N			
Civil Partnership Registration	N			
Incumbents for every Entry Contained in Quarterly Certified	N			
Copies of Entries of Marriage	N			
Registrars fee for attending a marriage at a registered building or for the housebound or detained	N			
Superintendents Registrar fee for attesting a notice of marriage away from his office for housebound or detained	N			
Superintendents Registrar fee for attending the marriage of the housebound or detained	N	These charges set nationally by Statute and will be charged at the advised rate for 2019/20	These charges set nationally by Statute and will be charged at the advised rate for 2020/21	
Certification for Worship and Registration for Marriages				
Place of Meeting for Religious Worship	N			
Registration of Building for Solemnisation of Marriage	N			
Certificates issued from Local Offices				
Standard Certificate (SR)	N			
Standard Certificate (RBD) (at time of Registration)	N			
Standard Certificate (RBD) (after Registration)	N			
Short Certificate of Birth (SR)	N			
Short Certificate of Birth (RBD)	N			
Certificates of Civil Partnership (at time of Ceremony)	N			
Certificates of Civil Partnership (at later date)	N			
General Search fee	N			
Each Verification	N			
Civil Partnership Ceremony	N			
All Ceremonies – Approved Premises				
Application Fee (3 years)	N	1,700.00	1,700.00	
Fee for Attendance Monday to Saturday	L	525.00	525.00	
Fee for Attendance Sunday	L	525.00	525.00	
Fee for Attendance Bank Holidays	L	525.00	525.00	
All Ceremonies – Town Hall				
Monday to Saturday	L	275.00	275.00	
REGISTER OF ELECTORS, OPEN REGISTER AND MONTHLY UPDATES - SALE				
The following fees do not incur VAT.				
Register – Printed Form	N	10.00	10.00	
Per 1,000 Names – Printed	N	5.00	5.00	
Register – Data Form	N	20.00	20.00	
Per 1,000 Names – Data	N	1.50	1.50	
LIST OF OVERSEAS ELECTORS – SALE				
The following fees do not incur VAT.				
List – Printed Form	N	10.00	10.00	
Per 1,000 Names – Printed	N	5.00	5.00	
List – Data Form	N	20.00	20.00	
Per 1,000 Names – Data	N	1.50	1.50	
MARKED COPY OF THE REGISTER OF ELECTORS AND MARKED ABSENT VOTERS LIST - SALE				
The following fees do not incur VAT				
Register – Printed Form	N	10.00	10.00	
Per 1,000 Names – Printed	N	2.00	2.00	
Register – Data Form	N	10.00	10.00	
Per 1,000 Names – Data	N	1.00	1.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
TOWN HALL				
Hire of Committee Rooms – all charges shown exclusive of VAT. Charges will be made plus the appropriate VAT rate.				
All rooms are to be charged by the hour, rather than by session				
Committee Rooms per hour	L	32.00	33.00	
				Minimal
LAND CHARGES				
The following fees are inclusive of VAT				
Search Fees				
Standard Search - Residential Property (post or DX)	L	91.80	91.80	
Standard Search – Residential Property (electronic)	L	89.80	89.80	
Standard Search – Commercial Property (post or DX)	L	139.80	139.80	
Standard Search – Commercial Property (electronic)	L	137.80	137.80	
Con 29 Required				
Residential Property				
One Parcel of Land	L	76.80	76.80	
Several Parcels of Land – Each Additional Parcel	L	24.00	24.00	
Commercial Property				
One Parcel of Land	L	124.80	124.80	
Several Parcels of Land – Each Additional Parcel	L	24.00	24.00	
Con 29 Optional				
Each Printed Enquiry	L	6.00	6.00	
Own Questions	L	6.00	6.00	
Official Search – LLCI	L	15.00	15.00	
Official Search – NLIS (National Land Information Service) or email	L	13.00	13.00	
Expedited Search (Residential)	L	165.00	165.00	
Expedited search (Commercial)	L	225.00	225.00	
Personal Search	L	No charge	No charge	
				NIL

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
FINANCIAL PROTECTION SERVICES				
Category				
I. Work up to and including the date upon which the court makes an order appointing a deputy for property and affairs	N	745.00	745.00	
II. Annual management fee where the court appoints a local authority deputy for property and affairs, payable on the anniversary of the court order:				
- for the first year	N	775.00	775.00	
- for the second and subsequent years	N	650.00	650.00	
where the net assets are below £16,000, the local authority deputy for property and affairs will take an annual management fee not exceeding 3% of the net assets on the anniversary of the court order appointing the local authority as deputy				
Where the court appoints a local authority deputy for health and welfare, the local authority will take an annual management fee not exceeding 2.5% of the net assets on the anniversary of the court order appointing the local authority as deputy for health and welfare up to a maximum of £500.				
III. Annual property management fee to include work involved in preparing property for sale, instructing agents, conveyancers, etc or the ongoing maintenance of property including management and letting of a rental property	N	300.00	300.00	
IV. Preparation and lodgement of an annual report or account to the Public Guardian	N	216.00	216.00	
V. Conveyancing Costs				
Where a deputy or other person authorised by the court is selling or purchasing a property on behalf of P, the following fixed rates will apply except where the sale or purchase is by trustees in which case, the costs should be agreed with the trustees:	N	See Description	See Description	
A value element of 0.15% of the consideration with a minimum sum of £350 and a maximum sum of £1,500, plus disbursements				
Travel Rates are allowed at a fixed rate per hour for travel costs Please note that these rates are set by The Office of Public Guardian and are the rates as of 1st April 2017, these may be amended during 2020/21	N	40.00	40.00	
Adminstration fee for arranging the care and support needs for those with capital in excess of the upper capital limit or those who have chosen not to disclose their financial information.	L	100.00	105.00	
				Minimal
DEFERRED PAYMENT FEES				
Administration cost for setting up a Deferred Payment Agreement	L	300.00	315.00	
plus cost of valuation (this will be dependant on property type)	L	Actual cost of valuation	Actual cost of valuation	
				Minimal

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
LIBRARIES				
Fines On Overdue Items				
Adults – per day	L	0.15	0.15	
Maximum charge per book	L	5.10	5.10	
Senior Citizens – per day	L	0.10	0.10	
Maximum charge per book	L	3.10	3.10	
Children – per day	L	No charge	No charge	
Loan Charges for Audio Materials (1 week)				
CD's	L	1.00	1.00	
DVD's	L	1.50	1.50	
Reservation Fees for books and Audio Materials				
Adults	L	0.50	0.50	
Senior Citizens	L	0.25	0.25	
Children/Unemployed	L	0.25	0.25	
Reservation Fees for Books Obtained from Outside the Authority				
Single charge for all books obtained from other libraries	L	6.00	6.00	
Repeat Fee for Renewal of Books from Outside the Authority				
Single Charge for all books obtained from other local authorities	L	6.00	6.00	
Replacement Tickets				
Adults	L	1.20	1.20	
Senior Citizens	L	1.20	1.20	
Children/Unemployed	L	0.60	0.60	
Spoken Word				
Cassettes & CDs (3 Week Loan)	L			
Adults (who are not exempt) each	L	1.50	1.50	
Children each	L	No charge	No charge	
Language Courses (per element)				
Subscription for whole course to be paid in advance	L	1.35	1.35	
Local History Research				
Standard charge	L	5.00	5.00	
Specialist Research – per hour	L	30.00	30.00	
Photocopies				
A4 B&W	L	0.15	0.15	
A3 B&W	L	0.30	0.30	
Printing				
Text Printouts				
A4 B&W	L	0.15	0.15	
A3 B&W	L	0.30	0.30	
Image Printouts				
A4 B&W	L	0.80	0.80	
A4 colour	L	1.60	1.60	
Reproduction of Images from Stock				
Digital copies for Private/Study purposes – per photo	L	5.50	5.50	
Digital copies for small local commercial use – per photo	L	5.50 + 2 copies of publications	5.50 + 2 copies of publications	
Digital copies for local commercial use - per photo	L	10.50 + 2 copies of book	10.50 + 2 copies of book	
Digital copies for national/international commercial	L	110.00	110.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Scan and e-mail Service				
First sheet	L	1.00	1.00	
Each subsequent sheet	L	0.50	0.50	
Hire of Locker	L	0.50	0.50	
Internet Use				
Library members First 30 minutes FREE , Members & Non Members £1.00 per 30 minutes hereafter	L	1.00	1.00	
Lost & Damaged Items	L	Full current Replacement Cost (non-refundable)	Full current Replacement Cost (non-refundable)	
Fax				
Outgoing Transmission				
United Kingdom – per sheet	L	1.45	1.45	
Europe – per sheet	L	2.30	2.30	
USA/Canada – per sheet	L	2.80	2.80	
Rest of the World – per sheet	L	3.80	3.80	
Incoming Transmission – per sheet	L	0.45	0.45	
Fax by Satellite				
Atlantic Ocean/Indian Ocean/Pacific Ocean – per sheet	L	12.50	12.50	
Room Hire				
Not for profit organisations per hour	L	10.00	10.00	
Commercial organisations per hour	L	15.00	15.00	
				NIL
PLANNING FEES				
Planning fees are set nationally				
PLANNING – PRE APPLICATION ADVICE				
All charges include VAT at 20%				
Large Major Development (200+) for a written response, including up to 2 meetings	L	1,200.00	1,200.00	
Small Major Development (10-199) for a written response, including up to 2 meetings	L	600.00	600.00	
Minor Development for a written response to include a meeting if necessary	L	400.00	400.00	
Other Developments				
Minerals Processing	L	Based on areas above	Based on areas above	
Change of use for a written response to include a meeting if necessary	L	50.00	50.00	
Householder developments	L	36.00	36.00	
Advertisements	L	25.00	25.00	
Listed Building consents (to alter/extend/demolish)	L	Free	Free	
Conservation area consents	L	Free	Free	
Certificates of lawful development	L	Application advice not appropriate	Application advice not appropriate	
Telecommunications Notifications	L	126.00	126.00	
Other Charges				
Pre-Application meeting involving Planning Committee Members	L	1,000.00	1,000.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
PLANNING – SUPPLEMENTARY ITEMS				
Items inclusive of VAT at 20%				
A4 Photocopy (ex plans) – first page	L	1.10	1.10	
Subsequent pages	L	0.10	0.10	
A3 Photocopy (ex plans) – first page	L	1.20	1.20	
Subsequent pages	L	0.20	0.20	
A2 Photocopy (ex plans) – first page	L	1.50	1.50	
A1 Photocopy (ex plans)	L	2.00	2.00	
A0 Photocopy (ex plans)	L	3.00	3.00	
Items outside the scope of VAT				
Local plan	L	18.00	18.00	
Local plan – postage	L	4.00	4.00	
Local plan – alterations	L	2.00	2.00	
Invoicing	L	9.00	9.00	
				NIL
LICENSING The following fees do not incur VAT				
Prosecution Costs				
Hourly rate for Preparation of Case Reports	L	46.00	47.00	
General Licensing				
Pavement Café Licence, per person				
1-10	L	200.00	200.00	
11-25	L	240.00	240.00	
26-40	L	280.00	280.00	
41-60	L	320.00	320.00	
61-80	L	360.00	360.00	
81-99	L	400.00	400.00	
100 or over	L	450.00	450.00	
Duplicate licence fee	L	50.00	50.00	
Transfer of licence	L	50.00	50.00	
Change of detail	L	30.00	30.00	
Variation of Covers	L	100.00	100.00	
Pavement Display Licence	L	155.00	155.00	
Sex Shop Grant of application	L	1,200.00	1,200.00	
Sex Shop Renewal	L	1,200.00	1,200.00	
Sex Shop transfer	L	1,200.00	1,200.00	
Sexual Entertainment Venue (SEV) Grant	L	1,200.00	1,200.00	
SEV Variation	L	1,200.00	1,200.00	
SEV Renewal	L	1,200.00	1,200.00	
SEV Grant / Variation / Renewal – Club Premises Certificates	L	750.00	750.00	
Skin Piercing (Premises) Grant	L	280.00	280.00	
Skin Piercing (Personal) Grant/Variation	L	65.00	65.00	
Scrap Metal Dealers				
Collectors Licence (3 years) - application	L	150.00	150.00	
Collectors Licence (3 years) – renewal	L	150.00	150.00	
Major Variation	L	50.00	50.00	
Minor Variation	L	15.00	15.00	
Site Licence (3 years) Grant	L	350.00	350.00	
Additional Sites (per site per year of licence)	L	195.00	195.00	
Site licence (3 years) – renewal	L	270.00	270.00	
Additional sites (per site per year of licence)	L	195.00	195.00	
Minor Variation Site	L	15.00	15.00	
Major Variation Site	L	50.00 + 65.00 per additional site per year	50.00 + 65.00 per additional site per year	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Caravan Sites				
New Application for a permanent residential site licence;	L			
1-5 pitches	L	200.00	200.00	
6-20 pitches	L	225.00	225.00	
21-50 pitches	L	240.00	240.00	
Greater than 50 pitches	L	260.00	260.00	
Annual Fees associated with administration and monitoring of site licences;				
1-5 pitches	L	No charge	No charge	
6-50 pitches	L	220.00	220.00	
Greater than 50 pitches	L	260.00	260.00	
Cost of Laying Site Rules	L	25.00	25.00	
Cost of Variation/Transfer	L	100.00	100.00	
Zoo Licensing Act				
New Application (4 years) or renewal (6 years) for a Zoo Licence (excluding the inspection costs of appointed inspector)	L	450.00	450.00	
Animal Welfare				
Breeding of Dogs - Grant of Licence				
1 Year Licence	L	245.00	245.00	
2 Year Licence	L	290.00	290.00	
3 Year Licence	L	335.00	335.00	
Breeding of Dogs - Renewal of Licence				
1 Year Licence	L	215.00	215.00	
2 Year Licence	L	260.00	260.00	
3 Year Licence	L	305.00	305.00	
Pet Vending Commercial - Grant of Licence				
1 Year Licence	L	252.00	252.00	
2 Year Licence	L	297.00	297.00	
3 Year Licence	L	342.00	342.00	
Pet Vending Commercial - Renewal of Licence				
1 Year Licence	L	222.00	222.00	
2 Year Licence	L	267.00	267.00	
3 Year Licence	L	312.00	312.00	
Pet Vending Home - Grant of Licence				
1 Year Licence	L	245.00	245.00	
2 Year Licence	L	290.00	290.00	
3 Year Licence	L	335.00	335.00	
Pet Vending Home - Renewal of Licence				
1 Year Licence	L	215.00	215.00	
2 Year Licence	L	260.00	260.00	
3 Year Licence	L	305.00	305.00	
Keeping or Training Animals for Exhibition - Grant of Licence				
3 Year Licence	L	235.00	235.00	
Keeping or Training Animals for Exhibition - Renewal of Licence				
3 Year Licence	L	215.00	215.00	
Hiring Out of Horses - Grant of Licence				
1 Year Licence	L	265.00	265.00	
2 Year Licence	L	310.00	310.00	
3 Year Licence	L	355.00	355.00	
Hiring Out of Horses - Renewal of Licence				
1 Year Licence	L	235.00	235.00	
2 Year Licence	L	280.00	280.00	
3 Year Licence	L	325.00	325.00	
Boarding of Dogs and Cats Commercial - Grant of Licence				
1 Year Licence	L	305.00	305.00	
2 Year Licence	L	350.00	350.00	
3 Year Licence	L	395.00	395.00	
Boarding of Dogs and Cats Commercial - Renewal of Licence				
1 Year Licence	L	275.00	275.00	
2 Year Licence	L	320.00	320.00	
3 Year Licence	L	365.00	365.00	
Boarding of Dogs and Cats Home - Grant of Licence				
1 Year Licence	L	245.00	245.00	
2 Year Licence	L	290.00	290.00	
3 Year Licence	L	335.00	335.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Boarding of Dogs and Cats Home - Renewal of Licence				
1 Year Licence	L	215.00	215.00	
2 Year Licence	L	260.00	260.00	
3 Year Licence	L	305.00	305.00	
Boarding of Dogs Day Care Up to 7 Dogs - Grant of Licence				
1 Year Licence	L	245.00	245.00	
2 Year Licence	L	290.00	290.00	
3 Year Licence	L	335.00	335.00	
Boarding of Dogs Day Care Up to 7 Dogs - Renewal of Licence				
1 Year Licence	L	215.00	215.00	
2 Year Licence	L	260.00	260.00	
3 Year Licence	L	305.00	305.00	
Boarding of Dogs Day Care 8+ Dogs - Grant of Licence				
1 Year Licence	L	305.00	305.00	
2 Year Licence	L	350.00	350.00	
3 Year Licence	L	395.00	395.00	
Boarding of Dogs Day Care 8+ Dogs - Renewal of Licence				
1 Year Licence	L	275.00	275.00	
2 Year Licence	L	320.00	320.00	
3 Year Licence	L	365.00	365.00	
Dog Boarding Franchise in Darlington - Grant of Licence	L	130.00 + 10.00 per host + 65.00 per host inspection fee + 45.00 annual enforcement fee per year	130.00 + 10.00 per host + 65.00 per host inspection fee + 45.00 annual enforcement fee per year	
Dog Boarding Franchise in Darlington - Renewal of Licence	L	100.00 + 10.00 per host + 60.00 per host inspection fee + 45.00 annual enforcement fee per year	100.00 + 10.00 per host + 60.00 per host inspection fee + 45.00 annual enforcement fee per year	
Dog Boarding Franchise out of Darlington - Grant of Licence	L	60.00 + 65.00 per host	60.00 + 65.00 per host	
Dog Boarding Franchise out of Darlington - Renewal of Licence	L	55.00 + 60.00 per host	55.00 + 60.00 per host	
Additional Fees				
Cost per additional licensable activity - Grant and Renewal (each)	L	65.00	65.00	
Mandatory mid licence inspection fee - Grant and Renewal (each)	L	30.00	30.00	
Variation of licence where no inspection is required (each)	L	35.00	35.00	
Variation of licence where inspection is required (each)	L	90.00	90.00	
Application for Re-Rating (each)	L	70.00	70.00	
Copy Licence	L	15.00	15.00	
Administration Fee	L	35.00	35.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Street Trading				
November / December - Full Calendar Month	L	975.00	975.00	
- Week	L	385.00	385.00	
- Day	L	85.00	85.00	
January / October - Full Calendar Month	L	660.00	660.00	
- Week	L	270.00	270.00	
- Day	L	60.00	60.00	
Note- The above to apply to Itinerant traders. For regular all year round traders - fees as follows				
Annual Consent	L	7,000.00	7,000.00	
If Paying Monthly	L	620.00	620.00	
If Paying Weekly	L	170.00	170.00	
Buskers selling CD's – Half Day	L	25.00	25.00	
Full Day	L	45.00	45.00	
Mobile vehicles (moving or lay-by)	L	260.00	260.00	
New Vendor Permits	L	35.00	35.00	
Duplicate licenses	L	15.00	15.00	
Skip Hire Licence				
More than 3 days' notice	L	15.00	15.00	
Less than 3 days' notice	L	30.00	30.00	
Hoarding/Scaffold Licence	L	50.00	50.00	
Administration Charge (per hour or part thereof)	L	35.00	35.00	
Statutory Fees				
Petroleum Licences				
Less than 2,500 litres	L	41.00	41.00	
2,500 – 50,000 litres	L	57.00	57.00	
More than 50,000 litres	L	118.00	118.00	
Transfer/variation	L	8.00	8.00	
Gambling Act				
Statutory Fees- The following gambling fees are set within statutory bands and will be revised as changed nationally.				
Adult Gaming Centres – Annual Fee	N	600.00	600.00	
New Application	N	1,300.00	1,300.00	
Variation	N	1,300.00	1,300.00	
Transfer	N	1,200.00	1,200.00	
Provisional Statement	N	1,300.00	1,300.00	
Licence Reinstatement	N	1,200.00	1,200.00	
Betting Shops - Annual Fee	N	550.00	550.00	
New Application	N	1,300.00	1,300.00	
Variation	N	1,300.00	1,300.00	
Transfer	N	1,200.00	1,200.00	
Provisional Statement	N	1,300.00	1,300.00	
Licence Reinstatement	N	1,300.00	1,300.00	
Bingo Halls - Annual Fee	N	600.00	600.00	
New Application	N	1,300.00	1,300.00	
Variation	N	1,300.00	1,300.00	
Transfer	N	1,200.00	1,200.00	
Provisional Statement	N	1,300.00	1,300.00	
Licence Reinstatement	N	1,200.00	1,200.00	
Family Entertainment Centres – Annual Fee	N	550.00	550.00	
New Application	N	1,300.00	1,300.00	
Variation	N	1,300.00	1,300.00	
Transfer	N	950.00	950.00	
Provisional Statement	N	1,300.00	1,300.00	
Licence Reinstatement	N	950.00	950.00	
Betting (tracks) – Annual Fee	N	550.00	550.00	
New Application	N	1,300.00	1,300.00	
Variation	N	1,300.00	1,300.00	
Transfer	N	950.00	950.00	
Provisional Statement	N	1,300.00	1,300.00	
Licence Reinstatement	N	950.00	950.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Permit Type – The following fees are set by statute and will be revised as changed nationally				
Small Society Lottery Registration	N	40.00	40.00	
Small Society Annual Fee	N	20.00	20.00	
FEC gaming machine – Renewal fee	N	300.00	300.00	
FEC gaming machine – Change of name	N	25.00	25.00	
Prize gaming – Application fee	N	300.00	300.00	
Prize gaming – Renewal fee	N	300.00	300.00	
Prize gaming – Change of name	N	25.00	25.00	
Prize gaming – Copy permit	N	15.00	15.00	
Gaming machines (3 or more) - application Fee	N	100.00	100.00	
Gaming machines (3 or more) - variation Fee	N	100.00	100.00	
Gaming machines (3 or more) - transfer Fee	N	25.00	25.00	
Gaming machines (3 or more) - annual Fee	N	50.00	50.00	
Change of name	N	25.00	25.00	
Copy Permit	N	15.00	15.00	
Notice of intent 2 or less gaming machines available	N	50.00	50.00	
Club Premises cert (S 72f Licencing Act 2003) application fee	N	100.00	100.00	
Club Premises cert (S 72f Licencing Act 2003) renewal fee	N	100.00	100.00	
Other applicants - application fee	N	200.00	200.00	
Other applicants - renewal fee	N	200.00	200.00	
Variation fee	N	100.00	100.00	
Annual fee	N	50.00	50.00	
Copy permit	N	15.00	15.00	
Initial fee	N	40.00	40.00	
Annual fee	N	20.00	20.00	
Temporary use notice	N	500.00	500.00	
Copy/replacement/endorsed copy of notice	N	25.00	25.00	
Licensing Act Fees				
Statutory Fees- The following gambling fees are set within statutory bands and will be revised as changed nationally.				
Premises Licences				
Band A (RV £0 - £4,300) - Initial fee	N	100.00	100.00	
- Annual fee	N	70.00	70.00	
Band B (RV £4,301 - £33,000) - Initial fee	N	190.00	190.00	
- Annual fee	N	180.00	180.00	
Band C (RV £33,001 - £87,000) - Initial fee	N	315.00	315.00	
- Annual fee	N	295.00	295.00	
Band D (RV £87,001 - £125,000) - Initial fee	N	450.00	450.00	
- Annual fee	N	320.00	320.00	
Band E (RV > £125,001) - Initial fee	N	635.00	635.00	
- Annual fee	N	350.00	350.00	
Band D with Multiplier - Initial fee	N	900.00	900.00	
- Annual fee	N	640.00	640.00	
Band E with Multiplier - Initial fee	N	1,905.00	1,905.00	
- Annual fee	N	1,050.00	1,050.00	
Club Premises Certificates				
Band A (RV £0 - £4,300) - Initial fee	N	100.00	100.00	
- Annual fee	N	70.00	70.00	
Band B (RV £4,301 - £33,000) - Initial fee	N	190.00	190.00	
- Annual fee	N	180.00	180.00	
Band C (RV £33,001 - £87,000) - Initial fee	N	315.00	315.00	
- Annual fee	N	295.00	295.00	
Band D (RV £87,001 - £125,000) - Initial fee	N	450.00	450.00	
- Annual fee	N	320.00	320.00	
Band E (RV > £125,001) - Initial fee	N	635.00	635.00	
- Annual fee	N	350.00	350.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Large Scale Events				
5,000 to 9,999 - Initial fee	N	1,000.00	1,000.00	
- Annual fee	N	500.00	500.00	
10,000 to 14,999 - Initial fee	N	2,000.00	2,000.00	
- Annual fee	N	1,000.00	1,000.00	
15,000 to 19,999 - Initial fee	N	4,000.00	4,000.00	
- Annual fee	N	2,000.00	2,000.00	
20,000 to 29,999 - Initial fee	N	8,000.00	8,000.00	
- Annual fee	N	4,000.00	4,000.00	
30,000 to 39,999 - Initial fee	N	16,000.00	16,000.00	
- Annual fee	N	8,000.00	8,000.00	
40,000 to 49,999 - Initial fee	N	24,000.00	24,000.00	
- Annual fee	N	12,000.00	12,000.00	
50,000 to 59,999 - Initial fee	N	32,000.00	32,000.00	
- Annual fee	N	16,000.00	16,000.00	
60,000 to 69,999 - Initial fee	N	40,000.00	40,000.00	
- Annual fee	N	20,000.00	20,000.00	
70,000 to 79,999 - Initial fee	N	48,000.00	48,000.00	
- Annual fee	N	24,000.00	24,000.00	
80,000 to 89,999 - Initial fee	N	56,000.00	56,000.00	
- Annual fee	N	28,000.00	28,000.00	
> 90,000 - Initial fee	N	64,000.00	64,000.00	
- Annual fee	N	32,000.00	32,000.00	
Other Licensing Act 2003 Fees & Charges				
Minor Variations	N	89.00	89.00	
Personal Licence	N	37.00	37.00	
Provisional Statement	N	315.00	315.00	
Temporary Event Notice (TEN)	N	21.00	21.00	
Theft / Loss of Licence / Notice	N	10.50	10.50	
Variation of DPS	N	23.00	23.00	
Transfer of Premises Licence	N	23.00	23.00	
Change of Name / Address	N	10.50	10.50	
Notification of Interest	N	21.00	21.00	
Notification of Alteration of Club Rules	N	10.50	10.50	
Interim Authority Notice	N	23.00	23.00	
Explosives Act/Fireworks Annual Registration	N	52.00	52.00	
				NIL

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
HACKNEY CARRIAGES				
Taxi Licencing				
Taxi licensing fees are agreed annually by licensing committee normally in March and will be published separately as part of this process. Existing licence holders will be notified accordingly.				
ENVIRONMENTAL HEALTH				
Pest Treatment Charges – All charges shown exclusive of VAT. Charges will be made plus the appropriate VAT rate				
Insects – per Treatment	L	58.50	58.50	
Rodents in Private Premises	L	8.33	8.33	
Re-rating Food Hygiene Inspections	L	150.00	150.00	
Prosecution Costs				
Hourly Rate for preparation of case reports and carrying out works in default of legal notices	L	46.00	47.00	
Environmental Searches				
Environmental search 1 or 2 report includes environmental information held by the Council on a site (additional charges apply for sites larger than 10,000m2 and distance buffer greater than 250m radius)	L	65.00	65.00	
Additional photocopying for example copies of site investigation reports;				
A4 B&W	L	0.10	0.10	
A3 B&W	L	0.20	0.20	
A4 Colour	L	1.00	1.00	
A3 Colour	L	2.00	2.00	
Scanned Copy	L	Free	Free	
LAPPC and LAIPPC Permits				
Charges are annually set by Defra in March and are subject to change. Current charges as known are;				
LAPPC Charges				
Application Fee;				
Standard process (includes solvent emission activities)	N	1,650.00	1,650.00	
Additional fee for operating without a permit	N	1,188.00	1,188.00	
PVRI, SWOBs and Dry Cleaners	N	155.00	155.00	
PVR I & II combined	N	257.00	257.00	
VRs and other Reduced Fee Activities	N	362.00	362.00	
Reduced fee activities: additional fee for operating without a permit	N	71.00	71.00	
Mobile plant**	N	1,650.00	1,650.00	
for the third to seventh applications	N	985.00	985.00	
for the eighth and subsequent applications	N	498.00	498.00	
Where an application for any of the above is for a combined Part B and waste application add an extra to the above amounts	N	310.00	310.00	
Annual Subsistence Charge;				
Standard process Low*	N	772.00 (+104.00)	772.00 (+104.00)	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Standard process Medium*	N	1,161.00 (+156.00)	1,161.00 (+156.00)	
Standard process High*	N	1,747.00 (+207.00)	1,747.00 (+207.00)	
*the additional amounts must be charged where a permit is for a combined Part B and waste installation				
PVRI, SWOBs and Dry Cleaners Low	N	79.00	79.00	
PVRI, SWOBs and Dry Cleaners Medium	N	158.00	158.00	
PVRI, SWOBs and Dry Cleaners High	N	237.00	237.00	
PVR I & II combined Low	N	113.00	113.00	
PVR I & II combined Medium	N	226.00	226.00	
PVR I & II combined High	N	341.00	341.00	
VRs and other Reduced Fees Low	N	228.00	228.00	
VRs and other Reduced Fees Medium	N	365.00	365.00	
VRs and other Reduced Fees High	N	548.00	548.00	
Mobile plant, for the first and second permits Low**	N	626.00	626.00	
for the third to seventh permits Low	N	385.00	385.00	
eighth and subsequent permits Low	N	198.00	198.00	
Mobile plant, for the first and second permits Medium**	N	1,034.00	1,034.00	
for the third to seventh permits Medium	N	617.00	617.00	
eighth and subsequent permits Medium	N	316.00	316.00	
Mobile plant, for the first and second permits High**	N	1,551.00	1,551.00	
for the third to seventh permits High	N	924.00	924.00	
eighth and subsequent permits High	N	473.00	473.00	
Late payment fee	N	52.00	52.00	
Where a Part B installation is subject to reporting under the E-PRTR Regulation add an extra to the above amounts	N	104.00	104.00	
Transfer and Surrender;				
Standard process transfer	N	169.00	169.00	
Standard process partial transfer	N	497.00	497.00	
New operator at low risk reduced fee activity	N	78.00	78.00	
Surrender: all Part b activities	N	0.00	0.00	
Reduced fee activities: transfer	N	0.00	0.00	
Reduced fee activities: partial transfer	N	47.00	47.00	
Temporary transfer for mobiles;				
First transfer	N	53.00	53.00	
Repeat following enforcement or warning	N	53.00	53.00	
Substantial change;				
Standard process	N	1,050.00	1,050.00	
Standard process where the substantial change results in a new PPC activity	N	1,650.00	1,650.00	
Reduced fee activities	N	102.00	102.00	
**Not using simplified permits				
LAPPC mobile plant charges (not using simplified permits)				
Number of permits 1 to 2;				
Application fee	N	1,650.00	1,650.00	
Subsistence fee Low	N	646.00	646.00	
Subsistence fee Medium	N	1,034.00	1,034.00	
Subsistence fee High	N	1,506.00	1,506.00	
Number of permits 3 to 7;				
Application fee	N	985.00	985.00	
Subsistence fee Low	N	385.00	385.00	
Subsistence fee Medium	N	617.00	617.00	
Subsistence fee High	N	924.00	924.00	
Number of permits 8 and over;				
Application fee	N	498.00	498.00	
Subsistence fee Low	N	198.00	198.00	
Subsistence fee Medium	N	316.00	316.00	
Subsistence fee High	N	473.00	473.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
LA-IPPC charges				
Every subsistence charge below includes the additional £104 charge to cover LA extra costs in dealing with reporting under the E-PRTR Regulation				
Application	N	3,363.00	3,363.00	
Additional fee for operating without a permit	N	1,188.00	1,188.00	
Annual Subsistence Low	N	1,447.00	1,447.00	
Annual Subsistence Medium	N	1,611.00	1,611.00	
Annual Subsistence High	N	2,334.00	2,334.00	
Late Payment Fee	N	52.00	52.00	
Variation	N	1,368.00	1,368.00	
Transfer	N	235.00	235.00	
Partial Transfer	N	698.00	698.00	
Surrender	N	698.00	698.00	
Subsistence charges can be paid in four equal quarterly instalments paid on 1st April, 1st July, 1st October and 1st January. Where paid quarterly the total amount payable to the local authority will be increased by £38.00				
Newspaper adverts may be required under EPR at the discretion of the LA as part of the consultation process when considering an application. This will be undertaken and paid for by the LA and the charging scheme contains a provision for the LA to recoup its costs				**Minimal**
TRADING STANDARDS Please note that VAT may be added to some charges. Check with the service before the work is agreed.				
Prosecution Costs				
Hourly rate for Preparation of Case Reports	L	46.00	47.00	
Measures				
Linear measures not exceeding 3m each scale	L	14.00	14.50	
Not exceeding 15kg	L	39.00	40.00	
Exceeding 15kg but not exceeding 100kg	L	59.50	60.50	
Exceeding 100kg but not exceeding 250kg	L	82.00	83.50	
Exceeding 250kg but not exceeding 1 tonne	L	142.50	145.50	
Exceeding 1 tonne but not exceeding 10 tonnes	L	228.50	233.00	
Exceeding 10 tonnes but not exceeding 30 tonnes	L	479.00	488.50	
Exceeding 30 tonnes but not exceeding 60 tonnes	L	712.00	726.00	
Charge to cover any additional costs involved in testing incorporating remote display or printing facilities based on the above fee plus a charge per hour (minimum charge of 2 hours)	L	62.52 per hour	63.77 per hour	
Measuring Instruments for Intoxicating Liquor				
Not exceeding 150ml	L	22.50	23.00	
Other	L	26.00	26.50	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Measuring Instruments for Liquid Fuels and Lubricants				
Container Type (un-subdivided)				
Multi-grade (with price computing device):	L	98.50	100.50	
Single Outlets	L	135.50	138.00	
Solely Price Adjustment	L	247.50	252.50	
Otherwise				
Other Types – Single Outlets				
Solely Price Adjustment	L	108.50	110.50	
Otherwise	L	147.50	150.50	
Other Types – Multi Outlets:				
1 Meter Tested	L	158.00	161.00	
2 Meters Tested	L	259.00	264.00	
3 Meters Tested	L	353.50	360.50	
4 Meters Tested	L	450.50	459.50	
5 Meters Tested	L	545.00	556.00	
6 Meters Tested	L	639.50	652.50	
7 Meters Tested	L	722.50	737.00	
8 Meters Tested	L	835.50	852.00	
Charge to cover any additional costs involved in testing ancillary equipment such as payment acceptors based on the above fee plus a charge per hour (minimum of 2 hours)	L	62.52 per hour	63.77 per hour	
Special Weighing and Measuring Equipment				
For all specialist work undertaken by the service which is not included above a charge per hour on site (minimum charge of 2 hours) plus cost of provision of testing equipment applies	L	62.52 per hour	63.77 per hour	
Discounts Fees from Measures to Certification Calibration will be discounted as follows :- a) Where more than a single item is submitted on one occasion the second and subsequent fees will be reduced by 20% b) Where tests are undertaken using appropriately certified weights and equipment not supplied by the Borough Council the fees will be reduced by 20% c) Special rates can be negotiated for multiple submissions or where assistance with equipment or labour is provided NB – Where different fees are involved the highest fee will be charged in full and any discounts calculated from the remaining lesser fees				
Licensing – VAT not applicable				
Explosives and Fireworks Licences (Statutory Fee)				
Licence for the storage of explosives	N	**See Note	**See Note	
Licence for the sale of fireworks all year round	N	**See Note	**See Note	
**These are statutory rates that are set centrally in April				
				Minimal

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
PARKING – all off-street charges are inclusive of VAT at 20% The below pricing reflects the parking offers approved by Cabinet in October 2019 and apply until 1 May 2020 when they will be reviewed and as such charges may be subject to change				
Car Parks (Short Stay) – per hour				
Abbotts Yard	L	1.00	1.00	
Commercial Street East & West	L	1.00	1.00	
Feethams Multi Storey Car Park	L	1.00	1.00	
Winston Street North & South	L	1.00	1.00	
Car Parks – Mixed Charges				
Archer Street, Garden Street, Kendrew Street East & West, Hird Street, St Hilda's & Park Place East & West				
First 2 hours	L	Free	Free	
3 hours	L	1.00	1.00	
Per day	L	4.00	4.00	
Per week	L	16.00	16.00	
East Street				
Per hour	L	1.00	1.00	
Per day	L	2.00	2.00	
Car Parks – Long Stay				
Chestnut Street				
Cars first 2 hours	L	Free	Free	
Cars 3 hours	L	1.00	1.00	
Cars per day	L	2.00	2.00	
Cars per week	L	8.00	8.00	
HGV/coach per day	L	Free	Free	
HGV/coach per night (6pm-8am)	L	4.00	4.00	
Park Lane				
Per day	L	5.00	5.00	
Central House				
Saturday all day	L	4.00	4.00	
Bank Holiday all day	L	4.00	4.00	
All Car Parks				
Sunday all day	L	Free	Free	
On Street Parking (up to 2 hours no return within 1 hour EXCEPT for Grange Road & Northumberland Street up to 3 hours no return within 1 hour and East Row 30 minutes maximum no return within 1 hour)				
Per 30 mins	L	0.50	0.50	
Sunday all day	L	Free	Free	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Car Parks – Contract Parking – all charges are inclusive of VAT at 20%				
Parking locations as determined by the Director of Economic Growth and Neighbourhood Services.				
Per year one space	L	950.00	950.00	
Per year two spaces	L	900.00	900.00	
Per year three spaces	L	860.00	860.00	
Per year four spaces	L	830.00	830.00	
Per year five to nine spaces	L	800.00	800.00	
Per year ten or more spaces	L	700.00	700.00	
Four Riggs				
Per calendar month	L	64.00	64.00	
Winston Street West				
Per space per year	L	1,100.00	1,100.00	
Car Parks – Staff & Members per year	L	173.04	173.04	
Residents Parking Permits				
3 month temporary permit	L	12.00	12.00	
6 month permit	L	24.00	24.00	
12 month permit	L	40.00	40.00	
Tradesmen Parking Permits				
Daily Waiver	L	5.00	5.00	
3 month permit	L	50.00	50.00	
6 month permit	L	90.00	90.00	
12 month permit	L	150.00	150.00	
				NIL
BUILDING CONTROL				
Items inclusive of VAT at 20%				
Letter confirming exemption	L	Free	Free	
Letter confirming enforcement action will not be taken	L	Free	Free	
Decision/Approval Notice (Building Control)				
Responding to request for historical information from electronic databases (email response)	L	Free	Free	
Responding to request for historical information from electronic databases (letter response)	L	1.00	1.00	
Responding to request for historical information from manually recorded data (email response)	L	Free	Free	
Personal searches (email response)	L	Free	Free	
The Building (Local Authority Charges) Regulations 2010 Plus VAT at 20%				
Work charged on individual job basis	L	As agreed with client	As agreed with client	
				NIL

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
DOLPHIN CENTRE				
Pricing based on the introduction of a leisure card.				
Swimming				
Adult swim				
Card holder	L	3.75	3.85	
Non card holder	L	4.30	4.45	
Concession	L	2.85	2.95	
Junior Swim	L	2.55	2.65	
Concession	L	1.90	2.00	
Family swim junior rate discount				
(up to 4 children accompanying 1 adult)				
Per card holder	L	1.90	2.00	
Per non card holder	L	2.20	2.30	
Under 5 years	L	1.10	1.20	
Under 12 months	L	Free	Free	
Lessons	L	46.50	47.50	
Fitness Areas				
The Gym				
Card holder	L	4.55	4.65	
Non card holder	L	5.25	5.35	
Concession	L	3.40	3.50	
Junior Gym	L	3.70	3.80	
Concession	L	2.80	2.90	
Health & Fitness Classes				
Health & Fitness Classes				
Card holder	L	3.95	4.05	
Non card holder	L	4.55	4.65	
Concession	L	2.95	3.05	
Multi Activity Sessions				
Badminton Daytime Session				
Card holder	L	2.60	2.80	
Non card holder	L	3.00	3.20	
Half Main Hall				
Adult				
Card holder	L	43.50	43.50	
Non card holder	L	50.00	50.00	
Junior (1 hour courts only)	L	30.00	30.00	
Weekday lunchtime				
Card holder	L	38.00	38.00	
Non card holder	L	42.00	42.00	
Badminton				
Adult				
Card holder	L	7.90	8.10	
Non card holder	L	9.10	9.30	
Concession	L	5.95	6.10	
Junior (1 hour courts only)	L	4.25	4.45	
Concession (1 hour courts only)	L	3.20	3.35	
Squash Courts				
Adult				
Card holder	L	6.90	6.90	
Non card holder	L	7.95	7.95	
Concession	L	5.20	5.20	
Junior (up to 5pm on weekdays only)	L	3.55	3.55	
Concession (up to 5pm on weekdays only)	L	2.65	2.65	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Equipment Hire				
Footballs	L	Free	Free	
Footballs – Deposit (FOC for card holders)	L	5.00	5.00	
Badminton	L	2.00	2.00	
Badminton – Deposit (FOC for card holders)	L	5.00	5.00	
Squash Racquets	L	2.00	2.00	
Squash Racquets – Deposit (FOC for card holders)	L	5.00	5.00	
Table Tennis Bats	L	1.40	1.40	
Table Tennis Bats – Deposit (FOC for card holders)	L	5.00	5.00	
Pram Lock	L	Free	Free	
Pram Lock – Deposit (FOC for card holders)	L	5.00	5.00	
Children's Activities				
Crèche	L	3.40	3.55	
Soft play admissions	L	3.70	3.85	
Sensory Room	L	3.70	3.85	
Parent/toddler (Soft play)	L	3.70	3.85	
Other Activities				
Showers				
Card holders	L	1.85	1.95	
Non card holders	L	2.10	2.25	
Fit 4 Life Packages				
12 month Full Membership	L	299.40	299.40	
12 month Seniors	L	228.00	228.00	
12 month Student	L	180.00	180.00	
6 Month Full	L	195.00	195.00	
12 Month Upfront	L	275.00	275.00	
Swimming Pools				
Main Pool - per hour	L	89.00	92.00	
Diving Pool - per hour	L	50.00	52.00	
Teaching Pool - per hour	L	50.00	52.00	
Gala - per hour				
Swimming Galas - whole complex				
Normal opening hours - per hour	L	284.00	293.00	
Outside normal opening hours - per hour	L	150.00	155.00	
Swimming Galas - Schools, Junior Clubs and Organisations				
Main Pool - Peak	L	200.00	206.00	
Main Pool - Off Peak	L	139.00	145.00	
Main Pool and Teaching Pool - Peak	L	167.00	172.00	
Main Pool and Teaching Pool - Off Peak	L	172.00	177.00	
Electronic Timing	L	83.00	86.00	
Dry Sports Hall				
Main Sports Hall - per hour	L	94.00	97.00	
Special Events - per hour Weekends	L	309.00	318.00	
Preparation - per hour Weekends	L	161.00	166.00	
Special Events - Schools - per hour off peak	L	44.00	44.50	
Meeting Room	L	32.00	33.00	
Seminar Room/Stephenson Suite	L	32.00	33.00	
Central Hall				
All Events (except commercial, exhibitions and local societies)	L	98.00	101.00	
Exhibitions - commercial - per hour	L	128.00	132.00	
Local Societies event - per hour	L	67.00	69.00	
				20,000
PARKS				
Bowls Season Ticket	L	37.00	38.00	
Concession	L	28.00	29.00	
Football - Hire of Hundens Park Pitch Seniors' Match	L	36.00	37.00	
Juniors Match	L	20.00	21.00	
				Minimal

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
EASTBOURNE SPORTS COMPLEX				
3G Pitch				
Non Charter Standard Pay and Play (No VAT)				
3G 1/3 per hour – Adult	L	46.00	46.00	
3G 1/3 per hour – Junior	L	29.00	29.00	
3G Full pitch per hour – Adult	L	77.00	77.00	
3G Full pitch per hour – Junior	L	50.00	50.00	
Charter Standard and Partner Clubs (No VAT)				
3G 1/3 hour	L	36.00	36.00	
3G Full pitch hour	L	52.00	52.00	
Partner Club Rate Fridays 3G Full pitch hour	L	31.00	31.00	
Off Peak Summer Prices (May to August) Charter Standard and Partner Clubs Only				
3G 1/3 hour	L	15.50	15.50	
3G Full pitch hour	L	26.00	26.00	
Grass Pitch				
Adult per match	L	37.00	37.00	
Junior per match	L	19.00	19.00	
Athletics Track				
Non club rate				
Adult	L	3.60	3.70	
Junior	L	3.20	3.30	
Full track per hour	L	32.00	33.00	
Club rate				
Adult	L	3.00	3.10	
Junior	L	3.00	3.10	
Gym				
Adult	L	4.20	4.30	
Cardiac Concession	L	2.20	2.30	
Junior	L	2.00	2.10	
Adult induction	L	10.50	10.80	
Junior Induction	L	8.00	8.20	
Personal training per hour	L	20.00	20.60	
3 months membership	L	60.00	60.00	
12 month full upfront membership	L	150.00	150.00	
12 month direct debit membership per month	L	15.00	15.00	
Other				
Shower	L	1.80	1.90	
Function room and pavilion hire per hour	L	20.00	20.60	
				Minimal

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
HIPPODROME & HULLABALOO				
Hire & Conferencing (all pricing exclusive of VAT)				
John Wade Group Lounge - max capacity 40 (theatre style) - per hour	L	40.00	44.00	
John Wade Group Lounge - max capacity 40 (theatre style) - day hire**	L	240.00	265.00	
Living Water Tower Room - max capacity 18 - per hour	L	30.00	33.00	
Living Water Tower Room - max capacity 18 - day hire**	L	200.00	220.50	
Hippo Lounge - max capacity 70 - per hour	L	40.00	44.00	
Hippo Lounge - max capacity 70 - day hire**	L	240.00	265.00	
Hippo Education Space - max capacity 40 (workshop of approx. 25) - per hour	L	40.00	44.00	
Hippo Education Space - max capacity 40 (workshop of approx. 25) - day hire**	L	240.00	265.00	
Hullabaloo Rehearsal Space - max capacity 35 - per hour	L	40.00	44.00	
Hullabaloo Rehearsal Space - max capacity 35 - day hire**	L	240.00	265.00	
Hullabaloo Café - max capacity 70 - per hour	L	40.00	44.00	
Hullabaloo Café - max capacity 70 - day hire**	L	240.00	265.00	
Hippodrome Theatre Hire - max capacity 1,000 - w/end full day	L	1,500.00	1,654.00	
Hippodrome Theatre Hire - max capacity 1,000 - w/end half day	L	750.00	827.00	
Hippodrome Theatre Hire - max capacity 1,000 - w/day full day	L	1,250.00	1,378.00	
Hippodrome Theatre Hire - max capacity 1,000 - w/day half day	L	650.00	717.00	
Hullabaloo Theatre Hire - max capacity 150 - per hour	L	60.00	66.00	
Hullabaloo Theatre Hire - max capacity 150 - day hire**	L	360.00	397.00	
**day hire - 9am to 6pm				
				4,000
CATTLE MARKET				
Tolls				
Cattle	L	13.30	13.30	
Sheep, pigs, calves	L	4.35	4.35	
Levies				
Cattle	L	10.64	10.64	
Sheep, pigs, calves	L	3.48	3.48	
Rent	L	4,000.00	4,000.00	
				NIL

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
HEAD OF STEAM				
Admission				
Adult	L	4.95	4.95	
Concession	L	3.75	3.75	
Children (6-16 years old)	L	3.00	3.00	
Children (under 6)	L	No charge	No charge	
Single annual pass	L	10.00	10.00	
Family day pass (2 adults & 4 children)	L	10.00	10.00	
Family annual pass (2 adults & 4 children)	L	15.00	15.00	
School Visit	L	No charge	No charge	
Research				
Research	L	£30.00 (min 1 hour & max 3 hours)	£30.00 (min 1 hour & max 3 hours)	
Research by Curator	L	£30.00 (min 1 hour & max 3 hours)	£30.00 (min 1 hour & max 3 hours)	
Short research (up to 10 mins)	L	Free except for £5.00 minimum handling fee for scans, photocopies and postage	Free except for £5.00 minimum handling fee for scans, photocopies and postage	
Photocopying				
A4 (B&W)	L	0.20	0.20	
A3 (B&W)	L	0.40	0.40	
A4 (B&W)	L	0.50	0.50	
A3 (Colour)	L	1.00	1.00	
A0 plan copies (B&W)	L	6.50	6.50	
Digital Copies (personal) per image				
Scan of document (max A3)	L	Free except for £5.00 minimum handling fee for scans	Free except for £5.00 minimum handling fee for scans	
Scan of photograph (max A3)	L	6.50	6.50	
Day photo pass	L	10.00	10.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Digital Copies (commercial) per image				
Small local charitable, educational including websites	L	6.50	6.50	
Local commercial including websites	L	15.00	15.00	
Books, specialist magazines, journals & newspapers including websites	L	30.00	30.00	
Regional TV/Video/Film/DVD	L	50.00	50.00	
National/international TV/Video/Film/DVD	L	100.00	100.00	
Discount for 10 images or more	L	0.10	0.10	
Postage and Packing				
Up to A4 (in UK only)	L	Free except for 5.00 minimum handling fee	Free except for 5.00 minimum handling fee	
'Package' size and/or outside UK delivery	L	Dependant on size and weight	Dependant on size and weight	
Filming Fees				
Student Production (during opening hours)	L	Free but donation welcome	Free but donation welcome	
Small Productions (per day)	L	350.00	350.00	
Large Productions (per day)	L	700.00	700.00	
Conference Facilities				
During opening hours (per hour)	L	25.00	25.00	
Outside opening hours (per hour)	L	32.50	32.50	
Use by Museum partners (during opening hours)	L	Free	Free	
Hire of Museum Field				
Educational Use	L	No charge	No charge	
Corporate Events	L	Negotiated on an individual basis	Negotiated on an individual basis	
				NIL
REFUSE COLLECTION AND DISPOSAL				
Refuse sacks (per 25) (Exclusive of VAT)	L	99.35	102.35	
Bulky Household Collection up to 6 items	L	17.70	18.25	
Garden waste sacks (Non-Vatable)	L	10.60	10.90	
Cost of replacement (inclusive of 20% VAT)				
360L Wheeled Bin	L	50.30	51.80	
240L Wheeled Bin	L	19.80	20.40	
Caddie	L	5.10	5.25	
Glass Box	L	3.25	3.35	
55L Box	L	1.60	1.65	
Lid for recycling box	L	1.35	1.40	
Lid for 240 bin	L	4.95	5.10	
				2,500

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
CEMETERIES				
Burial fees without exclusive right of burial (these fees will be tripled where the deceased is a non-resident of Darlington at time of death)				
Individual foetal remains	N	No Charge	No Charge	
Stillborn or child not exceeding 12 months	N	No Charge	No Charge	
Person over 12 months up to 18 years	N	No Charge	No Charge	
Person over 18 years	L	825.00	900.00	
Burial fees with exclusive right of burial (these fees will be doubled where the deceased is a non-resident of Darlington at time of death)				
Individual foetal remains	N	No Charge	No Charge	
Child not exceeding 12 months	N	No Charge	No Charge	
Person over 12 months up to 18 years	N	No Charge	No Charge	
Person over 18 years	L	825.00	900.00	
Cremated remains	L	200.00	200.00	
Exclusive rights of burial (these fees will be doubled if the purchaser is a non-resident of Darlington if not purchased at time of first interment).				
Exclusive burial rights (50 years)	L	900.00	900.00	
Exclusive burial rights for a bricked grave	L	1,800.00	1,800.00	
Other charges				
Scattering of cremated remains	L	45.00	45.00	
Indemnity form (to produce duplicate grant	L	45.00	45.00	
Use of Cemetery Chapel	L	100.00	100.00	
After post mortem remains	L	200.00	200.00	
Evergreens (including grass mats)	L	65.00	65.00	
Exhumation of a body (excl. re-interment)	L	2,000.00	2,000.00	
Exhumation of cremated remains (excl. re-interment)	L	500.00	500.00	
Grave Maintenance (inclusive of 20% VAT)				
Initial payment	L	50.00	50.00	
Annual Maintenance	L	36.00	36.00	
Memorials (fees will be doubled where the deceased to whom the memorial/inscription refers was non-resident of Darlington at time of death)				
Memorial rights including first inscription (30 years)	L	220.00	220.00	
Provision of kerbs – traditional sites only)	L	100.00	100.00	
Vases not exceeding 300mm	L	80.00	80.00	
Additional inscription	L	80.00	80.00	
Total financial effect for Cemeteries				**9,000**

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
CREMATORIUM				
Crematorium fees (inclusive of certificate of cremation, use of organ and scattering of remains in Gardens of Remembrance at an unreserved time)				
Individual foetal remains	N	No charge	No charge	
Hospital arrangement – foetal remains	L	200.00	200.00	
Stillborn or child not exceeding 12 months	N	No charge	No charge	
Person over 12 months up to 18 years	N	No charge	No charge	
Person over 18 years	L	800.00	825.00	
After post mortem remains	L	200.00	200.00	
Other charges				
Medical Referee Fee	N	20.00	20.00	
Environmental Surcharge (set by CAMEO)	N	55.00	56.00	
Postal Carton	L	20.00	20.00	
Metal Urn	L	40.00	40.00	
Wooden Casket	L	50.00	50.00	
Baby Urn	L	10.00	10.00	
Crematorium Chapel	L	100.00	100.00	
Scattering of remains at reserved time	L	45.00	45.00	
Book of Remembrance (inclusive of 20% VAT)				
Single Entry (2 lines)	L	70.00	70.00	
Double Entry (3 or 4 lines)	L	110.00	110.00	
Additional lines	L	25.00	25.00	
Crest or floral emblem	L	115.00	115.00	
Memorial Cards (inclusive of 20% VAT)				
Single entry card (2 lines)	L	25.00	25.00	
Double entry card (3 or 4 lines)	L	30.00	30.00	
Additional lines	L	5.00	5.00	
Crest of floral emblem	L	70.00	70.00	
Personal photographs – set up	L	50.00	50.00	
Additional photographs – after set up	L	10.00	10.00	
Memorial Books (inclusive of 20% VAT)				
Single entry book (2 lines)	L	80.00	80.00	
Double entry card (3 or 4 lines)	L	85.00	85.00	
Additional lines	L	5.00	5.00	
Crest of floral emblem	L	70.00	70.00	
Personal photographs – set up	L	50.00	50.00	
Additional photographs – after set up	L	10.00	10.00	
Triptych (inclusive of 20% VAT)				
Single entry card (2 lines)	L	67.00	67.00	
Double entry (3 or 4 lines	L	72.00	72.00	
Additional lines	L	5.00	5.00	
Crest or floral emblem	L	70.00	70.00	
Personal Photographs – set up	L	50.00	50.00	
Additional Photographs – after set up	L	10.00	10.00	
Other Memorial Schemes				
Replacement kerb vase plaque	L	300.00	300.00	
Replacement flower holder	L	5.00	5.00	
Wall plaques	L	245.00	245.00	
Planter plaques	L	365.00	365.00	
Lease of space for memorial plaques (per annum)	L	25.00	25.00	
Total financial effect for Crematorium				**40,000**

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
ALLOTMENTS				
Rent per year	L	170.00	175.00	
				Minimal
SOUTH PARK RESOURCE CENTRE				
Educational Events (£/child for a full day)	L	4.10	4.20	
Educational Events (£/child for half day)	L	2.60	2.70	
				Minimal
HIGHWAYS				
Private apparatus in the Highway (Section 50 Licence, new installations)	L	350.00	550.00	
Private Road Openings (repair existing)	L	125.00	225.00	
Vehicle Crossings – estimate fee (taken as part of payment if go ahead with the works)	L	25.00	25.00	
Vehicle Crossings (plus actual construction costs)	L	100.00	100.00	
Vehicle Crossings if planning permission required on a classified road (plus actual construction costs)	L	150.00	150.00	
Temporary Road Closure Notices	L	130.00	130.00	
Temporary Road Closure Orders (plus advertising)	L	275.00	275.00	
Emergency Road Closures	L	125.00	130.00	
Street Naming Royal Mail Income (per address, Nationally agreed price LGIH)	L	1.00	1.00	
Street Naming & Numbering of Properties:				
- Per road name (developer suggests)	L	165.00	165.00	
- Per road name (council names)	L	200.00	200.00	
- Per plot	L	15.00	15.00	
Street Naming & Numbering of Properties:				
- Per plot or renaming of a property	L	35.00	35.00	
Rechargeable Works	L	Actual cost + 10%	Actual cost + 10%	
Temporary Traffic Light Applications	L	No Charge	No Charge	
Section 50 Licence associated bond costs	L	Individually priced based on requirements	Individually priced based on requirements	
Access protection markings	L	No charge	No charge	
Tourist Sign (plus actual cost of sign)	L	£75.00 + VAT	£75.00 + VAT	
Accident Data Requests	L	£75.00 + VAT	£75.00 + VAT	
Traffic Count Data	L	75.00	75.00	
Street Lighting Design Service	L	Individually priced based on charge out rate	Individually priced based on charge out rate	
Oversailing Licence	L	No charge	No charge	
Banner Licence	L	No charge	No charge	
Placing Goods on the Highway	L	155.00	155.00	
Deposits upon the Highway	L	No charge	No charge	
Temporary Development Signs – Admin Fee	L	200.00	200.00	
Temporary Development Signs – DBC undertake work on behalf of developer	L	Actual costs	Actual costs	
Switch off / on traffic signal / pelican crossings – per visit	L	150.00	150.00	
Unauthorised marks or affixing of signs to street furniture	L	No charge	No charge	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Section 278 Highway works agreement	N	6% of works + legal if delivered by developer	6% of works + legal if delivered by developer	
Section 116 Stopping Up of the Highway	N	Actual Costs	Actual Costs	
Section 38 Road Adoption agreement	N	6% of works + legal if delivered by developer	6% of works + legal if delivered by developer	
NRSWA Defect Charges	N	Nationally set scale of charges	Nationally set scale of charges	
NRSWA Road Opening Inspection Charges (sample)	N	Nationally set scale of charges	Nationally set scale of charges	
Section 74 – charges for overstays	N	Nationally set scale of charges	Nationally set scale of charges	
				Minimal
PUBLIC RIGHTS OF WAY				
Public Path Orders (HA 80 S 118 and 119, TCPA 90 s247, 257) Actual cost based on charge out rate plus advertising and legal costs				
PROW Temporary Closures – as Highways fees and charges				
Landowner Rights of Way Statement and Declaration s31.6				
One parcel of land, includes 2 notices	L	250.00	250.00	
Additional parcel	L	50.00	50.00	
Additional notice	L	50.00	50.00	
Authorisation for installing a new gate or stile (HA 80 s147)	L	100.00	100.00	
Path Orders under Deregulation Act Actual cost based on charge out rate plus advertising and legal costs, to include but not restricted to pre-application advice, processing the application, resolving objections, making the order, confirmation of the order, and any subsequent Public Inquiry or Hearing				
				NIL
SUSTAINABLE TRANSPORT				
Charges for Concessionary Travel (ENCTS);				
Replacement pass for lost/stolen without a CRN	L	10.00	10.00	
Learn to Ride per session (child)	L	3.00	3.00	
Production, placement and retrieval of notices when bus stops are temporarily per bus stop	L	60.00	60.00	
Production and placement of bus timetable information when bus services have to be re-registered due to road closures – up to 6 timetables	L	84.00	84.00	
				NIL
TRANSPORT SERVICES				
Charges for Taxi Licensing;				
Taxi Vehicle Test	L	50.00	50.00	
Taxi Vehicle Test and MOT	L	60.00	60.00	
Failure to attend (less than 48 hours' notice)	L	50.00	50.00	
Re-test	L	25.00	25.00	
Re-test including emissions	L	35.00	35.00	
Re-test emissions only	L	10.00	10.00	
Charges for General Public;				
MOT for Motorbike Class I & II	L	25.00	25.00	
MOT for Standard Car Class IV	L	35.00	35.00	
MOT for Class V Vehicles	L	40.00	40.00	
MOT for Class VII Vehicles	L	40.00	40.00	
				NIL

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
PRIVATE SECTOR HOUSING				
Works in default & statutory activities per hour	L	46.00	47.00	
Housing inspections & consultancy per hour (inclusive of VAT)	L	55.00	56.00	
Charge for the service relevant Housing Act 2004 legal notice	L	413.00	421.00	
Securing empty homes (addition of VAT by agreement)	L	275.00	280.00	
Houses in Multiple Occupation Activities;				
HMO licence fee per letting/let/tenancy	L	183.00	187.00	
Other relevant HMO activities per hour	L	46.00	47.00	
Housing Immigration Inspections;				
Within 10 working days (including VAT)	L	138.00	141.00	
Fast Track within 5 working days (including VAT)	L	184.00	188.00	
General Enforcement Activities:				
Hourly rate for preparation of case reports/prosecutions	L	46.00	47.00	
Additional copies of legal notices via post	L	10.00	10.00	
Smoke and Carbon Monoxide Alarms (England) Regulation 2015;				
Fines for failing to provide a working smoke or carbon monoxide alarm. Offence by the same individual or organisation;				
First	N	500.00	500.00	
Second	N	1,000.00	1,000.00	
Third	N	2,000.00	2,000.00	
Fourth	N	3,000.00	3,000.00	
Fifth or more	N	5,000.00	5,000.00	
The Redress Schemes for Letting Agency Work and Property Management Work (England) Order 2014;				
Fines for failing to join an approved letting and management redress scheme;				
Businesses that have been served with a notice of intent and failed to join an approved scheme	N	5,000.00	5,000.00	
Businesses that have joined an approved scheme following the service of the notice of intent	N	4,000.00	4,000.00	
Businesses that have joined an approved scheme prior to enforcement action being taken, after the 1st October 2014	N	3,000.00	3,000.00	

Description	Type**	Existing Charge £	New Charge £	Financial Effect £
****KEY for basis of fee and charges setting, L - Locally Agreed, N - Nationally Agreed**				
Energy Efficiency (Private Rented Property) (England and Wales) Regulations				
Penalty (less than 3 months in breach) renting a non-compliant property	N	Up to 2,000.00 and/or publication penalty	Up to 2,000.00 and/or publication penalty	
Penalty (3 months or more in breach) renting out a non-compliant property	N	Up to 4,000.00 and/or publication penalty	Up to 4,000.00 and/or publication penalty	
Providing false or misleading information on the PRS Exemptions Register	N	Up to 1,000.00 and/or publication penalty	Up to 1,000.00 and/or publication penalty	
Failing to comply with a compliance notice	N	Up to 2,000.00 and/or publication penalty	Up to 2,000.00 and/or publication penalty	
Housing and Planning Act 2016				
Failure to comply with an Improvement Notice (under section 30 of the Housing Act 2004)	N	Civil penalties of up to 30,000 per offence as an alternative to prosecution	Civil penalties of up to 30,000 per offence as an alternative to prosecution	
Failure to comply with a Prohibition Order (under section 32 of the Housing Act 2004) Breach of a banning order made under section 21 of the Housing and Planning Act 2016 (due to be enacted in November 2017); Using violence to secure entry to a property (under section 6 of the Criminal Law Act 1977) Illegal eviction or harassment of the occupiers of a property (under section 1 of the Protection from Eviction Act 1977)				
				Minimal
COST OF REVENUE COLLECTION				
Council Tax – All Charges do not incur VAT				
Issue of Summons for Liability Order	L	36.00	33.50	
Issue of Liability Order	L	44.00	44.00	
Issue of Summons for Committal Hearing	L	90.00	90.00	
Issue of Statutory Demand	L	157.50	157.50	
				Minimal
Business Rates (NNDR) – All Charges do not incur VAT				
Issue of Summons for Liability Order	L	36.00	33.50	
Issue of Liability Order	L	44.00	44.00	
Issue of Summons for Committal Hearing	L	90.00	90.00	
Issue of Statutory Demand	L	157.50	157.50	
				Minimal

APPENDIX 4

KEY ASSUMPTIONS USED IN PROJECTED RESOURCES, EXPENDITURE AND INCOME 2020-24

Factor	Assumption
Resources	
Council Tax base	Variable depending on projected additional properties.
Council Tax	3.99% increase in 2020/21 year (including a 2% precept for Adult Social Care) and then a 1.99% increase in 2021/22, 2022/23 & 2023/24.
Council Tax collection	99% collected
Government Grants	Government grants for 2020/21 as indicated in 2019 spending review and indicative figures for 2021/22 – 2023/24.
	Increase in Business Rates Scheme Top Up Grant of 2% in 2020/21 to 2023/24 (projected CPI).
	Revenue Support Grant 2020/21 increased by CPI and then flat lined to 2023/24.
	Continuation of Improved Better Care Fund (iBCF) at 2019/20 rates.
	Continuation of 2019/20 Social Care Support Grant + a new Social Care Support Grant = £2.952m in total and assumed to continue to 2023/24.
	New Homes Bonus (NHB) legacy payments will continue but no new ones assumed after 2020/21, any funding beyond this subject to 2020 Spending Review so assumed to discontinue in 2023/24.
Expenditure	
Pay inflation	2020-21 2% and thereafter 2% in line with national scheme.
Price inflation	Only contractual inflation on running costs
Local Government Pension Scheme	Contribution rate of 18.4% for 2020/21 – 2023/24 plus past service deficit contributions of £0.263m in 2020/21, £0.271m in 2021/22, £0.280m in 2022/23 & £0.288m in 2023/24
Financing Costs	
Interest rates payable	Average rate on existing debt 2020/21 of 2.95%; 2021/22 of 2.94%; 2022/23 of 3.02% & 2023/24 of 3.09%.
Interest rates payable on new debt – 10 year rate	2020/21 of 2.00%; 2021/22 of 2.33%; 2022/23 of 2.50% & 2023/24 of 2.65%.
Interest rates receivable	1.00% in 2020/21 & 2021/22; 1.50% in 2022/23 & 2023/24.
Income	
Inflationary increases	Various based on individual service considerations

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Appendix 5

REVENUE BUDGET MANAGEMENT 2019/20

Projected General Fund Reserve at 31st March 2020

	2019-23 MTFP (Feb 2019)
Medium Term Financial Plan (MTFP) :-	£000
MTFP Planned Opening Balance 01/04/2019	18,179
Approved net contribution from balances	(1,457)
Planned Closing Balance 31/03/2020	**16,722**
Increase in opening balance from 2018-19 results	168
Projected corporate underspends / (overspends) :-	
Adult Social Care & Health based savings	511
Council Wide	270
Financing Costs	126
Joint Venture - Investment Return	(68)
Release of Demand and Complexity Risk Contingency	188
Projected General Fund Reserve (excluding Departmental) at 31st March 2020	**17,917**
Planned Balance at 31st March 2020	**16,722**
Improvement	**1,195**

Departmental projected year-end balances

	Improvement / (decline) compared with 2019-23 MTFP
	£000
Children & Adults Services	(728)
Economic Growth & Neighbourhood Services	(51)
Resources	129
TOTAL	**(650)**

Summary Comparison with :-	2019-23 MTFP
	£000
Corporate Resources - increase in opening balance from 18/19 results	168
Corporate Resources - additional in-year Improvement/(Decline)	516
Quarter 1 budget claw back	511
Departmental - Improvement / (Decline)	(650)
Improvement / (Decline) compared with MTFP	**545**
Projected General Fund Reserve at 31st March 2020	**17,267**

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RISK RESERVE

	Risk	Consequence	Scale	Financial Loss £m	Likelihood %	Annual Risk £m	Period (Years)	Reserve Required £m
ECONOMIC	Economic Downturn	Reduced Revenue Income – Leisure, Parking, Planning, Property	£12m @ £0.120m per 1% - assess risk of further 5%	0.600	25%	0.150	2	0.300
		Failure of significant service provider contractors	£36m pa corporately – assess risk of 10% cost increase	3.600	10%	0.360	2	0.720
	Energy Costs Significant Increases	Higher Annual Revenue Costs		0.200	20%	0.040	2	0.080
	General Price Inflation	Higher Annual Revenue Costs	£40m – assess risk of 3%	1.200	20%	0.240	2	0.480
	Slow down in housing growth	Not achieving house growth as anticipated	100 Band D equivalents @ £0.03m	0.300	20%	0.060	2	0.120
	Adverse Changes in Interest Rates	Higher Financing costs	Net Debt £120m @ 1% = £1.2m	1.200	10%	0.120	1	0.120
	Brexit	Increased demand and reduced income	£80m net revenue budget @1%	0.800	25%	0.200	2	0.400
	Pandemic or Similar Event	Increased employee absence requiring cover at extra cost	£0.5M per 1% of employee costs	0.500	10%	0.050	1	0.050
SERVICES	New Children's Care Packages	Higher Costs	Average £0.200m per Case – 5 cases	1.000	30%	0.300	4	1.200
			Average £0.040m per case – 10 cases	0.400	30%	0.120	4	0.480
	Social Care Increasing Demand	Higher annual Revenue Costs		0.500	20%	0.100	2	0.200
	Capital Overspends	Fund from Revenue (no Capital Resources available)	One-off £5M funded over 10 years	0.500	10%	0.050	2	0.100
GENERAL	Corporate Manslaughter	Unlimited Fine	Assess risk of £10M fine	10.000	1%	0.100	1	0.100
	TOTAL GENERAL FUND RESERVE REQUIREMENT							**4.350**

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MEDIUM TERM FINANCIAL TERM 2020 TO 2024

	2020/21	2021/22	2022/23	2023/24
	£m	£m	£m	£m
Children and Adults Services	58.423	60.839	62.815	64.048
Economic Growth & Neighbourhood Services	20.867	22.173	22.969	23.671
Resources	10.229	10.412	10.707	10.882
Financing costs	0.895	1.096	1.419	3.196
Investment Returns - Joint Ventures	(1.028)	(0.812)	(0.517)	(0.494)
Council Wide Pressures	0.405	0.004	0.008	0.004
Counicl Wide Contingencies	0.522	0.525	0.525	1.512
Contribution to/(from) revenue balances	0.271	(1.948)	(3.670)	(6.712)
Total Net Expenditure	**90.584**	**92.289**	**94.256**	**96.107**
Resources - Projected and assumed				
Council Tax	52.179	53.951	55.697	57.450
Business rates retained locally	18.901	19.256	19.620	19.991
Top Up	7.297	7.443	7.592	7.744
Revenue Support Grant (RSG)	3.614	3.614	3.614	3.614
New Homes Bonus (NHB)	1.285	0.717	0.425	(0.000)
Better Care Fund (BCF)	4.356	4.356	4.356	4.356
Adult Social Care Support Grant	2.000	2.000	2.000	2.000
Additional Social Care Funding	0.952	0.952	0.952	0.952
Total Resources	**90.584**	**92.289**	**94.256**	**96.107**
Balances				
Opening balance	19.235	15.013	14.065	10.395
Risk Reserve	(4.350)	0.000	0.000	0.000
Futures Fund Reserve	(1.143)			
Contibution from Collection Fund	1.000	1.000	0.000	0.000
Contribution to/(from) balances	0.271	(1.948)	(3.670)	(6.712)
Closing balance	**15.013**	**14.065**	**10.395**	**3.683**

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ECONOMY AND RESOURCES SCRUTINY COMMITTEE

Thursday, 23 January 2020

PRESENT – Councillors Durham (Chair), Allen, Bartch, Harker, Mrs D Jones, Keir, McEwan, K Nicholson and Renton

APOLOGIES – Councillor Paley

ABSENT – Councillor L Hughes

ALSO IN ATTENDANCE – Councillors Clarke, Curry and B Jones

OFFICERS IN ATTENDANCE – Elizabeth Davison (Assistant Director Resources) and Shirley Wright (Democratic Manager)

ER27 DECLARATIONS OF INTEREST

There were no declarations of interest reported at the meeting.

ER28 MEDIUM TERM FINANCIAL PLAN - TO CONSIDER A RESPONSE TO CABINET ON THE PLAN TAKING INTO ACCOUNT THE VIEWS OF ALL THIS COUNCIL'S SCRUTINY COMMITTEES

Submitted – The Minutes (previously circulated) of meetings of this Council's Scrutiny Committees which had been held to discuss the proposals contained within the draft Medium-Term Financial Plan (MTFP) for 2020/21 to 2023/24, which were within their remits.

It was reported that all of the Scrutiny Committees had supported the proposals in relation to the proposed Council Tax increase of 2.00 per cent, plus the 2.00 per cent adult social care precept to fund Social Care for 2020/21, the investment of £1.8 million in the Futures Fund and the proposed fees and charges. Each of the Scrutiny Chairs/Vice-Chairs presented, at the meeting, the outcomes of their Scrutiny Committees.

In relation to the Minutes of this Scrutiny Committee held on 9 January 2020, clarification was given in relation to the reference in the Minutes to the futures fund funding from the unallocated balances of £4.7 million which had been used to invest in a number of priority areas as part of the 2018/19 and 2019/20 MTFPs; the receipt of the Local Government Finance Settlement; and the need to highlight 'competition' as an additional factor when considering any proposed increase to fees and charges.

In presenting the findings of the Health and Housing Scrutiny Committee Minutes, the Vice-Chair of that Scrutiny Committee referred particularly to the proposals to realign Public Health budgets which could result in a loss of funding to the Tees Valley. Questions were raised in relation to whether there were any significant pressures in that area going forward and it was confirmed that nothing significant had been highlighted in the short to medium term and that it was anticipated that there would be an inflationary increase in funding

The Chair of the Children and Young People Scrutiny Committee reported that that Scrutiny Committee had noted their concerns on the proposed changes to Home to School Transport and the impact that may have on the MTFP and that an update report would be submitted to the next ordinary meeting of the Children and Young People Scrutiny Committee.

In relation to the Minutes of the Adults Scrutiny Committee, the Chair of that Scrutiny Committee reported that it had supported the proposals to increase Council Tax by two per cent, plus the two per cent increase in adult social care precept as it had felt that the increase was necessary in order for the increasing costs of adult social care to be adequately funded. Reference was also made to the significant transformation work which had been undertaken in adult services and the savings which had been achieved to date which it was hoped would continue.

Reference was also made to proposal to increase Council housing rents by 2.7 per cent for 2020/21 and the suggestion that Scrutiny could look further into how the Housing Revenue Account money was being utilised.

RESOLVED – That Cabinet be advised that, having considered the proposed Medium-Term Financial Plan 2020/21 to 2023/24 and all of this Council's Scrutiny Committees comments and decisions thereon :-

(a) the majority view of this Scrutiny Committee is to :-

(i) support the proposed Council Tax increase of two per cent for the next financial year, plus the two per cent adult social care precept to fund social care for 2020/21;

(ii) support the proposed fees and charges; and

(iii) support the investment of £1.8 million into the Futures Fund, as set out in paragraph 60 of the submitted report; and

(b) the minority view of this Scrutiny Committee is to :-

(i) support the proposed Council Tax increase of two per cent for the next financial year, plus the two per cent adult social care precept to fund social care for 2020/21, however, in doing so, requests Cabinet to note that this increase is necessary as Adult Social Care services are not being funded sufficiently by the Government.

SPECIAL COUNCIL
20 FEBRUARY 2020

DARLINGTON CAPITAL STRATEGY

Responsible Cabinet Member – Heather Scott,
Leader of the Council and all Cabinet Members

Responsible Director – Chief Officers Executive

SUMMARY REPORT

Purpose of the Report

1. To approve the Councils Capital Strategy for 2020/21 which incorporates the capital programme priorities.

Summary

2. The revised Prudential Code for Capital Finance in Local Authorities 2017 requires every Council to publish a Capital Strategy and review on an annual basis. The Council published its first strategy in 2019/20 and attached in **Appendix 1** is the 2020/21 update. The Strategy is an evolving document which will grow over time, this year the Capital Programme at **Appendix 2** has been added for approval.

3. The Strategy provides an overview of how capital expenditure and financing plans are decided upon and provides the framework for the development, management and monitoring of the council capital investment plans. It focuses on core principles that underpin the Council's four-year capital programme and the governance framework which is in place.

4. The Strategy also highlights the resource streams available in terms of funding to the Council and the risk management approach taken.

5. The Strategy maintains a strong and current link to the Council's priorities and to its key strategy documents such as the Treasury Management Strategy, Medium Term Financial Plan and the Corporate Plan.

6. The Capital programme at Appendix 2 sets out the current agreed programme and proposes priorities for investment along with the funding streams which are summarised in Annex A.

7. No feedback has been received during the consultation period.

Recommendation

8. Council are requested to approve:-

(a) The Capital Strategy for 2020/21 – 2023/24 at Appendix 1
(b) The Capital Programme Appendix 2 with priorities summarised in Annex A.
(c) A delegation for Cabinet to vary the Capital Budget for 2020/21 by up to £0.5m without further Council approval.

Reasons

9. The recommendation is supported by the following reasons:-

(a) To ensure the Council adopts the Prudential Code for Capital Finance 2017.
(b) To enable the Council to invest in its assets.
(c) The Strategy is approved by Council.
(d) To ensure decisions can be made in a timely manner.

Paul Wildsmith
Managing Director

Background Papers
No background papers were used in the preparation of this report.

Elizabeth Davison: extension 5830

S17 Crime and Disorder	This report has no implications for crime and disorder
Health and Well Being	This report has no implications for the Council's Health and wellbeing Programme
Carbon Impact and Climate Change	The proposals in the report seek to continue to support the Council's responsibilities and ambitions to reduce carbon impact in the Council and the Borough.
Diversity	There are no specific implications on the Council's diversity agenda.
Wards Affected	All wards
Groups Affected	All groups
Budget and Policy Framework	The Capital Strategy and capital programme must be approved by full Council
Key Decision	The Capital Strategy and capital programme must be approved by full Council.
Urgent Decision	The Capital Strategy and capital programme must be approved by full Council.
One Darlington: Perfectly Placed	There are no issues adversely affecting the Community Strategy
Efficiency	Having a clear view on Capital investments and financing plans ensures value for money and subsequent efficiencies.
Impact on Looked After Children and Care Leavers	This report has no impact on Looked After Children or Care Leavers

APPENDIX 1

DARLINGTON BOROUGH COUNCIL

CAPITAL STRATEGY

2020/21

Darlington Borough Council

Capital Strategy

Introduction

1. The Capital Strategy has been developed in line with the CIPFA Prudential Code for Capital Finance in Local Authorities 2017. The Capital Strategy is intended to give a high level overview of how capital expenditure and financing plans are decided upon and provides the framework for the development, management and monitoring of the Council's capital investment plans.

2. The Strategy aligns with the priorities in the Corporate Plan and focuses on core principles that underpin the Council's approach to capital investments; the governance framework required to ensure the capital programme is delivered and provides value for money for the residents of Darlington.

3. The Strategy incorporates the Capital Programme **at Appendix 2** and is integrated with the Medium Term Financial Plan (MTFP), Asset Management Plan and Treasury Management Strategy and will be reviewed as such on an annual basis.

The Key objective of Darlington's Capital Strategy

4. The Capital Programme is the Council's plan of capital works for future years and includes details on the funding of schemes. The programme includes projects such as the purchase of land and buildings, construction of new buildings or roads, and the enhancement of existing assets. The capital strategy defines and outlines the approach to capital investments and is fundamental to the Council's financial planning process. The key objective of the capital strategy is to deliver a capital programme that;

   (a) Ensures capital expenditure and investment decisions are used to support the delivery of the services according to the priorities within the corporate plan and supporting strategies.
   (b) Is affordable, financially prudent and sustainable
   (c) The most cost effective use is made of existing assets and new capital investment.
   (d) Provides Value for Money
   (e) Encourages Invest to Save initiatives to make efficiencies within the Council's revenue budget.
   (f) Ensures the appraisal and prioritisation process for new schemes is robust and captures risks and mitigating factors.

The Council's Corporate Objectives and Priorities

5. Capital expenditure should support the Council's continuing commitment to the goals and ambitions set our within the Corporate Plan, which articulates the Council's determination to work with our partners to capitalise on our assets, to grow and share wealth, which in turn will assist in narrowing the inequalities gap. All capital expenditure proposals should be considered alongside the following three conditions which the council is committed to in order to achieve the vision;

   (a) Growing the Economy to create conditions for business existing and new to succeed and grow creating more jobs and wealth in the borough and a vibrant economy.
   (b) Building Strong Communities to help our communities work together and maximise their potential by investing in the social infrastructure of Darlington.
   (c) Spending Every Pound Wisely, investing in creative and innovative solutions to make sure we provide value for money.

6. Meeting these conditions will allow the Council to achieve the following desired outcomes;

   (a) More people healthy and independent
   (b) A safe and caring community
   (c) More businesses and more jobs
   (d) Enough support for people when needed
   (e) Children with the best start in life
   (f) More people active and involved
   (g) More people caring for our environment; and
   (h) A place designed to thrive.

Governance Arrangements

7. The Capital Programme is the Council's plan of capital works for future years, including details on the funding of the schemes.

8. The programme is determined by the need to incur capital expenditure, capital resources available; and the revenue implications flowing from the capital expenditure.

9. The Council's Constitution and financial regulations govern the capital programme process and require Full Council to agree the programme annually. The reports of the Chief Finance Officer will consider the compliance of the proposed schemes in the programme with the medium term financial plan, the capital resources available, the revenue implications of the proposed capital expenditure and any other relevant information.

10. All schemes are formally approved into the capital programme by following a process as set out in the financial regulations and approved by Council. The inclusion of a scheme in the programme does not constitute authority to incur expenditure. Each capital scheme shall be the subject of a written report by the responsible Director to Cabinet and this report shall include the need for the proposed expenditure, its place in the Council's strategic plans, the estimated capital cost analysed as appropriate, the estimated revenue implications (if applicable) and the methods of financing.

11. Reports for all proposed schemes with a value of more than £1 million shall also contain whole-life-cost evaluations, setting out the cost of the proposed scheme over its expected life, including any cost implications at the expiry of the life of the proposed scheme.

12. Cabinet receive regular capital monitoring reports and approve variations to the programme within Cabinets delegated authority limits.

13. Cabinet also considers new bids that fall outside the annual budget process.

14. Schemes with a final outturn level over £1m are reported to Cabinet comparing actual cost, timeliness and quality with the original and amended approvals.

15. Scrutiny Committees can call in Cabinet reports, receive and scrutinise reports.

16. All projects progressing to the capital programme follow the constitution and financial regulations and the capital programme is subject to internal and external audit.

Investment evaluation and prioritisation

17. As part of the budget planning process services are required to submit capital proposals for consideration to the Asset Management Group (AMG) for investment decisions. The capital investment appraisal process focuses on:

    (a) Policy and strategic fit
    (b) Affordability and resources
    (c) VFM, cost/benefit
    (d) Options appraisal
    (e) Risk assessment and
    (f) Capability and capacity within the Council to manage and deliver the project

18. Where capital expenditure requirements exceed external funding availability bids for internal resources are prepared and assessment by the AMG using a scoring model which has regard to the capital strategy, asset management plan, sustainable community strategy and the corporate plan. AMG submit to Chief Officers Executive (COE) a list of assessed bids. COE then develop proposals

for inclusion in the Capital Programme, Cabinet consider these proposals and make recommendations to Council for final approval.

19. The AMG, chaired by the Managing Director and including representation from all departments, maintain a continuous review of capital planning, management and reporting, with regard to best practice, experience and opportunities for improving the Council's capital and asset management.

20. The AMG oversee implementation of standards and procedures and make recommendations by other parties (Chief Officers Executive, Cabinet, Council) as appropriate. In developing their proposals, AMG shall, in addition to departmental capital expenditure plans, have due regard to:

    (a) the various funding streams available from government and other grants
    (b) developer contributions towards capital expenditure under section 106 agreements and any other similar arrangements
    (c) internal resources available from capital receipts, non-supported borrowing and revenue contributions to capital expenditure.

Invest to save projects

21. Departments are encouraged to consider innovation in service provision that can drive efficiency and deliver cashable savings. Invest to save bids will be considered on the same basis as other capital proposals, and need to demonstrate what savings and benefits will be achieved as a result of the proposed initiative. However, as the benefits of these schemes should outweigh the costs it is likely these bids will be prioritised.

Approvals outside the normal budget setting process

22. Any additional capital proposals required within year and outside the annual budget process must be submitted to the AMG for consideration. The group will then appraise the scheme and it will be reported to Cabinet for approval.

Capital or Treasury Management Investments

23. Treasury Management investment activity covers those investments which arise from the Council's cash flows and debt management activity, and ultimately represent balances which need to be invested until the cash is required for use in the course of business.

24. For Treasury Management investments the security and liquidity of funds are placed ahead of the investment return. The management of associated risk is set out in the Treasury Management Strategy and the Annual Investment Strategy.

Service and Commercial Investments

25. These are investments for policy reasons outside of normal treasury management activity. This may include:

Service Investments

26. These are investments held clearly and explicitly in the course of the provision, and for the purposes, of operational services, including economic regeneration. Any potential Service Investment would be presented to Cabinet for approval prior to commencement.

Commercial investments

27. These are investments taken mainly for financial reasons and may include investments taken with the aim of making a financial surplus for the Council.

28. Commercial investments also include fixed assets which are held primarily for financial benefit, such as investment properties. Any commercial Investment would be presented to Cabinet for approval prior to commencement.

Due Diligence

29. For all capital investments, the appropriate level of due diligence will be undertaken with the extent and depth reflecting the level of additional risk being considered.

30. Due diligence process and procedures will include:

- Effective scrutiny of proposed investments;
- Identification of the risk to both the capital sums invested and the returns;
- Understanding the extent and nature of any external underwriting of those risks;
- The potential impact on the financial sustainability of the Council if those risks come to fruition;
- Identification of the assets being held for security against debt and any prior charges on those assets;
- Where necessary independent and expert advice will be sought.

Loans to External Bodies or Organisations

31. The Council's capital programme also includes provision to provide loan facilities to external bodies or organisations for activities that are aligned to, and support, Council service objectives and/or corporate priorities. Examples may include,

supporting economic growth such as housebuilding and improving the health and wellbeing of local communities.

32. Under statutory regulations these loans are treated as capital expenditure.

33. In making such loans the Council is exposing itself to the risk of the borrower defaulting on loan repayments. The Council, in making these loans must therefore ensure they are prudent and have fully considered the risk implications. The Loans for these purposes will be subject to a financial appraisal and a series of due diligence checks, and only be provided if the Council is fully satisfied of the borrower's ability to meet their obligations. Wherever possible, the Council will aim to mitigate its risks and exposure to default by seeking appropriate additional security from the borrower. This may often be in the form of a legal charge over the borrower's property or assets.

34. All loans are agreed by Cabinet. All loans will be subject to close, regular monitoring.

35. The rate of interest charged on these facilities will be dependent on the nature and structure of the individual loan and the assessed risks to the Council. However, loans would usually only be provided on the basis that there is no net cost to the Council. In addition all loans will need to be State Aid compliant.

Funding Sources

36. The Council's capital programme is funded from a mix of sources including:

(a) Prudential Borrowing – The introduction of the Prudential code in 2004 allowed the Council to undertake unsupported borrowing itself. This borrowing is subject to the requirements of the Prudential Code for Capital Expenditure for Local Authorities. The Council must ensure that unsupported borrowing is affordable, prudent and cost effective. This funding can also be used as an option to front fund development to stimulate growth. This has provided the Council with the flexibility to raise capital funding as demand and business need have dictated. This type of borrowing has revenue implications for the Council in the form of financing costs.

(b) External Grants – A proportion of our capital funding comes through as external grant allocations from central government departments such as the Department for Transport and Department of Education. There is also external funding from the European Regional Development Fund which we have been successful in bidding on over the last few years. In addition direct funding is received from the Tees Valley Combined Authority (TVCA) under the new devolved arrangements. The TVCA has an approved investment plan of £588.2m over a ten year period and Darlington has been successful securing funding for a number of growth projects including

£10m for the Town Centre and £25m for Darlington Railway Station which is in development.

(c) A significant element of the capital investment programme is funded from the Housing Revenue Account. Funding towards the Council's New Build programme is also received from Homes England (HE). All Housing Capital schemes are funded this way and are prioritised through the Housing Business Plan.

(d) Section 106 and external contributions – elements of the capital programme are funded by contributions from private sector developers and partners.

(e) Revenue Funding – The Council can use revenue resources to fund capital projects on a direct basis, however, the impact of austerity on the Council's revenue budget has reduced options in this area and the preference is for Invest to Save projects where feasible.

(f) Capital Receipts – A capital receipt is an amount of money exceeding £10,000, which is generated from the sale of an asset. The Council is able to generate capital receipts through the sale of surplus assets such as land and buildings. The Council seeks to maximise the level of these resources which will be available to support the Council's plans.

Capital Investment Fund

37. At its meeting of 24 November 2016 the Council established a Capital Investment Fund of £10m which due to its success has subsequently been increased to £50m

38. Council approved the principle and establishment of the Capital Investment Fund to be used for innovative investment opportunities beyond the traditional Treasury Management Strategy in order to achieve greater returns given the low returns on investment due to the current economic climate.

39. The Council is utilising the fund to achieve greater returns by exploring more innovative approaches whilst at the same time being willing to take on a greater level of risk. Such approaches include loans to other organisations, joint venture house building, property investment or developing sites for sale.

40. The Investment fund also provides for wider benefits which extend further than direct reward and assist with economic regeneration and job opportunities.

41. Since the establishment of the fund and at the time of writing Cabinet have agreed to nine uses of the fund for schemes such as housing joint ventures,

office development, and pump priming with a commitment of £41.97m leaving a balance of £8.03m. All projects are detailed and reported to Cabinet for approval.

Economic Growth Investment Fund (EGIF)

42. The EGIF was set up in 2017/18 Growing the Economy is a priority for the Council and the Economic Growth Investment plan sets out what needs to be done in order for the Borough to accelerate sustainable, managed and planned economic growth. It also provides the structured framework required to ensure that a programme of investments is created that can deliver the strategic ambitions and goals of the Council.

43. The majority of the Plan is and will be completed in conjunction with the Tees Valley Combined Authority, however the Council needs to pump prime and match fund some of the schemes. The EGIF of £4.232m was established in 2017/18 and included in the capital programme.

44. Any proceeds from sites which subsequently become operational and sold will be reinvested in the fund for future developments.

45. Specific scheme approvals will be subject to detailed reports to Cabinet to release each scheme as and when they are required.

46. At the time of writing the fund has a balance of 0.904m uncommitted.

Risk Management

47. Risk is the threat that an event or action will adversely affect the Council's ability to achieve its objectives and to execute its strategies successfully.

48. Risk management is the process of identifying risks, evaluating their potential consequences and determining the most effective methods of managing them and responding to them. It is both a means of minimising the costs and disruption to the Council caused by undesired events and of ensuring that staff understand and appreciate the element of risk in all of their activities.

49. The aim is to reduce the frequency of adverse risk events occurring, minimise the severity of their consequences if they do occur, or to consider whether risk can be transferred to other parties.

50. To manage risk effectively, an assessment of risk should be taken on every capital project, mitigated where possible and monitored.

51. It is important to identify the appetite for risk by each scheme and for the capital programme as a whole, especially when investing in capital assets held primarily

for financial returns. Under the CIPFA Prudential Code these are defined as investments and so the key principle of control of risk and optimising returns consistent with the level of risk applies**.**

Knowledge and skills

52. The Council has professionally qualified staff across a range of disciplines including finance, legal and property that follow continuous professional development (CPD) and attend courses on an ongoing basis to keep abreast of new developments and skills.

53. The Council establishes project teams from all the professional disciplines from across the council as and when required. External professional advice is taken where required and will always be sought in consideration of any major commercial property investment decision.

54. Internal and external training is offered to Members to ensure they have up to date knowledge and expertise to understand and challenge capital and treasury decisions taken by the Assistant Director Resources.

APPENDIX 2

Darlington Borough Council
Capital Programme

1. The Council has an extensive capital programme with significant resources invested to purchase, improve, protect and maintain our assets, to enable the council to deliver its priorities for example purchasing land to enable road improvements or investing in modernising school buildings and housing. The Council continues to deliver a significant capital investment programme in the main funded from the Housing Revenue Account (HRA) and grant or other external funding which is targeted at specific schemes and programmes such as Transport and Schools. Furthermore investment from the Tees Valley Combined Authority (TVCA) along with European and other external funding sources are being used for economic growth initiatives.

2. The Council can also supplement these funding sources with its own resources such as capital receipts or prudential borrowing where there is a need, however as capital receipts are limited and prudential borrowing comes with future revenue implications there must be a strong business case for doing so.

3. In recent year there has been significant investment in economic growth either funded or pump primed by the Council, schemes such as Central Park including the National Biologics Centre and Business Central along with the Development of Feethams House which is Grade A Office accommodation, and recent Town Centre purchases are helping to make Darlington a more vibrant place to be. The Council's Investment Fund and Economic Growth Investment Fund are both being utilised to invest in these areas which ultimately increases business rates and the finances of the Council helping vital services to be funded.

4. The current capital programme stands at £226m as summarised in Table 1 below. The programme is monitored on a monthly basis and reported to Cabinet quarterly, the latest available monitoring report for the 2019/20 – 2020/23 was presented to Cabinet on 4 February 2020 and noted the programme was within budget with the majority of schemes on target.

Table 1

	Construction							
	Live Schemes£ 75k & Over	Annualised Schemes	Completed Schemes awaiting review	Live Schemes under £75k	Non construction	Capital investment fund	Housing New Build - not yet allocated	Total
Area	£m	£m	£m	£m	£m	£m	£m	£m
Housing	32.182	5.575	21.632	0.292	0.670	0.000	0.438	60.789
Economic Growth	34.661	0.000	26.746	0.556	6.178	41.969	0.000	110.110
Highways/Transport	5.466	16.113	3.289	0.898	0.883	0.000	0.000	26.649
Leisure & Culture	17.505	0.000	0.956	0.134	0.360	0.000	0.000	18.955
Education	3.434	0.089	2.299	0.156	0.280	0.000	0.000	6.258
Adult Social Care	0.000	0.000	0.138	0.000	0.993	0.000	0.000	1.131
Other	0.000	0.000	0.000	0.000	1.881	0.000	0.000	1.881
Total	**93.248**	**21.777**	**55.060**	**2.036**	**11.245**	**41.969**	**0.438**	**225.773**

5. In additional to the current agreed programme the Council looks ahead to future capital requirements based on the principles of the capital strategy. A four year timeframe has been adopted to fall in line with the revenue Medium Term Financial Plan. Attached at **Annex A** are the priority proposals for addition to the plan along with the funding methods. The majority of schemes are focused on Housing and Transport, funded via the HRA and grants respectively, there are however a number of Council funded corporate schemes to be approved.

6. The following paragraphs describe the major elements of the capital programme priorities for approval. Specific scheme funding release will be subject to detailed reports to Cabinet.

Corporate schemes – funding required

7. A number of the Council Office buildings in particular the Town Hall and Central house are ageing and are requiring more and more maintenance each year. A full refurbishment is cost prohibitive and would also be extremely disruptive for operations. A phased approach is therefore taken and each year the Corporate Landlord team review the buildings and recommend priority works for consideration. This year, two recommendations have been put forward for approval, The Town Hall alarm system and zoned heating control.

8. £0.200m is required for the Town Hall fire alarm system which is in need of replacement as the existing detectors are obsolete product so replacements are dependent on shelf stock. The original system is supplemented with an additional fire alarm panel ran in series which supports current detectors, this is not ideal as all interactions with the fire alarm system should be accessible from one panel. This is a health and safety priority.

9. £0.200m has been requested for the replacement of the existing redundant heating controls to re-establish the flexibility of local office temperature controls. The existing heating system can no longer regulate the temperatures in different

parts of the building and compensate for the solar gain in throughout the day. Addressing this issue will improve comfort levels experienced by staff and will also help our carbon commitment by reducing energy consumption.

10. Crown Street Library - £2.9m. Funding for the refurbishment and restoration of Crown Street Library following consultation alongside structural works to include roof replacement and mechanical and electrical works. The refurbishment work will be sympathetic to reflect the historic nature of the building and a full report to Cabinet will detail all works before funds are released.

11. Capitalised repairs – £0.250m is required for repairs on the council building stock to ensure it is fit for purpose. This is a rolling programme and details on specific areas of spend will be brought to Cabinet for consideration.

12. Advanced design fees - £0.150m per annum is requested to ensure that resources are available to work up any new schemes brought forward in relation to economic growth including site investigations on development sites, industrial and housing land. This funding has been invaluable in the past in enabling the Council to be site ready.

Corporate Schemes – funding secured

13. Allington Way Office Extension, £0.150m – Due to the growth in construction and project works there is a need to extend the existing accommodation as it is at maximum capacity for office based staff. An extension which would accommodate approximately 20 additional staff will future proof the building and enable the services to expand and respond to future business growth opportunities. The borrowing costs for this scheme will be funding from additional profits following increased turnover.

14. Cattle Market – funding of £0.350m is required to prepare for the Council taking possession of the Cattle Market site. This will include surveys, permissions, demolition and accommodation works to make the site safe for any temporary use and permanent development. This will be funded initially from the Economic Growth Investment Fund to be repaid when the site is developed.

15. Railway Heritage quarter – Funding of £20m has been secured from the Tees Valley Combined Authority for the Head of Steam site. A master plan has been developed for the Site, the vision being a Rail Heritage Quarter, which will turn the site into a world class attraction, working closely with on-site partners and others ahead of the 2025 celebrations. The work will include the refurbishment and restoration of the existing buildings and will also have the potential for new build. The project will be delivered in phases with phase 1 happening before 2025.

Government Funding

16. Set out below are details of the levels of Government funding available for investment by the Council in 2020/21 and an outline of the proposed use of these funds.

	2020/21 £m
Children's Services	
School Condition Allocation	0.142
Transport	
Local Transport Plan	2.575
Pothole Action fund	0.095
Other	
Disabled Facilities Grant	0.947
Total Capital Grant Available	**3.757**

School Condition Allocations

17. The Local Authority now only receives school condition funding for Community Maintained Schools. Maintenance funding for Academies is available through other routes. This funding received by the Local Authority will be spent in line with key priorities identified with each maintained school through the locally agreed asset management planning (LAMPA) process, carried out each January. There are no strict spend deadlines for these small scale condition related projects which are prioritised and completed as funding becomes available.

Transport and Highways

18. A new Local Transport Plan for the Tees Valley has been consulted upon and it is the intention that this will be endorsed by the Tees Valley Cabinet early in 2020. This will help set the spending plans for the funding allocations from the Department for Transport and from the Devolution deal. The Integrated Transport Programme(ITP) of TVCAs Investment plan identifies £256.7m of investment over the next 10 years. There will be projects and initiatives delivered in Darlington from this fund. However, these will be subject to separate business cases and approval processes as they are developed.

19. The new Tees Valley Local Transport Plan has a number of accompanying documents that set the strategy and vision for different modes of transport. Each Local Authority is required to produce a Local Improvement Plan, which will effectively replace the local authority Local Transport Plan. These plans will cover local priorities and maintenance requirements. The Department for Transport (DfT) releases capital funding to the Tees Valley Combined Authority (TVCA) to implement these plans based on a needs formula and this is transferred annually to the Local Authority. In 2020/21 the indicative amounts for Darlington are

£0.886m allocated for the Integrated Block and £1.689m for the Highways Maintenance Block (comprising £1.398m maintenance and £0.291m incentive funding, which is performance related payments, Darlington receive the maximum amount of funding based on assessments of our process and asset management).

20. The Local Improvement Plan for Darlington is being progressed and a programme of works for 2020/21 based the allocations above is being developed and scheduled for consideration by Cabinet in March 2020.

21. In addition to the above there is opportunistic funding announcements from the Department for Transport. For example in recent years Local Authorities have been allocated additional funding to deal with road repairs from the Pothole Action fund. Whilst, not confirmed it is anticipated a further amount could be received.

22. The Council has also submitted a bid into the Department for Transports Highway Maintenance Challenge Fund for £2.260m for additional road maintenance on the A68 and an announcement on whether this has been successful is expected by the end of the calendar year. The Council are also developing an expression of interest for a bid in the Department for Transports Pinch Point Programme that has to be submitted by the end of January 2020.

23. Pothole Action Fund – The Pothole Action Fund was announced in April 2016 by the government and gave local authorities in England £50 million a year, for 5 years, to help them tackle more than 4 million potholes. Funding is calculated according to the size of the local road network in the area. The Council's current allocation is circa £95k per year and this is expected to continue beyond the initial 5 year period.

Disabled Facility Grants

24. These grants are available if you are disabled and need to make changes to your home with examples being:

    - Widen doors and install ramps,
    - Improve access to rooms and facilities – e.g. stair lifts or a downstairs bathroom,
    - Provide a heating system suitable for your needs, and
    - Adapt heating or lighting controls to make them easier to use.

Housing

25. All Housing Capital schemes are funded fully from the Housing Revenue Account. The priorities identified through the Housing Business Plan to be funded from the estimated capital resources for 2020/21 include:-

(a) Adaptations and lifts – £0.150m budget is to deliver adaptations within the Council's housing stock to enable tenants with a disability to remain in their own home and live independently across the Borough and to complete any unplanned major works to passenger lifts within sheltered and extra care schemes.

(b) Heating Replacement - £1.335m to fund new condensing boiler and central heating upgrades. This work will predominantly be completed in the Haughton and Bank Top areas. There will also be some miscellaneous properties which will be included in the programme and we will be running a "just in time" programme of replacement for those boilers that fail before their due replacement date within the financial year.

(c) Structural Repairs - £0.500m has been set aside to address any structural issues that may be identified within the year.

(d) Lifeline Services - £0.050m is set aside to continue to provide upgrades to Lifeline equipment.

(e) Repairs before Painting - £0.100m will be invested in joinery repair works in anticipation of the cyclical external painting programme. This will cover around 1,200 properties at various locations within the Borough.

(f) Roofing – £0.500m for the replacement of roofs, fascia's, soffits and rainwater goods alongside the top-up of loft insulation where appropriate. The programme will primarily be in the Haughton area.

(g) Garages - £0.050m will be invested in improvements to the Council's garage blocks which will predominantly be in the Lascelles Park area.

(h) External Works - £0.300m will be used to provide new rear dividing fences and new footpaths to Council properties in various locations based on condition.

(i) Smoke Detectors - £0.025m is required to replace existing hard wired smoke and heat detectors where systems are now 10 years old and reaching the end of their recommended lifespan.

(j) Pavement Crossings - £0.032m has been identified to fund pavement crossings across the Borough.

(k) Replacement Door Programme - £0.350m will be used to replace external doors with energy efficient composite doors in the Lascelles Park area.

(l) Window Replacement - £0.500m has been identified to replace windows across the Borough with double glazed UPVC. These areas will be determined based on those in the poorest condition, but we will be working predominantly in the Haughton and Springfield areas.

(m) Internal planned maintenance – £1.595m for the replacement of kitchens and bathrooms, rewiring of electrical systems and heating system upgrades

where required. This work will predominantly be completed in the Lascelles Park area. There will also be some miscellaneous properties which will be included in the programme.

(n) Communal Works - £0.100m is required to replace communal doors and screens in the North Road area.

(o) New Build/Property acquisitions - £17.989m will be spent predominantly on the new build programme.

ANNEX A

Capital Medium Term Financial Plan 2020/21 - 2023/24

	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000	Total £'000
SPENDING PRIORITIES					
Children, Families & Learning					
School Condition Allocations	*142*	*142*	*142*	*142*	**568**
	142	**142**	**142**	**142**	**568**
Housing					
Adaptations / Lifts	150	150	150	150	**600**
Heating replacement programme	1,335	1,335	1,335	1,335	**5,340**
Structural works	500	500	500	500	**2,000**
Lifeline Services	50	50	50	50	**200**
Repairs before painting	100	100	100	100	**400**
Roofing	500	500	500	500	**2,000**
Garages	50	50	50	50	**200**
External Works (footpaths, fencing, etc.)	300	300	300	300	**1,200**
Smoke detection	25	25	25	25	**100**
Pavement Crossing	32	32	32	32	**128**
Replacement Door Programme	350	350	350	350	**1,400**
Window Replacement	500	500	500	500	**2,000**
IPM works	1,595	1,595	1,595	1,595	**6,380**
Comunal Works	100	100	100	100	**400**
New build (net of HE grant)/regeneration	17,989	17,632	15,082	15,082	**65,785**
Fees	267	267	267	267	**1,068**
	23,843	**23,486**	**20,936**	**20,936**	**89,201**
Transport					
Highway Maintenance	*1,689*	*1,689*	*1,689*	*1,689*	**6,756**
Integrated Transport	*886*	*886*	*886*	*886*	**3,544**
Pothole Action fund	*95*	*95*	*95*	*95*	**380**
	2,670	**2,670**	**2,670**	**2,670**	**10,680**
Other Capital Programmes					
Disabled Facility Grants	947	*947*	*947*	*947*	**3,788**
	947	**947**	**947**	**947**	**3,788**
Council Schemes - funding required					
Town Hall - Fire Alarm Renewal	200	-	-	-	**200**
Town Hall - Zoned Heating Control	200	-	-	-	**200**
Crown Street Library	2,900	-	-	-	**2,900**
Capitalised Repairs	250	250	250	250	**1,000**
Advanced Design Fees	150	150	150	150	**600**
	3,700	**400**	**400**	**400**	**4,900**
Council schemes - funding secured.					
Allington Way - Office Extension	150	-	-	-	**150**
Cattle Market - site works	350	-	-		**350**
Railway Heritage Quarter	-	-	10,000	10,000	**20,000**
	500	**-**	**10,000**	**10,000**	**20,500**
TOTAL SPENDING PLANS	**31,802**	**27,645**	**35,095**	**35,095**	**129,637**
FUNDED BY;					
Capital Grants	3,759	3,759	3,759	3,759	**15,036**
HRA Revenue Contributions	5,551	5,551	5,551	5,551	**22,204**
HRA Investment Fund	8,722	4,982	4,982	4,982	**23,668**
HRA Capital Receipts	303	303	303	303	**1,212**
HRA Borrowing	9,267	12,650	10,100	10,100	**42,117**
Corporate Resources (borrowing or capital receipts)	3,700	400	400	400	**4,900**
Self Financing	500	-	10,000	10,000	**20,500**
TOTAL RESOURCES	**31,802**	**27,645**	**35,095**	**35,095**	**129,637**

Figures shown in italics are estimates, awaiting confirmation of funding streams.

SPECIAL COUNCIL
20 FEBRUARY 2020

HOUSING REVENUE ACCOUNT – MTFP 2020/21 TO 2023/24

Responsible Cabinet Member - Councillor Lorraine Tostevin
Health and Housing Portfolio

Responsible Director – Ian Williams
Director of Economic Growth and Neighbourhood Services

SUMMARY REPORT

Purpose of the Report

1. To consider proposals for the revenue budget, rent levels and service charges for the Council's Housing Revenue Account (HRA) for the financial year 2020/21 in the context of the HRA Medium Term Financial Plan to 2023/24 and the 30-year Business Plan.

Summary

2. The key decision regarding the HRA is the balance between rent and service charge levels and investment in the housing stock. For the first time since 2016/17 Local Authorities have once again been given the discretion to inflate rents by CPI plus 1%, which means an average £2.02 increase in weekly rents. Having had four years of compulsory reductions of rent minus 1% for four consecutive years it is recommended that we increase all rents to the maximum allowed. Similarly, it is recommended that where appropriate service charges also have an inflationary increase. However, members may opt for continued rent reductions or a rent increase of a lesser amount than CPI plus 1% if they wish. Clearly the less income we receive the less we are able to invest in the management and maintenance of our tenant's homes and the number of new properties we are able to provide would also be reduced. It is worth noting that 68% of tenants will have their rent and most service charges covered by benefit payments. Our rent and service charges also tend to be much lower than other Social Landlords operating in Darlington due to historical differences in government guidance on what Housing Associations and Local Authorities could charge.

3. As Central Government has now lifted the borrowing cap on the HRA we are using this additional capacity to invest in building much needed new homes. In 2020/21 we can borrow an extra £9m to fund our housing capital programme. This can be supplemented with Homes England grant and we plan to build 100 affordable homes per annum over the next 10 years. We also have over 50% of households with one or more person with a disability and we are therefore committed to providing good quality homes with generous space standards and lifetime homes principles to support people to live independently and have a good quality of life. All properties are designed to meet a good standard of thermal efficiency. Over 220 households have already benefitted from our current new build programme which

has taken place at various locations around the town and demand continues to be exceptionally high.

Recommendations

4. It is proposed that the following are approved by Council :

   (a) An average weekly rent increase of 2.7% for 2020/21 be implemented giving an average social rent of £71.30 and affordable rent of £82.55

   (b) Garage rents and service charges are increased as shown in Table 3.

   (c) The budget at **Appendix 1** is approved.

   (d) The Housing Business Plan **Appendix 2** is agreed.

   (e) That the Director of Economic Growth and Neighbourhood Services be given delegated powers to proceed with new build schemes for affordable rent using the funding as identified at paragraph 16.

   (f) That the Director of Economic Growth and Neighbourhood Services be given delegated powers to acquire dwellings in the private sector as opportunities arise, particularly as part of regeneration initiatives as discussed at paragraph 17 of this report.

Reason

5. To enable the Council to deliver an appropriate level of service to tenants to meet housing need and to support the economic growth of the Borough through housing development.

Ian Williams
Director of Economic Growth and Neighbourhood Services

Background Papers
MHCLG Rent Guidance

Pauline Mitchell: Ext 5831

S17 Crime and Disorder	The contents of this report have been considered in the context of the requirements placed on the Council by Section 17 of the Crime and Disorder Act 1998, namely, the duty on the Council to exercise its functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. It is not considered that the contents of this report have any such effect.
Health and Well Being	By ensuring our housing stock is in good condition we are making a positive contribution to the Health and well- being of our Council tenants

Carbon Impact and Climate Change	There are a range of energy efficiency measures included in the business plan which will have a positive carbon impact
Diversity	There are no diversity issues
Wards Affected	This will have an effect on all Wards in the Borough with Council Housing.
Groups Affected	All Council Tenants and Lifeline Service Users
Budget and Policy Framework	The issues contained within this report require Council approval and the report will be presented to Council in February 2019.
Key Decision	This is a key decision because agreement to the recommendations will result in the Local Authority incurring expenditure which is significant. There will also be a significant effect on the communities living or working in an area comprising two or more wards within the area of the local authority.
Urgent Decision	This is not an urgent decision for Cabinet, as the approval of Council on February 2019 will be required.
One Darlington: Perfectly Placed	Improving the existing housing stock and external environment, as well as, the new build programme will all contribute towards the sustainability agenda.
Efficiency	As the HRA is a ring-fenced budget every effort is made to maximise income and identify savings in order to maintain a high quality service.
Impact on Looked After Children and Care Leavers	No impact

MAIN REPORT

Setting the MTFP for the HRA

6. Councils now have the flexibility to decide the balance between the levels of service provided to tenants and the levels of rent charged provided they are no higher than the maximum level determined by the DWP. This is known as the limit rent. In Darlington for 2020/21 the maximum average increase allowed will be 2.7%. This is particularly welcome as for a four-year period from 2016/17 all social and affordable rents had to be reduced by 1% per annum which significantly impacted on our overall business plan. It is recommended therefore that we increase all rents to the maximum allowed. Similarly, it is recommended that where appropriate service charges also have an inflationary increase. However, members may opt for continued rent reductions or a rent increase of a lesser amount than the government guidance of CPI plus 1% if they wish. Clearly the less income we receive the less we are able to invest in the management and maintenance of our tenant's homes and the number of new properties we are able to provide would also be reduced. It is worth noting that 68% of tenants will have their rent and most service charges covered by benefit payments. Our rent and service charges also tend to be much lower than other Social Landlords operating in Darlington due to historical differences in government guidance on what Housing Associations and Local Authorities could charge.

7. As Central Government has now lifted the borrowing cap on the HRA we are using this additional capacity to invest in building much needed new homes. In 2020/21 we can borrow an extra £9m to fund our housing capital programme. This can be supplemented with Homes England grant and we plan to build 100 affordable homes per annum over the next 10 years. This can be supplemented with Homes England grant to provide more than 1000 much needed new Council homes at affordable rents over the next 10 years. Around 220 households have already benefitted from our current new build programme which has taken place across the Borough with sites at Branksome, Red Hall, Skerne Park, Lingfield and Lascelles Park. Overall demand has been exceptionally high.

8. **Analysis of Expenditure within the HRA**

   (a) **Management £2.804m**
   This includes all staffing costs associated with the provision of a housing management service, central support service and other associated support costs such as ICT and insurance.

   (b) **Service Charges and other contributions to expenditure £3.010m**
   This covers services charges to tenants such as grounds maintenance and Lifeline Services charges to a range of clients. All service charges are fully recoverable. It also includes recharges that will be recovered through additional income including court costs.

   (c) **Maintenance - Revenue Repairs - £4.075m**
   This covers the on-going general repairs to the Council's 5,293 properties at a rate of approximately £606 per property per year. This level represents an average spend and reflects the overall good condition of the stock due to sustained capital investment. The continued investment in a good repairs service is essential to maintaining our stock at a good level for current and future tenants.

   (d) **Capital Financing Costs - £3.211m**
   This is the cost of paying for borrowing undertaken to fund capital expenditure.

   (e) **Bad Debts Provision - £0.350m**
   This is a provision to cover rents that are deemed unrecoverable.

   (f) **Revenue Contributions to Capital Programme - £14.273m**
   This represents the amount by which the HRA is able to fund major capital works. In addition to this the Council continues to be successful in bidding for grant funding from Homes England towards the building of new houses.

Borrowing

9. The HRA borrowing cap has now been abolished. We are now able to prudentially borrow and have included additional borrowing of £9m in 2020/21 to build new affordable houses.

10. Members will appreciate that expenditure items (a) to (d) are relatively fixed and the main variable is the type and location of capital investment. The proposed Business Plan is discussed in the following section and this explains where future

capital investment is planned.

Housing Business Plan

11. All Housing Capital schemes are funded fully from the Housing Revenue Account. This includes the proposal to spend £17.989m on new build activity or the acquisition of private properties if appropriate. The other priorities identified through the Housing Business Plan to be funded from the estimated capital resources for 2020/21 include:-

    (a) Adaptations and lifts – £0.150m budget is to deliver adaptations within the Council's housing stock to enable tenants with a disability to remain in their own home and live independently across the Borough and to complete any major works to passenger lifts within sheltered and extra care schemes.

    (b) Heating Replacement - £1.335m to fund new energy efficient condensing boilers and central heating upgrades. This work will predominantly be completed in the Haughton and Bank Top areas. There will also be some miscellaneous properties which will be included in the programme and we will be running a "just in time" programme of replacement for those boilers that fail before their due replacement date within the financial year.

    (c) Structural Repairs - £0.500m has been set aside to address any structural issues that may be identified within the year, including brickwork repointing alongside the roofing programme.

    (d) Lifeline Services - £0.050m is set aside to continue to provide upgrades to Lifeline equipment.

    (e) Repairs before Painting - £0.100m will be invested in joinery repair works in anticipation of the cyclical external painting programme. This will cover around 1200 properties at various locations.

    (f) Roofing – £0.500m for the replacement of roofs, fascia's, soffits and rainwater goods together with the top-up of loft insulation where appropriate. The programme will primarily be in the Haughton area.

    (g) Garages - £0.050m will be invested in improvements to the Council's garage blocks which will predominantly be in the Lascelles Park area.

    (h) External Works - £0.300m will be used to provide new rear dividing fences and new footpaths to Council properties in various locations based on condition.

    (i) Smoke Detectors - £0.025m is required to replace existing hard-wired smoke and heat detectors where systems are now 10 years old and reaching the end of their recommended lifespan.

    (j) Pavement Crossings - £0.032m has been identified to fund pavement crossings and hard-standings across the Borough.

    (k) Replacement Door Programme - £0.350m will be used to replace external doors with energy efficient composite doors in the Lascelles Park area.

(l) Window Replacement - £0.500m has been identified to replace windows across the Borough with double glazed UPVC. These areas will be determined based on those in the poorest condition, but we will be working predominantly in the Haughton and Springfield areas.

(m) Internal planned maintenance – £1.595m for the replacement of kitchens and bathrooms, rewiring of electrical systems and heating system upgrades where required. This work will predominantly be completed in the Lascelles Park area. There will also be some miscellaneous properties which will be included in the programme.

(n) Communal Works - £0.100m is required to replace communal doors in the North Road area.

(o) New Build/Property acquisitions - £17.989m will be spent predominantly on the new build programme.

12. The purpose of the Housing Business Plan is to ensure that the Housing Service has a financial plan which is sustainable and focuses investment towards strategic priorities. During the development of the Business Plan it has become clear that there are a number of strategic investment priorities that are particularly pressing and have significant financial implications for both the Housing Revenue Account and the Council's General Fund.

13. The following proposals will outline these strategic priorities, the resources available to deliver on these priorities (subject to final decisions on rent levels) and how resources will be aligned against the priorities.

New Build

14. The Strategic Housing Market Assessment completed for Darlington in 2015 identified that there is a need for 160 affordable dwellings for rent across the Borough of Darlington each year and housing associations provide relatively low numbers of affordable housing units on average.

15. Not only is there a need to build affordable dwellings to meet local need, it is also a business need for the Housing Service. The Business Plan is underpinned by the rents received from Council properties and the loss of rents as a result of previous regeneration works and ongoing right to buy sales would significantly reduce income for the Housing Service if these properties were not replaced. Similarly, the impact for New Homes Bonus of overall reductions in property numbers needs to be taken into account.

16. Now that the HRA borrowing cap has been abolished we are able to prudentially borrow an additional £9m in the current year to build new affordable houses. This is in addition to £9m available from revenue contributions to capital giving us a total of £18m available for the development of new Council homes for rent or other property acquisitions. We have also assumed that we will be successful in grant applications to the Homes England's Affordable Housing Programme. It is difficult to predict grant funding levels as funding is now available on the basis of a rolling programme, but we have received up to 40% of the overall costs for recent schemes. A number of new build sites have been identified and are currently being worked up in more detail to enable planning permission to be sought. Meanwhile

delegated powers are being requested for the Director of Economic Growth and Neighbourhood Services to enable new build schemes to be progressed in a timely manner subject to planning permission. **Appendix 3** shows we are anticipating spending around £81m on new build in total going forward and with projected Homes England grant of £27m.

17. There may also be a strategic need in the future to acquire a small number of properties in the private sector to either address a specific housing need or as part of the regeneration of an area of older housing. Included in the Council's refreshed Corporate Plan there is a commitment to addressing poor quality private housing and bringing empty homes back into use. This will include buying up empty properties where appropriate. Delegated powers are therefore being requested for the Director of Economic Growth and Neighbourhood Services to purchase private sector properties where appropriate.

Housing for Vulnerable People

18. Each year Housing Services complete a range of minor and major adaptions to individual Council properties where a need has been identified by an Occupational Therapist. Works range from the provision of lever taps and grab rails to semi-permanent ramps, stair lifts, hoists and ground floor extensions.

19. The HRA adaptations budget reflects the fundamental role adaptations play in supporting households to continue to live independently, reduce the need for expensive care packages and prevent a premature move into a more supported form of accommodation. These high levels of need have therefore been taken into account in developing our new build housing programme. The properties provided as part of our ongoing new build programme have been built in accordance with Lifetime Homes standards. Inexpensive features include flush door entrances at front and rear for wheelchair access, and raised sockets, as well as, low level window sills and openings. Increased space standards allow for hallways wide enough for 360º wheelchair turning circles, wider doors, and ground floor toilets. Occupational Therapists and Housing Officers also work closely with individuals to meet their particular needs where appropriate, providing bespoke lowered kitchens, specific bathing requirements etc. before they move in wherever possible.

20. This approach has significantly reduced the demands on the adaptations budget. However, going forward we will need to balance the additional costs of providing properties to this standard with anticipated future increased Building Regulation requirements in response to the Climate Change agenda.

Existing Stock Investment and Responsive Repairs

21. In accordance with good practice, the housing stock is surveyed by an independent specialist organisation every five years and detailed analysis of the data takes place to help inform our priorities. Overall our properties have been assessed as being in good condition, reflecting our significant annual investment as part of a structured programme for both on-going capital improvements and maintenance resulting in:-

    (a) All stock meeting the Decent Homes Standard by 2006.

(b) A proactive approach to capital improvement work ensuring all stock is maintained to a standard above the Decent Homes Standard, locally known as the Darlington Standard.

(c) An average SAP rating of over 70 across the Council housing stock indicating an above average level of thermal comfort. This can be largely attributed to a central heating programme providing A-rated combi-boilers and a planned maintenance programme which ensures all properties suitable benefit from cavity wall insulation and 300mm of loft insulation. A significant number of properties with previously poor SAP ratings have also been targeted in recent years for a more comprehensive package of energy efficiency measures including double glazed UPVC windows, composite doors and in some cases external cladding.

22. The Business Plan identifies a capital works budget of around £110m over the next five years and £255m budget for capital works over the next 30 years, including the New Build Programme. This budget will ensure all works identified within the stock condition survey can be completed alongside additional works to maintain properties to the Darlington Standard.

23. The Business Plan anticipates responsive repairs will remain at historical levels and so allocates a budget of £28m for responsive and cyclical repairs within the five-year investment plan and £186m within the 30-year investment plan.

Rent Level Options

24. The main objective of the Government's policy on rent restructuring is that rents should be fair and affordable for tenants in the social rented sector. The policy sets out a common basis on which all rents in the social sector should be set. This means that the rent for a house or flat (known as the formula rent) is linked to its capital value, size, location, condition and local earnings so that tenants can make a proper choice between how much they pay and the size and quality of the property they live in. As set out in paragraph 6 of this report Councils now have the flexibility to decide the balance between the levels of rent charged, provided they are no higher than the maximum level determined by the DWP. Examples of weekly rent increases based on an increase of CPI plus 1% are provided at **Appendix 4**.

25. As part of the Affordable Housing Programme 2015/18 the Council was given approval to convert social housing rents to affordable rents as properties became available to let and this was approved by Council in February 2016. We have continued with our new build programme and assumed this arrangement could continue. However, we have now been advised by Homes England that the rules have changed, and conversions are only now possible where specialist accommodation is being provided. Retrospective approval is not possible. Officers are currently working closely with Homes England to determine which future new build schemes may qualify as specialist housing. Meanwhile we have ceased converting properties on re-let. We have identified around 400 tenancies which are affected where we will need to refund the additional rent we have incorrectly charged, and this equates to £125K.

Garage Rents and Service Charges

26. The budget at Appendix 1 includes the financial effect of the proposed increases. The proposed service charges shown below at Table 3 provide for achieving full recovery of costs from those tenants who directly benefit from the services provided. In most instances this means a small inflationary increase is necessary but in some instances no increase is needed to maintain current levels of service.

27. Any additional costs will be covered by Housing Benefit or Universal Credit for the 68% of tenants who are eligible. The HRA funds a Money Advice Service and Income Management Team to address the financial challenges facing a number of Council tenants and referrals are also made to CAB for independent financial advice as well as to food banks and furniture recycling schemes. Those tenants, particularly first-time tenants who require more sustained intensive support will be referred to the Housing Plus Team.

Table 3: Garage Rents and Service Charges

Description	Current Weekly Charge (19/20)	Proposed Weekly Charge (20/21)
	£	£
Garage Rents	7.88	8.01
Building Cleaning – Flats	1.82	1.85
Building Cleaning – Sheltered Schemes	3.70	3.81
Building Cleaning – Extra Care	11.78	12.02
Grounds Maintenance – General Housing	1.74	1.76
Grounds Maintenance – Blocks of Flats	1.74	1.76
Heating – Comprehensive schemes	11.46	11.46
Heating – Blocks of flats	1.48	1.50
Administration – Leaseholders	1.71	1.74
Furnishings and Fittings – Comprehensive Schemes	1.98	2.01
Furnishings and Fittings – Good Neighbour Schemes	0.89	0.92
White Goods Scheme	15.13	15.13
Lifeline Response	5.52	5.78
Lifeline – Sheltered and Extra Care Housing	17.77	17.92
Pavement Crossings and Hard standings	4.25	4.32
Mid-day Meal – Extra Care (Residents only)	34.21	34.21
Mid-day Meal – Extra Care (Non-Residents only)	41.11	41.11
Guest Rooms in Sheltered Schemes	84.17	85.60
Door Entry Systems	0.68	0.72
TV Aerials	0.19	0.19
Housing Plus Service	18.43	19.01

Consultation

28. The Annual Review of the HRA Business Plan is developed in consultation with Council tenants through their Tenants Forum and associated sub-groups, supplemented with surveys and focus groups.

Financial Implications

29. The estimates included in this report represent a fair view of ongoing plans and commitments although Members will appreciate some budgets are subject to volatility and will continue to be monitored closely.

30. The level of revenue balances projected in this report represent an adequate level given the level of risk.

HOUSING REVENUE ACCOUNT

Appendix 1

	2020/21	2021/22	2022/23	2023/24	2024/25
	£000	£000	£000	£000	£000
Income					
Rents Of Dwellings (Gross)	(20,555)	(21,110)	(22,014)	(22,475)	(22,711)
Sundry Rents (Including Garages & Shops)	(429)	(436)	(443)	(450)	(421)
Charges For Services & Facilities	(3,049)	(3,083)	(3,093)	(3,109)	(3,124)
Contribution towards expenditure	(265)	(270)	(275)	(281)	(286)
Interest Receivable	(6)	(6)	(6)	(6)	(6)
Total Income	(24,304)	(24,905)	(25,831)	(26,320)	(26,547)
Expenditure					
Management	5,814	5,890	6,075	6,166	6,247
Capital Financing Costs	3,211	3,840	4,201	4,634	5,122
Increase in Bad Debt Provision	350	350	350	350	350
HRA Revenue Repairs	4,075	4,157	4,240	4,325	4,411
Revenue Contribution to Capital (R.C.C.O.)	14,273	10,533	10,533	10,533	10,533
Contribution to/(from) balance	(3,419)	135	432	312	(116)
Total Expenditure	24,304	24,904	25,830	26,320	26,547
(Surplus) / Deficit	**0**	**0**	**0**	**0**	**0**
Opening balance	**15,326**	**11,907**	**12,042**	**12,474**	**12,786**
Contribution to/(from) balance	**(3,419)**	**135**	**432**	**312**	**(116)**
Closing balance	**11,907**	**12,042**	**12,474**	**12,786**	**12,670**
of which: Capital Investment Fund	*8,722*	*4,982*	*4,982*	*4,982*	*4,982*
HRA Working Balance	*3,185*	*7,060*	*7,492*	*7,804*	*7,688*
Estimated closing dwelling numbers	**5,423**	**5,585**	**5,722**	**5,849**	**5,976**
Closing balance per dwelling	**£2,195.59**	**£2,156.14**	**£2,180.06**	**£2,186.14**	**£2,120.29**

THIRTY YEAR INVESTMENT FORECAST 2020/21 - 2049/50 **Appendix 2**

	Years 1-10 (£000)	Years 11-20 (£000)	Years 21-30 (£000)	Total Spend (£000)
Adaptations / Lifts	1,500	1,500	1,500	4,500
Communal Works	1,000	1,000	1,000	3,000
Decoration following IPM	390	391	391	1,172
External works (footpaths, fencing, etc.)	3,000	3,000	3,000	9,000
Garage Improvements	500	500	500	1,500
Heating Replacements	13,401	12,932	12,251	38,584
Internal Planned Maintenance	20,592	22,799	21,598	64,989
Repairs before painting	1,000	1,000	1,000	3,000
Roof work	5,000	5,000	5,000	15,000
Structural Repairs	5,000	5,000	5,000	15,000
Warden Link & Sheltered Housing	500	500	500	1,500
Energy Efficiency	8,500	8,500	8,500	25,500
Professional Fees	2,670	2,670	2,670	8,010
Smoke / Fire Alarms	250	250	250	750
Pavement Crossing	320	320	320	960
New build and regeneration capital investment	65,785	0	0	65,785
Total expenditure	**129,408**	**65,362**	**63,480**	**258,250**

HRA Business Plan – Draft 5 Year Investment Plan

Appendix 3

	2020/21	2021/22	2022/23	2023/24	2024/25
	£000's	£000's	£000's	£000's	£000's
Scheme / Project					
Adaptations / Lifts	150	150	150	150	150
Heating replacement programme	1,335	1,335	1,335	1,335	1,335
Structural works	500	500	500	500	500
Lifeline Services*	50	50	50	50	50
Repairs before painting	100	100	100	100	100
Roofing	500	500	500	500	500
Garages	50	50	50	50	50
External Works (footpaths, fencing, fabric etc.)	300	300	300	300	300
Smoke detection	25	25	25	25	25
Pavement Crossing	32	32	32	32	32
Replacement Door Programme	350	350	350	350	350
Window Replacement	500	500	500	500	500
IPM works	1,595	1,595	1,595	1,595	1,595
Communal Works	100	100	100	100	100
New build (net of HE grant)/regeneration	17,989	17,632	15,082	15,082	15,082
Fees	267	267	267	267	267
Total spend	**23,843**	**23,486**	**20,936**	**20,936**	**20,936**
Resourced by:					
Capital Receipts	303	303	303	303	303
RCCO	5,551	5,551	5,551	5,551	5,551
Additional Borrowing	9,267	12,650	10,100	10,100	10,100
Investment Fund	8,722	4,982	4,982	4,982	4,982

Examples of Weekly Rent Changes for 2020/21

Appendix 4

Area		Property Type	Approved Rent 2019/20	Proposed Rent 2020/21	Increase between 19/20 & 20/21	Increase between 19/20 & 20/21	
					£	%	
Middleton St George							
	Mount Pleasant Close	1 Bedroom Bungalow	79.43	81.57	2.14	2.7%	*
	Pounteys Close	2 Bedroom House	74.67	76.68	2.01	2.7%	
	Thorntree Gardens	3 Bedroom house	85.17	87.47	2.30	2.7%	
Cockerton							
	Newton Court	1 Bedroom Flat	61.66	63.33	1.67	2.7%	
	Elvet Place	2 Bedroom House	72.21	74.16	1.95	2.7%	
	Minors Crescent	3 Bedroom House	77.79	79.90	2.11	2.7%	
Haughton							
	Ted Fletcher Court	1 Bedroom Flat	62.18	63.86	1.68	2.7%	
	Lyonette Road	2 Bedroom Flat	70.43	72.33	1.90	2.7%	
	Nightingale Avenue	1 Bedroom Bungalow	74.83	76.85	2.02	2.7%	*
	Rockwell Avenue	2 Bedroom House	74.10	76.10	2.00	2.7%	
	Dunelm Walk	3 Bedroom House	82.84	85.08	2.24	2.7%	
Branksome							
	Branksome Hall	1 Bedroom Flat	61.76	63.42	1.66	2.7%	*
	Whitby Way	1 Bedroom Bungalow	68.31	70.15	1.84	2.7%	*
	Malvern Crescent	2 Bedroom House	70.83	72.75	1.91	2.7%	
	Rosedale Crescent	3 Bedroom House	80.53	82.70	2.17	2.7%	
	Sherborne Clsoe	2 Bedfroom Flat	85.34	87.64	2.30	2.7%	*
Lascelles							
	Coxwold House	1 Bedroom Flat	61.04	62.69	1.65	2.7%	
	Gilling Crescent	2 Bedroom Flat	68.07	69.91	1.84	2.7%	
	Aldbrough Walk	2 Bedroom House	80.14	82.30	2.16	2.7%	*
	Caldwell Green	3 Bedroom House	77.34	79.43	2.09	2.7%	

Area		Property Type	Approved Rent 2019/20	Proposed Rent 2020/21	Increase between 19/20 & 20/21	Increase between 19/20 & 20/21	
	Fenby Avenue	3 Bedroom House	96.48	99.08	2.60	2.7%	*
Bank Top							
	Graham Court	1 Bedroom Flat	62.15	63.83	1.68	2.7%	
	Graham Court	3 Bedroom House	88.49	90.88	2.39	2.7%	*
Redhall							
	Bramall House	1 Bedroom Flat	74.23	76.23	2.00	2.7%	*
	Aviemore Court	2 Bedroom Flat	65.57	67.34	1.77	2.7%	
	Murrayfield Way	1 Bedroom Bungalow	63.22	64.93	1.71	2.7%	
	Aintree Court	2 Bedroom House	67.02	68.83	1.81	2.7%	
	Aintree Court	3 Bedroom House	88.05	90.43	2.38	2.7%	*
Eastbourne							
	West Moor Road	1 Bedroom Flat	58.57	60.15	1.58	2.7%	
	Tansley Gardens	2 Bedroom Flat	65.23	66.99	1.76	2.7%	
	Firthmoor Crescent	2 Bedroom House	67.93	69.77	1.83	2.7%	
	Brignall Moor Crescent	3 Bedroom House	73.53	75.52	1.99	2.7%	
Skerne Park							
	Trent Place	2 Bed House	68.69	70.54	1.85	2.7%	*
	Humber Place	3 Bed House	74.23	76.23	2.00	2.7%	
Parkside							
	Wordsworth Road	1 Bedroom Flat	62.23	63.91	1.68	2.7%	
	Shakespeare Road	2 Bedroom House	77.85	79.95	2.10	2.7%	*
	Ruskin Road	3 Bedroom House	81.30	83.49	2.19	2.7%	*

* Affordable rent properties - these rents include applicable service charges.

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SPECIAL COUNCIL
20 FEBRUARY 2020

PRUDENTIAL INDICATORS AND TREASURY MANAGEMENT STRATEGY REPORT 2020/21

Responsible Cabinet Member – Councillor Charles Johnson, Resources Portfolio

Responsible Director - Paul Wildsmith, Managing Director

SUMMARY REPORT

Purpose of the Report

1. This report requests Council to approve and adopt the following :-

    (a) The Prudential Indicators and Limits for 2020/21 to 2022/23 relating to capital expenditure and Treasury Management activity.

    (b) A policy statement relating to the Minimum Revenue Provision.

    (c) The Treasury Management Strategy 2020/21, which includes the Annual Investment Strategy for 2020/21

2. The report outlines the Council's prudential indicators for 2020/21 – 2022/23 and sets out the expected treasury operations for this period. It fulfils key legislative and guidance requirements:

    (a) The reporting of the **prudential indicators** setting out the expected capital activities and treasury management prudential indicators included as treasury indicators in the Chartered Institute of Public Finance and Accountancy (CIPFA) Treasury Management Code of Practice

    (b) The Council's **Minimum Revenue Provision (MRP) Policy**, which sets out how the Council will pay for capital assets through revenue each year.

    (c) The **treasury management strategy** statement which sets out how the Council's treasury service will support capital decisions taken above, the day to day treasury management and the limitations on activity through treasury prudential indicators.

    (d) The key indicator is the **authorised limit**, the maximum amount of debt the Council could afford in the short term, but which is not sustainable in the longer term.

    (e) The **investment strategy** which sets out the Council's criteria for choosing the investment counterparties and limiting exposures to the risk of loss.

3. The information contained in the report regarding the Councils expenditure plans, Treasury Management and Prudential Borrowing activities indicate that they are:-

    (a) Within the statutory framework and consistent with the relevant codes of practice.

    (b) Prudent, affordable and sustainable.

    (c) An integral part of the Council's Revenue and Capital Medium Term Financial Plans.

Recommendation

4. It is recommended that Council approve and adopt the following:

    (a) The Prudential Indicators and limits for 2020/21 to 2022/23 summarised in Tables 1 and 2.

    (b) The Minimum Revenue Provision (MRP) statement (paragraphs 35 - 39).

    (c) The Treasury Management Strategy 2020/21 to 2022/23 as summarised in paragraphs 43 to 69.

    (d) The Annual Investment Strategy 2020/21 contained in paragraphs 70 to 109.

Reasons

5. The recommendations are supported by the following reasons :-

    (a) In order to comply with the Prudential Code for Capital Finance in Local Authorities and the Ministry of Housing, Communities & Local Government (MHCLG) guidance on investments.

    (b) To comply with the requirements of the Local Government Act 2003.

    (c) To approve a framework for officers to work within when making investment decisions.

Paul Wildsmith
Managing Director

Background Papers

(i) Annual Statement of Account 2018/19
(ii) Draft Capital Strategy (incl Capital MTFP 2020/21 to 2023/24)
(iii) Link Asset Services Economic Report Dec 2019

Peter Carrick: Extension 5401

S17 Crime and Disorder	This report has no implications for S 17 Crime and Disorder.
Health and Well Being	This report has no implications for the Council's Health and Well being agenda.
Carbon Impact and Climate Change	This report has no implications for the Council's Carbon Emissions.
Diversity	This report has no implications for the Council's Diversity agenda.
Wards Affected	All Wards
Groups Affected	All Groups
Budget and Policy Framework	This report must be considered by Council.
Key Decision	This is not an executive decision
Urgent Decision	For the purposes of call in this report is not an urgent decision.
One Darlington: Perfectly Placed	This report has no particular implications for the sustainable Community Strategy.
Efficiency	The report refers to actions taken to reduce costs and manage risks.
Impact on Looked After Children and Care Leavers	This report has no impact on Looked After Children or Care Leavers.

MAIN REPORT

Information and Analysis

Background

6. The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's risk appetite, providing adequate liquidity initially before considering investment return.

7. The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.

8. The contribution the treasury management function makes to the Council is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

9. Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day to day treasury management activities.

10. CIPFA defines treasury management as:

"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

Reporting requirements

Capital Strategy

11. The 2017 CIPFA Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report, which will provide the following:
    - a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
    - an overview of how the associated risk is managed
    - the implications for future financial sustainability

12. The aim of the capital strategy is to ensure that all elected members on the full council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

13. This capital strategy is reported separately from the Treasury Management Strategy Statement; non-treasury investments will be reported through the former. This ensures the separation of the core treasury function under security, liquidity and yield principles, and the policy and commercialism investments usually driven by expenditure on an asset. The capital strategy will show:

    - The corporate governance arrangements for these types of activities;
    - Any service objectives relating to the investments;
    - The risks associated with each activity.

14. Where a physical asset is being bought, details of market research, advisers used, (and their monitoring), ongoing costs and investment requirements and any credit information will be disclosed, including the ability to sell the asset and realise the investment cash.

15. If any non-treasury investment sustains a loss during the final accounts and audit process, the strategy and revenue implications will be reported through the same procedure as the capital strategy.

16. To demonstrate the proportionality between the treasury operations and the non-treasury operation, high-level comparators are shown throughout this report.

Treasury Management Reporting

17. The Council is required by legislation to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals. These reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Audit Committee.

Prudential and Treasury Indicators and Treasury Strategy (this report)

18. The first, and most important report is forward looking and covers:

(a) The capital plans (including prudential indicators);
(b) A minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
(c) The treasury management strategy, (how the investments and borrowings are to be organised), including treasury indicators; and
(d) An investment strategy, (the parameters on how investments are to be managed).

A Mid-Year Treasury Management Report

19. This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether the treasury function is meeting the strategy or whether any policies require revision.

An Annual Treasury Report

20. This is a backward looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

Treasury Management Strategy for 2020/21

21. The strategy for 2020/21 covers two main areas:

(a) Capital Issues:
- the capital expenditure plans and the prudential indicators;
- the minimum revenue provision (MRP) policy.

(b) Treasury Management Issues:
- the current treasury position;
- treasury indicators which will limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- policy on use of external service providers.

22. These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, MHCLG MRP Guidance, the CIPFA Treasury Management Code and the MHCLG Investment Guidance.

23. A summary of the key prudential indicators and limits are contained in Tables 1 and 2 and further details are contained further on in this report.

Table 1 – Capital Expenditure and Borrowing

	2019/20 Revised	2020/21 Estimated	2021/22 Estimated	2022/23 Estimated
Capital Expenditure Table 3 and 4	38.658	45.179	26.147	33.966
Capital financing requirement Table 5	216.930	226.040	227.789	225.063
Ratio of financing costs to net revenue stream – General Fund See paragraph 43/44 Table 6	3.39%	2.39%	2.24%	2.47%
Ratio of financing costs to net revenue stream – HRA See paragraph 43/44 Table 6	15.03%	17.48%	16.72%	18.15%
Operational boundary for external debt Table 8	185.258	199.118	202.992	201.877
Authorised limit for external debt Table 9	227.776	237.342	239.178	236.316

Table 2 – Treasury Management

	2020/21 Upper Limit	2021/22 Upper Limit	2022/23 Upper Limit
Limits on fixed interest rates	100%	100%	100%
Limits on variable interest rates	40%	40%	40%
Maximum principal sums invested > 364 days	£50m	£50m	£50m
Maturity Structure of fixed interest rate borrowing 2020/210			
		Lower Limit	**Upper Limit**
Under 12 months		0%	40%
12 months to 2 years		0%	50%
2 years to 5 years		0%	60%
5 years to 10 years		0%	80%
10 years and above		0%	100%

Training

24. The CIPFA code requires the responsible officer to ensure that Members with responsibility for treasury management receive adequate training in treasury management. This especially applies to Members responsible for scrutiny. Training was undertaken by a number of Members during 2 sessions held in

March 2018 and further training will be arranged as required. The training needs of treasury management officers are periodically reviewed.

Treasury Management Consultants

25. The Council uses Link Asset Services, Treasury solutions as its external treasury management advisors. The Council recognises that responsibility for treasury decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of our external service provider. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisors.

26. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The officers of the Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subject to regular review.

The Capital Prudential Indicators 2020/21– 2022/23

27. The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

Capital Expenditure

28. This Prudential Indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts:

Table 3 Capital Expenditure

	2019/20 Revised £m	2020/21 Estimate £m	2021/22 Estimate £m	2022/23 Estimate £m
General Fund	17.280	15.457	4.157	14.157
HRA	10.834	28.843	23.486	20.936
Estimated Capital Expenditure	**28.114**	**44.300**	**27.643**	**35.093**
Loans to Joint Ventures	10.544	0.879	(1.496)	(1.127)
Total	**38.658**	**45.179**	**26.147**	**33.966**

29. The financing need above excludes other long-term liabilities, such as PFI and leasing arrangements which already include borrowing instruments.

30. The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Table 4 Financing of the Capital Programme

	2019/20 Revised £m	2020/21 Estimate £m	2021/22 Estimate £m	2022/23 Estimate £m
General Fund	17.280	15.457	4.157	14.157
HRA	10.834	28.843	23.486	20.936
Loans to Joint Ventures	10.544	0.879	(1.496)	(1.127)
Total Capital	**38.658**	**45.179**	**26.147**	**33.966**
Financed by:				
Capital receipts -General Fund	1.705	0.800	0.400	0.400
Capital receipts - Housing	0.200	0.303	0.303	0.303
Capital grants	14.753	8.757	3.757	3.757
Self financing - GF	0.000	0.500	0.000	10.000
Revenue Contributions (Housing)	`10.634	10.551	5.551	5.551
HRA Investment Fund	0.000	8.722	4.982	4.982
Total excluding borrowing	**27.292**	**29.633**	**14.993**	**24.993**
Borrowing need	**11.366**	**15.546**	**11.154**	**8.973**

The Council's Borrowing Need (the Capital Financing Requirement)

31. The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

32. The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each assets life, and so charges the economic consumption of capital assets as they are used.

33. The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases) brought onto the balance sheet. Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility by the PFI or lease provider and so the Council is not required to separately borrow for these schemes. The Council currently has £11.498m of such schemes within the CFR.

34. The Council is asked to approve the CFR projections below:-

Table 5 – CFR Projections

	2019/20 Revised £m	2020/21 Estimate £m	2021/22 Estimate £m	2022/23 Estimate £m
CFR – General Fund	119.680	124.680	124.680	124.680
CFR – PFI and Finance leases	11.498	10.358	9.232	8.117
CFR - housing	68.967	73.338	77.709	77.225
CFR - Loans to Joint Ventures	16.785	17.664	16.168	15.041
Total CFR	**216.930**	**226.040**	**227.789**	**225.063**
Movement in CFR		**9.110**	**1.749**	**(2.726)**

MRP Policy Statement

35. The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP). It is also allowed to undertake additional voluntary payments if desired (voluntary revenue provision - VRP).

36. MHCLG regulations have been issued which require the full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision.

37. It is proposed that Darlington Borough Council's MRP policy statement for 2020/21 will be:-

    (a) For Capital expenditure incurred before 1 April 2008 and expenditure which was granted through credit approvals since that date MRP will be calculated on an annuity basis (2%) over 50 years or the useful life of the asset.

    (b) Capital Expenditure from 1 April 2008 for all unsupported borrowing MRP will be based on the estimated life of the assets, repayments will be on an annuity basis (2%)

    (c) Repayments relating to the PFI scheme will be based on the life of the asset of 60 years from 1st April 2008 on an annuity basis (2%).

    (d) Where MRP has been overcharged in previous years, the recovery of the overcharge will be affected by reducing the MRP charges, due in full or in part for 2020/21 and in future years, which would otherwise have been made. The MRP adjustment for 2020/21 and in future years charge will be done in such a way as to ensure that:-

        - the total MRP after applying the adjustment will not be less than zero in any financial year,

        - the cumulative amount adjusted for will never exceed the amount over-charged,

- the extent of the adjustment will be reviewed on an annual basis.

38. There is no requirement on the HRA to make a minimum revenue provision but there is a requirement for a charge for depreciation to be made.

39. Repayments included in annual PFI or finance leases are applied as MRP.

Affordability Prudential Indicators

40. The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators.

Estimates of the ratio of financing costs to net revenue stream.

41. This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream.

Table 6 - Ratio of financing costs to net revenue stream

	2019/20 Revised	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
General Fund	3.39%	2.39%	2.24%	2.47%
HRA	15.03%	17.48%	16.72%	18.15%

42. The estimates of financing costs include current commitments and the proposals in this year's MTFP report.

Treasury Management Strategy

Borrowing

43. The capital expenditure plans set out in the previous paragraphs provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of approporiate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

Under Borrowing position

44. Over the last ten years the Council had maintained an underborrowed position i.e. the amount of our gross external borrowing has been less than our balance sheet Capital Financing Requirement. This strategy has served the Council well in a period where returns on investment have been low and borrowing costs have been relatively high. This has also meant that we have had less in the form of investments and so reduced counterparty risk. To support the MTFP it was agreed

that longer term investments would be pursued as these would give a return over and above the cost of any additional borrowing that would be taken. Following due diligence the Council has 3 Property Funds with £10 million in each fund and these are expected to bring a net return of around 2.5% over the life of the MTFP. Additional borrowing of £25m was undertaken which resulted in the underborrowed position being reduced.

Current Portfolio Position

45. The Council's expected treasury portfolio position at 31 March 2020, with forward projections summarised below at Table 7. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

Table 7 - Gross Borrowing to CFR

	2019/20 Revised £m	2020/21 Estimate £m	2021/22 Estimate £m	2022/23 Estimate £m
Debt at 31 March	154.975	169.096	175.592	176.719
Loans to Joint Ventures	16.785	17.664	16.168	15.041
Other long-term liabilities (OLTL)	11.498	10.358	9.232	8.117
Gross Actual debt at 31 March	**183.258**	**197.118**	**200.992**	**199.877**
The Capital Financing Requirement from Table 5	**216.930**	**226.040**	**227.789**	**225.063**
Under / (over) borrowing	**33.672**	**28.922**	**26.797**	**25.186**

46. Within the Prudential Indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2020/21 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that the borrowing is not undertaken for revenue or speculative purposes.

47. The Assistant Director Resources reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This takes into account current commitments, existing plans, and proposals within this budget report.

Treasury Indicators: Limits to Borrowing Activity

The Operational Boundary

48. This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

Table 8 - Operational Boundary

	2019/20 Revised £m	2020/21 Estimate £m	2021/22 Estimate £m	2022/23 Estimate £m
Debt from Table 7	171.760	186.760	191.760	191.760
Other long term liabilities	11.498	10.358	9.232	8.117
Prudential Borrowing for leasable assets	1.000	1.000	1.000	1.000
Prudential Borrowing under Directors Delegated Powers	1.000	1.000	1.000	1.000
Operational Boundary	**185.258**	**199.118**	**202.992**	**201.877**

The Authorised Limit for external debt

49. This is a key prudential indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term:

50. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

51. The Council is asked to approve the following Authorised Limit:

Table 9 – Authorised Limit

	2019/20 Revised £m	2020/21 Estimate £m	2021/22 Estimate £m	2022/23 Estimate £m
CFR	216.930	226.040	227.789	225.063
Additional Headroom @ 5%	10.846	11.302	11.389	11.253
Authorised Limit	**227.776**	**237.342**	**239.178**	**236.316**

52. It is proposed that the additional headroom for years 2020/21 to 2022/23 is 5% above the CFR, this would allow for any additional cash flow needs throughout the years.

Prospects for Interest Rates

53. The Council has appointed Link Asset Services as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. The following table gives Link Asset Services's central view for future interest rates and the economic background to that view is shown at Appendix 1.

Table 11

Annual Average %	Bank Rate %	PWLB Borrowing Rates % (including *certainty rate adjustment)			
		5 year	10 year	25 year	50 year
Mar 2020	0.75	2.40	2.70	3.30	3.20
Jun 2020	0.75	2.40	2.70	3.40	3.30
Sep 2020	0.75	2.50	2.70	3.40	3.30
Dec 2020	1.00	2.50	2.80	3.50	3.40
Mar 2021	1.00	2.60	2.90	3.60	3.50
Jun 2021	1.00	2.70	3.00	3.70	3.60
Sep 2021	1.00	2.80	3.10	3.70	3.60
Dec 2021	1.00	2.90	3.20	3.80	3.60
Mar 2022	1.00	2.90	3.20	3.90	3.70
Jun 2022	1.25	3.00	3.30	4.00	3.80
Sep 2022	1.25	3.10	3.30	4.00	3.90
Dec 2022	1.25	3.20	3.40	4.10	3.90
Mar 2023	1.25	3.20	3.50	4.10	4.00

** The certainty rate adjustment is a reduced rate by 0.20% for those councils like Darlington Borough Council who have submitted more detail on future borrowing requirement to the Treasury*

Investment and borrowing rates

54. Investment returns are likely to remain low during 2020/21 with little increase in the following 2 years. However, if major progress was made with an agreed Brexit, then there is upside potential for earnings.

55. Borrowing interest rates were on a major falling trend during the first half of 2019-20 but then jumped up by 100 basis points (bps) on 9 September 2019. The policy of avoiding new borrowing by running down spare cash balances has served local authorities well over the last few years. However, the unexpected increase off 100bps in PWLB rates requires a major rethink of local authority treasury management strategy and risk management.

56. Although the gap between longer term borrowing rates and investment rates has materially widened, and in the long term Bank Rate is not expected to rise above 2.5%, it is still likely that this authority will do some further long term borrowing due to the abolition of the HRA debt cap which will enable the Council to borrow to enhance its social housing stock.

57. While the Council will not be able to avoid borrowing to finance new capital expenditure, to replace maturing debt and the rundown of reserves, there will be a cost of carry (the difference between higher borrowing costs and lower investment returns), so any new short or medium-term borrowing that causes a temporary increase in cash balances as this position will, most likely, incur a revenue cost.

Borrowing Strategy

58. The Council is currently maintaining an under-borrowed position although this has reduced from previous years. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a

temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue to be considered.

59. Against this background and the risks within the economic forecast, caution will be adopted with the 2020/21 treasury operations. The Assistant Director Resources will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

    (a) If it was felt that there was a significant risk of a sharp FALL in borowing rates (eg due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.

    (b) If it was felt that there was a significant risk of a much sharper RISE in borrowing rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

60. Any decisions would be reported to the appropriate Committee at the next available opportunity.

Treasury Management Limits on Activity

61. There are three debt related treasury activity limits. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs/improve performance. The indicators are:

    (a) Upper limits on variable interest rate exposure. This identifies a maximum limit for variable interest rates based upon the debt position net of investments

    (b) Upper limits on fixed interest rate exposure. This is similar to the previous indicator and covers a maximum limit on fixed interest rates;

    (c) Maturity structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits. The Council is asked to approve the following treasury indicators and limits:

Table 12 Interest Rate Exposure

	2020/21	2021/22	2022/23
	Upper	**Upper**	**Upper**
Limits on fixed interest rates based on net debt	100%	100%	100%
Limits on variable interest rates based on net debt	40%	40%	40%
Maturity Structure of fixed interest rate borrowing 2020/21			
		Lower	**Upper**
Under 12 months		0%	40%
12 months to 2 years		0%	50%
2 years to 5 years		0%	60%
5 years to 10 years		0%	80%
10 years and above		0%	100%

Policy on Borrowing in Advance of Need

62. The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance of need will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds through its investment strategy.

63. Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

Debt Rescheduling

64. Rescheduling of current borrowing in our debt portfolio is unlikely to occur as the 100bps increase in PWLB rates only applied to new borrowing rates and not to premature debt repayment rates.

65. If there was a possibility the reasons for any rescheduling to take place will include:

    (a) the generation of cash savings and / or discounted cash flow savings;

    (b) helping to fulfil the treasury strategy;

    (c) enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).

66. Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.

67. If rescheduling was done it will be reported to Committee at the earliest meeting following its action.

New Financial Institutions as a source of borrowing

68. Following the decision by the PWLB to increase their margin over gilt yield by 100bps points to 180bps on loans lent to local authorities, consideration will also need to be given to sourcing funding at cheaper rates from the following:

- Local authorities (primarily shorter dated maturities)
- Financial institutions (primarily insurance companies and pension funds but also some banks, out of spot or forward dates)
- Municipal Bond Agency (no issuance at present but there is potential)

69. The degree which any of these options proves cheaper than PWLB Certainty Rate is still evolving at the time of wrting but our advisors will kepp us informed.

Annual Investment Strategy

Investment and Creditworthiness Policy

70. The MHCLG and CIPFA have extended the meaning of 'investments' to include both financial and non-financial investments. This report deals soley with financial investments (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy.

71. The Council's investment policy has regard to the following:

(a) MHCLG's Guidance on Local Government Investments ("the Guidance")
(b) CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 ("the Code")
(c) CIPFA Treasury Management Guidance Notes 2018

72. The Council's investment priorities will be security first, liquidity second and then yield (return).

73. The above guidance from the MHCLG and CIPFA place a high priority on the management of risk. This Council has adopted a prudent approach to managing risk and defines its risk appetite by the following means:

(a) Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparies are the short term and long-term ratings.

(b) Other information: ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its

advisors to maintain a monitor on market pricing such as 'credit default swaps' and overlay that information on top of the credit ratings.

(c) Other information sources used will include the financial press, share prices and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

(d) This Council has defined the list of types of investment instruments that the treasury management team are authorised to use. There are 2 lists in **Appendix 2** under the categories of 'specified' and 'non-specified' investments.

- Specified investments are those with a high level of credit quality and subject to a maturity limit of one year.

- Non-specified investments are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by Members and officers before being authorised for use.Once an investment is classed as non-specified, it remains non-specified all the way through to maturity. i.e. an 18 month deposit would still be non-specified even it it has only 11 months left until maturity.

(e) Non-specified investment limit. The Council has determined that it will limit the maximum total exposure to non-specified investments as being X% of the total investment.

(f) Lending limits, (amounts and maturity), for each counterparty will be set through applying the matrix table in Table 13

(g) Transaction limits are set for each type of investment in Table 13

(h) This Council wil set a limit for the amount of its investments which are invested for longer than 365 days.

(i) Investments will be placed with counterparties from countries with a specified minimum sovereign rating.

(j) This Council has engaged external consultants, to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this Council in the context of the expected level of cash balances and need for liquidity throughout the year.

(k) All investments will be denominated in sterling.

(l) As a result of the change in accounting standards for 2019/20 under International Financial Reporting Standard (IFRS) 9, this Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018 the Ministry of Housing, Communities and Local Government [MHCLG], conlcuded a consultation for a temporary override to allow English local

authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for 5 years commencing from 1 April 2018).

74. However, this Council will also pursue value for money in treasury mangement and will monitor the yield from investment income against appropriate benchmarks for investment performance. Regular monitoring of investment performance will be carried out during the year.

Investment Counterparty Selection Criteria

75. The primary principle governing the Council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle the Council will ensure that:

    (a) It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security, and monitoring their security. This is set out in the Specified and Non-Specified investment sections below; and

    (b) It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's prudential indicators covering the maximum principal sums invested.

76. The Assistant Director Resources will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to that which determines which types of investment instrument are either specified or non-specified (see appendix 2 for definitions) as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.

77. The rating criteria use the lowest common denominator method of selecting counterparties and applying limits. This means that the application of the Council's minimum criteria will apply to the lowest available rating for any institution. For instance, if an institution is rated by two agencies, one meets the Council's criteria, the other does not, the institution will fall outside the lending criteria. This is in compliance with a CIPFA Treasury Management Panel recommendation in March 2009 and the CIPFA Treasury Management Code of Practice.

78. Credit rating information is supplied by Link Asset Services, our treasury advisors, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating watches (notification of a likely change), rating Outlooks (notification of a longer term bias outside the central rating view) are provided to officers almost immediately after they occur and this information is considered before dealing. For instance, a negative rating Watch applying to a counterparty at the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.

79. Any investment in Property Funds/ Corporate Bond Funds/ Asset Backed Investment Products will be subject to due diligence for each and every fund considered. The maximum amount invested in any one fund will be £20million with a maximum of £50million total for all funds.

80. The criteria for providing a pool of high quality investment counterparties (both specified and non-specified investments) is:

(a) Banks 1 - good credit quality – the Council will only use banks which:

I. Are UK banks; and/or
II. Are non-UK and domiciled in a country which has a minimum sovereign Long Term rating of AA-

and have, as a minimum, the following Fitch, Moody's and Standard & Poors credit ratings (where rated):

I. Short Term – F1
II. Long Term – A-

(b) Banks 2 – Part nationalised UK banks – Royal Bank of Scotland ring-fenced operations. These banks can be included provided they continue to be part nationalised or meet the ratings in Banks 1 above.

(c) Banks 3 – The Council's own banker for transactional purposes if the bank falls below the above criteria, although in this case balances will be minimised in both monetary size and time invested.

(d) Building societies -The Council will use all societies which meet the ratings for the banks outlined above and have assets in excess of £1,000m.

(e) Money Market Funds (MMFs) CNAV AAA
(f) Money Market Funds (MMF's) LNVAV AAA
(g) Money Market Funds (MMF's) VNAV AAA

(h) Ultra-Short Dated Bond Funds AAA

(i) UK Government (including gilts, Treasury Bills and the DMADF)

(j) Local authorities, parish councils etc

(k) Supranational institutions

(l) Housing associations

(m) Property Funds, Corporate Bond Funds and Asset Backed Investment Products.

81. A limit of £50m will be applied to the use of non-specified investments.

Use of additional information other than credit ratings

82. Additional requirements under the Code require the Council to supplement credit rating information. Whilst the above criteria relies primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information (for example Credit Default Swaps, negative rating Watches/Outlooks) will be applied to compare the relative security of differing investment counterparties.

Time and monetary limits applying to investments.

83. The time and monetary limits for institutions on the Council's counterparty list are as follows (these will cover both specified and non-specified Investments)

84. In order to determine time limits for investments the Council applies the creditworthiness service provided by Link Asset Services. This service employs a sophisticated modelling approach utlilising credit ratings from the three main credit rating agencies - Fitch, Moodys and Standard & Poors. The credit ratings of counterparties are supplemented with the following overlays:

    (a) credit watches and credit outlooks from credit rating agencies;

    (b) Credit Default Swap price spreads to give early warning of likely changes in credit ratings;

    (c) sovereign ratings to select counterparties from only the most creditworthy countries.

85. The Council will therefore use the following durational bands when applying time limits to investments

    (a) Yellow Maximum 2 years *This only relates to AAA rated government debt or its equivalent
    (b) Purple Maximum 2 years
    (c) Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
    (d) Orange 1 year
    (e) Red 6 months
    (f) Green 3 months

Table 13 – Time and monetary limits applying to investments

	Fitch Long term Rating (or equivalent)	Money Limit	Time Limit
Banks 1 high quality	AA-	£5m	Maximum of 2 years Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)
Banks 1 medium quality	A	£4m	Maximum of 1 year Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)
Banks 1 lower quality	A-	£3m	Maximum of 1 year Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)
Banks 2 category – part nationalised	N/A	£5m	Maximum of 1 years
Banks 3 category – Council's banker (not meeting Banks 1)		£3m	1 day
DMADF (Debt Management Office)	AAA	unlimited	6 months
UK Government Treasury Bills	UK sovereign rating	unlimited	Maximum of 1 year
Local authorities	N/A	£5m per Local Authority	Up to 2 years
Money market Funds (CNAV, LVNAV & VNAV) and Ultra Short Dated Bond Funds	AAA	£5m per Fund	liquid
Property Funds, Corporate Bond Funds and other Asset backed Investment products	Non Rated Due Diligence required	£20m per Fund	10 years

86. In addition to sterling deposits either on a fixed term call or notice basis deposits in banks or Building Societies which meet our criteria, may be made via certificates of deposits where appropriate.

87. The proposed criteria for Specified and Non-Specified investments are shown in Appendix 2 for approval.

88. All credit ratings will be monitored daily. The Council is alerted to changes to ratings of all three agencies through its use of the Link Asset Services creditworthiness service.

    (a) if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.

    (b) in addition to the use of credit ratings the Council will be advised of information in movements in Credit Default Swap against the iTraxx

benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

89. Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on government support for banks and the credit ratings of that government support.

Investment Strategy

In-house funds

90. 'Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping the most investments as being short term or variable.

- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

Investment returns expectations

91. On the assumption that the UK and EU agree a Brexit deal including the terms of trade by the end of 2020 or soon after, then Bank Rate is forecast to increase only slowly over the next few years to reach 1.00% by quarter 1 2023. Bank Rate forecasts for financial year ends (March) are:

(a) Q1 2021 0.75%
(b) Q1 2022 1.00%
(c) Q1 2023 1.00%

92. The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows:-

(a) 2019/20 0.75%
(b) 2020/21 0.75%
(c) 2021/22 1.00%
(d) 2022/23 1.25%
(e) 2023/24 1.50%
(f) 2024/25 1.75%
(g) Later years 2.25%

93. The overall balance of risks to economic growth in the UK is probably to the downside due to the weight of all the uncertainties over Brexit, as well as a softening global economic picture.

94. The balance of risks to increases in Bank Rate and shorter term PWLB rates are broadly similar to the downside.

95. In the event that a Brexit deal is agreed with the EU and approved by Parliament, the balance of risks to economic growth and to increases in Bank Rate is likely to change to the upside.

Investment treasury indicator and limit

96. Total principal funds invested for greater than 365 days. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.

97. The Committee is asked to approve the treasury indicator and limit: -

Table 14 – Maximum Principal sums invested

	2020/21	2021/22	2022/23
Principal sums invested greater than 365 days	£50m	£50m	£50m

98. For its cash flow generated balances, the Council will seek to utilise its instant access accounts, 30+ day notice accounts, money market funds and short-dated deposits (overnight to three months) in order to benefit from the compounding of interest.

Investment Risk Benchmarking

99. These benchmarks are simple guides to maximum risk, so they may be breached from time to time, depending on movements in interest rates and counterparty criteria. They relate to Investments that are not Property Funds. The purpose of the benchmark is that officers will monitor the current and trend position and amend the operational strategy to manage risk as conditions change. Any breach of the benchmarks will be reported, with supporting reasons in the Mid-Year or Annual Report.

100. Security - The Council's maximum security risk benchmark for the current portfolio, when compared to these historic default tables, is:

0.077% historic risk of default when compared to the whole portfolio.

101. Liquidity – in respect of this area the Council seeks to maintain:

(a) Bank overdraft - £0.100m

(b) Liquid short term deposits of at least £3.000m available with a week's notice

(c) Weighted Average Life benchmark is expected to be 1 year.

102. Yield - local measures of yield benchmarks are:

    (a) Investments – Short Term- cash flow investment rate returned against comparative interest rates

    (b) Investments – Longer term – capital investment rates returned against comparative average rates

103. And in addition that the security benchmark for each individual year is:

Table 15 - Security Benchmark

	1 year	2 years
Maximum	0.077%	0.077%

Note: This benchmark is an average risk of default measure, and would not constitute an expectation of loss against a particular investment.

104. The above reported benchmarks for Security Liquidity and Yield all relate to Deposits with Banks and Money Market Funds but would not relate to Property Funds.

105. It is proposed that property funds will be benchmarked for performance against the IPD All Balanced Fund index which is the universe of all property funds, data for this can be provided by our Treasury Management advisors Link Asset Services.

End of year investment report

106. At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

Policy on the use of external service providers

107. The Council uses Link Asset Services as its external treasury management advisors. The company provides a range of services which include:

    (a) Technical support on treasury matters, capital finance issues and the drafting of Member reports;

    (b) Economic and interest rate analysis;

    (c) Debt services which includes advice on the timing of borrowing;

    (d) Debt rescheduling advice surrounding the existing portfolio;

    (e) Generic investment advice on interest rates, timing and investment instruments;

    (f) Credit ratings from the three main rating agencies and other market information on counterparties.

108. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.

109. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

Outcome of Consultation

110. No consultation was undertaken in the production of this report.

APPENDIX 1

Economic Background provided by Link Asset Services

1. **GLOBAL OUTLOOK. World growth** has been doing reasonably well, aided by strong growth in the US. However, US growth is likely to fall back in 2019 and together with weakening economic activity in China and the eurozone, overall world growth is likely to weaken.

2. **Inflation** has been weak during 2018 but, at long last, unemployment falling to remarkably low levels in the US and UK has led to a marked acceleration of wage inflation. The US Fed has therefore increased rates nine times and the Bank of England twice. However, the ECB is unlikely to start raising rates until late in 2019 at the earliest.

3. **KEY RISKS - central bank monetary policy measures**
   Looking back on nearly ten years since the financial crash of 2008 when liquidity suddenly dried up in financial markets, it can be assessed that central banks' monetary policy measures to counter the sharp world recession were successful. The key monetary policy measures they used were a combination of lowering central interest rates and flooding financial markets with liquidity, particularly through unconventional means such as Quantitative Easing (QE), where central banks bought large amounts of central government debt and smaller sums of other debt.

4. The key issue now is that that period of stimulating economic recovery and warding off the threat of deflation is coming towards its close. A new period is well advanced in the US, and started more recently in the UK, of reversing those measures i.e. by raising central rates and (for the US) reducing central banks' holdings of government and other debt. These measures are now required in order to stop the trend of a reduction in spare capacity in the economy, and of unemployment falling to such low levels that the re-emergence of inflation is viewed as a major risk. It is, therefore, crucial that central banks get their timing right and do not cause shocks to market expectations that could destabilise financial markets. In particular, a key risk is that because QE-driven purchases of bonds drove up the price of government debt, and therefore caused a sharp drop in income yields, this also encouraged investors into a search for yield and into investing in riskier assets such as equities. Consequently, prices in both bond and equity markets rose to historically high valuation levels simultaneously. This meant that both asset categories were exposed to the risk of a sharp downward correction and we have indeed, seen a sharp fall in equity values in the last quarter of 2018. It is important, therefore, that central banks only gradually unwind their holdings of bonds in order to prevent destabilising the financial markets. It is also likely that the timeframe for central banks unwinding their holdings of QE debt purchases will be over several years. They need to balance their timing to neither squash economic recovery, by taking too rapid and too strong action, or, conversely, let inflation run away by taking action that was too slow and/or too weak. **The potential for central banks to get this timing and strength of action wrong are now key risks.** At the time of writing, (early January 2019), financial markets are very concerned that the Fed is being too aggressive with its policy for raising interest rates and was likely to cause a recession in the US economy

5. The world economy also needs to adjust to a sharp change in liquidity creation over the last five years where the US has moved from boosting liquidity by QE purchases,

to reducing its holdings of debt, (currently about $50bn per month). In addition, the European Central Bank ended QE purchases in December 2018.

6. **UK**. The flow of positive economic statistics since the end of the first quarter of 2018 has shown that pessimism was overdone about the poor growth in quarter 1 when adverse weather caused a temporary downward blip. Quarter 1 at 0.1% growth in GDP was followed by a return to 0.4% in quarter 2 and by a strong performance in quarter 3 of +0.6%. However, growth in quarter 4 is expected to weaken significantly.

7. At their November quarterly inflation meeting, the MPC repeated their well-worn phrase that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, (where monetary policy is neither expansionary of contractionary), than before the crash; indeed they gave a figure for this of around 2.5% in ten years time but declined to give a medium term forecast. However, with so much uncertainty around Brexit, they warned that the next move could be up or down, even if there was a disorderly Brexit. While it would be expected that Bank Rate could be cut if there was a significant fall in GDP growth as a result of a disorderly Brexit, so as to provide a stimulus to growth, they warned they could also raise Bank Rate in the same scenario if there was a boost to inflation from a devaluation of sterling, increases in import prices and more expensive goods produced in the UK replacing cheaper goods previously imported, and so on. In addition, the Chancellor could potentially provide fiscal stimulus to support economic growth, though at the cost of increasing the budget deficit above currently projected levels.

8. It is unlikely that the MPC would increase Bank Rate in February 2019, ahead of the deadline in March for Brexit. Getting parliamentary approval for a Brexit agreement on both sides of the Channel will take well into spring 2019. However, in view of the hawkish stance of the MPC at their November meeting, the next increase in Bank Rate is now forecast to be in May 2019 (on the assumption that a Brexit deal is agreed by both the UK and the EU). The following increases are then forecast to be in February and November 2020 before ending up at 2.0% in February 2022.

9. **Inflation**. The Consumer Price Index (CPI) measure of inflation has been falling from a peak of 3.1% in November 2017 to 2.3% in November 2018. In the November Bank of England quarterly inflation report, inflation was forecast to still be marginally above its 2% inflation target two years ahead, (at about 2.1%), given a scenario of minimal increases in Bank Rate. This inflation forecast is likely to be amended upwards due to the Bank's report being produced prior to the Chancellor's announcement of a significant fiscal stimulus in the Budget; this is likely to add 0.3% to GDP growth at a time when there is little spare capacity left in the economy, particularly of labour.

10. As for the labour market figures in October 2018, unemployment at 4.1% was marginally above a 43 year low of 4% on the Independent Labour Organisation measure. A combination of job vacancies hitting an all-time high in July, together with negligible growth in total employment numbers, indicates that employers are now having major difficulties filling job vacancies with suitable staff. It was therefore unsurprising that wage inflation picked up to 3.3%, (3 month average regular pay, excluding bonuses). This meant that in real terms, (i.e. wage rates less CPI inflation), earnings are currently growing by about 1.0%, the highest level since 2009. This increase in household spending power is likely to feed through into providing some support to the overall rate of economic growth in the coming months. This

tends to confirm that the MPC was right to start on a cautious increase in Bank Rate in August as it views wage inflation in excess of 3% as increasing inflationary pressures within the UK economy.

11. In the political arena, there is a risk that the current Conservative minority government may be unable to muster a majority in the Commons over Brexit. However, our central position is that Prime Minister May's government will endure, despite various setbacks, along the route to reaching an orderly Brexit in March 2019. If, however, the UK faces a general election in the next 12 months, this could result in a potential loosening of monetary and fiscal policy and therefore medium to longer dated gilt yields could rise on the expectation of a weak pound and concerns around inflation picking up.

12. **USA**. President Trump's massive easing of fiscal policy is fuelling a, (temporary), boost in consumption which has generated an upturn in the rate of strong growth which rose from 2.2%, (annualised rate), in quarter 1 to 4.2% in quarter 2 and 3.5%, (3.0% y/y), in quarter 3, but also an upturn in inflationary pressures. The strong growth in employment numbers and the reduction in the unemployment rate to 3.9%, near to a recent 49 year low, has fed through to an upturn in wage inflation which hit 3.2% in November, however, CPI inflation overall fell to 2.2% in November and looks to be on a falling trend to drop below the Fed's target of 2% during 2019. The Fed has continued on its series of increases in interest rates with another 0.25% increase in December to between 2.25% and 2.50%, this being the fifth increase in 2018 and the ninth in this cycle. However, they did also reduce their forecast for further increases from three to two. This latest increase compounded investor fears that the Fed is over doing the rate and level of increases in rates and that it is going to cause a US recession as a result. There is also much evidence in previous monetary policy cycles, of the Fed's series of increases doing exactly that. Consequently, we have seen stock markets around the world plunging under the weight of fears around the Fed's actions, the trade war between the US and China, an expectation that world growth will slow, Brexit etc.

13. The tariff war between the US and China has been generating a lot of heat during 2018, but it is not expected that the current level of actual action would have much in the way of a significant effect on US or world growth. However, there is a risk of escalation if an agreement is not reached soon between the US and China. The results of the mid-term elections are not expected to have a material effect on the economy.

14. **Eurozone**. Growth was 0.4% in quarters 1 and 2 but fell back to 0.2% in quarter 3, though this was probably just a temporary dip. In particular, data from Germany has been mixed and it could be negatively impacted by US tariffs on a significant part of manufacturing exports e.g. cars. For that reason, although growth is still expected to be in the region of nearly 2% for 2018, the horizon is less clear than it seemed just a short while ago. Having halved its quantitative easing purchases of debt in October 2018 to €15bn per month, the European Central Bank ended all further purchases in December 2018. The ECB is forecasting inflation to be a little below its 2% top limit through the next three years so it may find it difficult to warrant a start on raising rates by the end of 2019 if the growth rate of the EU economy is on a weakening trend.

15. **China**. Economic growth has been weakening over successive years, despite repeated rounds of central bank stimulus; medium term risks are increasing. Major progress still needs to be made to eliminate excess industrial capacity and the stock

of unsold property, and to address the level of non-performing loans in the banking and credit systems. Progress has been made in reducing the rate of credit creation, particularly from the shadow banking sector, which is feeding through into lower economic growth. There are concerns that official economic statistics are inflating the published rate of growth.

16. **Japan** - has been struggling to stimulate consistent significant GDP growth and to get inflation up to its target of 2%, despite huge monetary and fiscal stimulus. It is also making little progress on fundamental reform of the economy. It is likely that loose monetary policy will endure for some years yet to try to stimulate growth and modest inflation.

17. **Emerging countries.** Argentina and Turkey are currently experiencing major headwinds and are facing challenges in external financing requirements well in excess of their reserves of foreign exchange. However, these countries are small in terms of the overall world economy, (around 1% each), so the fallout from the expected recessions in these countries will be minimal.

INTEREST RATE FORECASTS

18. The interest rate forecasts provided by Link Asset Services in paragraph 3.2 are predicated on an assumption of an agreement being reached on Brexit between the UK and the EU. In the event of an orderly non-agreement exit, it is likely that the Bank of England would take action to cut Bank Rate from 0.75% in order to help economic growth deal with the adverse effects of this situation. This is also likely to cause short to medium term gilt yields to fall. If there was a disorderly Brexit, then any cut in Bank Rate would be likely to last for a longer period and also depress short and medium gilt yields correspondingly. It is also possible that the government could act to protect economic growth by implementing fiscal stimulus.

19. The balance of risks to the UK
    - The overall balance of risks to economic growth in the UK is probably neutral.
    - The balance of risks to increases in Bank Rate and shorter term PWLB rates, are probably also even and are broadly dependent on how strong GDP growth turns out, how slowly inflation pressures subside, and how quickly the Brexit negotiations move forward positively.

20. One risk that is both an upside and downside risk, is that all central banks are now working in very different economic conditions than before the 2008 financial crash as there has been a major increase in consumer and other debt due to the exceptionally low levels of borrowing rates that have prevailed for ten years since 2008. This means that the neutral rate of interest in an economy, (i.e. the rate that is neither expansionary nor deflationary), is difficult to determine definitively in this new environment, although central banks have made statements that they expect it to be much lower than before 2008. Central banks could therefore either over or under do increases in central interest rates.

21. **Downside risks to current forecasts for UK gilt yields and PWLB rates currently include:**
    - Brexit – if it were to cause significant economic disruption and a major downturn in the rate of growth.

- Bank of England monetary policy takes action too quickly, or too far, over the next three years to raise Bank Rate and causes UK economic growth, and increases in inflation, to be weaker than we currently anticipate.
- A resurgence of the Eurozone sovereign debt crisis, possibly in Italy, due to its high level of government debt, low rate of economic growth and vulnerable banking system, and due to the election in March of a government which has made a lot of anti-austerity noise. The EU rejected the initial proposed Italian budget and demanded cuts in government spending which the Italian government has refused. However, a fudge was subsequently agreed but only by delaying the planned increases in expenditure to a later year. The rating agencies have started on downgrading Italian debt to one notch above junk level. If Italian debt were to fall below investment grade, many investors would be unable to hold it. Unsurprisingly, investors are becoming increasingly concerned by the words and actions of the Italian government and consequently, Italian bond yields have risen – at a time when the government faces having to refinance large amounts of debt maturing in 2019.
- Weak capitalisation of some European banks. Italian banks are particularly vulnerable; one factor is that they hold a high level of Italian government debt - debt which is falling in value. This is therefore undermining their capital ratios and raises the question of whether they will need to raise fresh capital to plug the gap.
- **German minority government**. In the German general election of September 2017, Angela Merkel's CDU party was left in a vulnerable minority position dependent on the fractious support of the SPD party, as a result of the rise in popularity of the anti-immigration AfD party. Then in October 2018, the results of the Bavarian and Hesse state elections radically undermined the SPD party and showed a sharp fall in support for the CDU. As a result, the SPD is reviewing whether it can continue to support a coalition that is so damaging to its electoral popularity. After the result of the Hesse state election, Angela Merkel announced that she would not stand for re-election as CDU party leader at her party's convention in December 2018. However, this makes little practical difference as she is still expected to aim to continue for now as the Chancellor. However, there are five more state elections coming up in 2019 and EU parliamentary elections in May/June; these could result in a further loss of electoral support for both the CDU and SPD which could also undermine her leadership.
- **Other minority eurozone governments**. Spain, Portugal, Ireland, Netherlands and Belgium all have vulnerable minority governments dependent on coalitions which could prove fragile. Sweden is also struggling to form a government due to the anti-immigration party holding the balance of power, and which no other party is willing to form a coalition with. The Belgian coalition collapsed in December 2018 but a minority caretaker government has been appointed until May EU wide general elections.
- **Austria, the Czech Republic and Hungary** now form a strongly anti-immigration bloc within the EU while Italy, this year, has also elected a strongly anti-immigration government. Elections to the EU parliament are due in May/June 2019.
- Further increases in interest rates in the US could spark a sudden flight of investment funds from more risky assets e.g. shares, into bonds yielding a

much improved yield. Throughout the last quarter of 2018, we saw a sharp fall in equity markets but this has been limited, as yet. Emerging countries which have borrowed heavily in dollar denominated debt, could be particularly exposed to this risk of an investor flight to safe havens e.g. UK gilts.

- There are concerns around the level of US corporate debt which has swollen massively during the period of low borrowing rates in order to finance mergers and acquisitions. This has resulted in the debt of many large corporations being downgraded to a BBB credit rating, close to junk status. Indeed, 48% of total investment grade corporate debt is now rated at BBB. If such corporations fail to generate profits and cash flow to reduce their debt levels as expected, this could tip their debt into junk ratings which will increase their cost of financing and further negatively impact profits and cash flow.
- Geopolitical risks, especially North Korea, but also in Europe and the Middle East, which could lead to increasing safe haven flows**.**

22. **Upside risks to current forecasts for UK gilt yields and PWLB rates**

- **Brexit** – if both sides were to agree a compromise that removed all threats of economic and political disruption.
- **The Fed causing a sudden shock in financial markets** through misjudging the pace and strength of increases in its Fed. Funds Rate and in the pace and strength of reversal of QE, which then leads to a fundamental reassessment by investors of the relative risks of holding bonds, as opposed to equities. This could lead to a major flight from bonds to equities and a sharp increase in bond yields in the US, which could then spill over into impacting bond yields around the world.
- The **Bank of England is too slow** in its pace and strength of increases in Bank Rate and, therefore, allows inflation pressures to build up too strongly within the UK economy, which then necessitates a later rapid series of increases in Bank Rate faster than we currently expect.
- **UK inflation,** whether domestically generated or imported, returning to sustained significantly higher levels causing an increase in the inflation premium inherent to gilt yields.

Appendix 2

Treasury Management Practice (TMP1) – Credit and Counterparty Risk Management

1. The MHCLG issued Investment Guidance in 2018, and this forms the structure of the Council's policy below. These guidelines do not apply to either trust funds or pension funds which operate under a different regulatory regime.

2. The key intention of the Guidance is to maintain the current requirement for Councils to invest prudently, and that priority is given to security and liquidity before yield. In order to facilitate this objective the guidance requires this Council to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes. This Council adopted the Code on 21st March 2002 and will apply its principles to all investment activity. In accordance with the Code, the Assistant Director Resources has produced its Treasury Management Practices (TMPs). This part, TMP 1(1), covering investment counterparty policy requires approval each year.

Annual Investment Strategy

3. The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of its annual treasury strategy for the following year, covering the identification and approval of the following:

    a) The strategy guidelines for choosing and placing investments, particularly non-specified investments.

    b) The principles to be used to determine the maximum periods for which funds can be committed.

    c) Specified investments that the Council will use. These are high security (i.e. high credit rating, although this is defined by the Council, and no guidelines are given), and high liquidity investments in sterling and with a maturity of no more than a year.

    d) Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

4. The investment policy proposed for the Council is:

Strategy Guidelines

5. The main strategy guidelines are contained in the body of the treasury strategy statement.

All Investments

6. The criteria for providing a pool of high quality investment counterparties (both Specified and Non-specified investments) is:

   (a) Banks 1 - good credit quality – the Council will only use banks which:

      i. are UK banks; and have, as a minimum, the following Fitch, Moody's and Standard and Poors credit ratings (where rated):
         a. Fitch Short Term equivalent – F1
         b. Fitch Long term equivalent – A-

   (b) Banks 2 Non UK banks based on the following very high quality criteria using a lowest common denominator approach and only where sovereign ratings are AAA.

         a. Fitch Short Term equivalent – F1+
         b. Fitch Long Term equivalent – AA-

   (c) Banks 3 – Part nationalised UK banks – Lloyds Bank Group and Royal Bank of Scotland. These banks can be included if they continue to be part nationalised or they meet the ratings in Banks 1 above.

   (d) Banks 4 – The Council's own banker for transactional purposes if the bank falls below the above criteria, although in this case balances will be minimised in both monetary size and time.

   (e) Building societies The Council will use all societies which:

      i. meet the ratings for banks outlined above and have assets in excess of £1,000m

   (f) Money Market Funds (CNAV, LVNAV & VNAV) AAA

   (g) Ultra Short Dated Bond Funds AAA

   (h) UK Government (including gilts Treasury Bills and the Debt Management Office)

   (i) Local authorities, parish councils etc.

   (j) Supranational institutions

   (k) Property Funds ,Corporate Bond Funds and Asset Backed Investment Products

7. A limit of £50M will be applied to the use of Non-Specified investments.

Specified Investments

8. These investments are sterling investments of not more than one-year maturity, or those which could be for a longer period but where the Council has the right to be repaid within 12 months if it wishes. These are considered low risk assets where the possibility of loss of principal or investment income is small. These would include sterling investments which would not be defined as capital expenditure with:

   (a) The UK Government (such as the Debt Management Account deposit facility, UK Treasury Bills or a Gilt with less than one year to maturity).
   (b) Supranational bonds of less than one year's duration.
   (c) A local authority, housing association, parish council or community council.
   (d) Pooled investment vehicles (such as money market funds) that have been awarded a high credit rating by a credit rating agency. For category f. above, this covers pooled investment vehicles, such as money market funds, rated AAA by Standard and Poor's, Moody's and/or Fitch rating agencies.
   (e) A body that is considered of a high credit quality (such as a bank or building society). For category a and b this covers bodies with a minimum short term rating of F1 (or the equivalent) as rated by Standard and Poor's, Moody's and/or Fitch rating agencies.

9. Within these bodies, and in accordance with the Code, the Council has set additional criteria to set the time and amount of monies which will be invested in these bodies. These criteria are:

	Fitch Long term Rating (or equivalent)	Money Limit	Time Limit
Banks 1 category high quality	**AA-**	**£5M**	**Maximum of 2 years Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)**
Banks 1 category medium quality	**A**	**£4M**	**Maximum of 1 year Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)**
Banks 1 category lower quality	**A-**	**£3M**	**Maximum of 1 year Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)**
Banks 2 Non UK (only where sovereign ratings are AAA)	**AA-**	**£3M**	**Maximum of 1 year Suggested duration using Link Asset Services colour coding (CDS adjusted with manual override)**
Banks 3 category – part nationalised	**N/A**	**£5M**	**Maximum of 1 year**
Banks 4 category – Council's banker (not meeting Banks 1,2 and3)		**£3M**	**1 day**
DMADF (Debt Management Office)	**AAA**	**unlimited**	**6 months**
Local authorities	**N/A**	**£5M per Local Authority**	**Up to 1 years**
Money market Funds (CNAV, LVNAV & VNAV) and Ultra Short Dated Bond Funds	**AAA**	**£5M per Fund**	**liquid**

10. The Council will therefore use the following durational bands supplied by Link Asset Service's creditworthiness service when applying time limits to investments

    a. Yellow Maximum 2 years *This only relates to AAA rated government debt or its equivalent
    b. Purple Maximum 2 years
    c. Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
    d. Orange 1 year
    e. Red 6 months
    f. Green 3 months

Non-Specified Investments

11. Non-specified investments are any other type of investment (i.e. not defined as Specified above). The identification and rationale supporting the selection of these other investments and the maximum limits to be applied are set out below. Non specified investments would include any sterling investments with:

	Non Specified Investment Category	Limit (£ or %)
a.	**Supranational Bonds greater than 1 year to maturity** **(a) Multilateral development bank bonds** - These are bonds defined as an international financial institution having as one of its objects economic development, either generally or in any region of the world (e.g. European Reconstruction and Development Bank etc.). **(b) A financial institution that is guaranteed by the United Kingdom Government** (e.g. National Rail, The Guaranteed Export Finance Company {GEFCO}) The security of interest and principal on maturity is on a par with the Government and so very secure. These bonds usually provide returns above equivalent gilt edged securities. However the value of the bond may rise or fall before maturity and losses may accrue if the bond is sold before maturity.	AAA long term ratings
b.	**Gilt edged securities** with a maturity of greater than one year. These are Government bonds and so provide the highest security of interest and the repayment of principal on maturity. Similar to category (a) above, the value of the bond may rise or fall before maturity and losses may accrue if the bond is sold before maturity.	
c.	**The Council's own banker** if it fails to meet the basic credit criteria. In this instance balances will be minimised as far as is possible.	£3m
d.	**Building societies not meeting the basic security requirements under the specified investments**. The operation of some building societies does not require a credit rating, although in every other respect the security of the society would match similarly sized societies with ratings.	£5m
e.	Any **bank or building society** that has a minimum long term credit rating of AA-, for deposits with a maturity of greater than one year (including forward deals in excess of one year from inception to repayment).	£5m
f.	**Local Authorities**	£5m per authority
g.	**Property Funds, Corporate Bond Funds and Other Asset backed Investment products** The use of these instruments can be deemed to be capital expenditure, and as such will be an application (spending) of capital resources. This Authority will seek guidance on the status of any fund it may consider using	£20m per Fund

12. Within categories c and d, and in accordance with the Code, the Council has developed additional criteria to set the overall amount of monies which will be

invested in these bodies. Time limits will be applied to banks using the creditworthiness service provided by Link Asset Services. And for part-nationalised banks will be up to 2 years.

13. Time limits for Property Funds, Corporate Bond Funds and Asset Backed Investment Products will be up to 10 Years, Local Authorities up to 2 years.

The Monitoring of Investment Counterparties

14. The credit rating of counterparties will be monitored regularly. The Council receives credit rating information (changes, rating watches and rating outlooks) from Link Asset Services as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by the Assistant Director Resources, and if required new counterparties which meet the criteria will be added to the list.

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SPECIAL COUNCIL
20 FEBRUARY 2020

ITEM NO. 9

SETTING THE COUNCIL TAX FOR 2020/21

Responsible Cabinet Member – Councillor Charles Johnson, Resources Portfolio

Responsible Director – Paul Wildsmith, Managing Director

SUMMARY REPORT

Purpose of the Report

1. The Local Government Finance Act 1992, as amended (referred to as "the Act" in this report) requires the Council to calculate and set its council tax for 2020/21 before 11 March 2020.

Summary

2. The Localism Act 2011 made significant changes to the Act and requires the billing authority to calculate a Council Tax requirement for the year.

3. The budget recommended to Council by Cabinet on 11 February 2020 will result in Band D council tax of £1,565.56, if approved by Council. The Office of the Durham Police, Crime and Victims' Commissioner has set its Band D council tax for 2020/21 at £215.24. County Durham and Darlington Fire and Rescue Service is expected to set its Band D council tax for 2020/21 at £105.48. Therefore the recommended council tax for a Band D property will be £1,886.28 which is an overall increase of 3.96%. There will also be an additional council tax in any parish where a precept has been issued.

4. The Council has calculated that the Council Tax requirement is £52,357,909 which includes Parish Precepts of £178,909. The Council Tax requirement for the Council's own purposes for 2020/21 (excluding Parish Precepts) is therefore £52,179,000.

Recommendation

5. It is recommended that

   (a) the following amounts be calculated by the Council for 2020/21 in accordance with sections 31 to 36 of the Act and relevant regulations:-

(i)	the aggregate of the amount which the Council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by Parish Councils, which is its expenditure	£216,772,909
(ii)	the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3) of the Act, which is its income	£164,415,000
(iii)	the amount by which (i) exceeds (ii) calculated by the Council for the year in accordance with Section 31A(4) of the Act as its Council Tax Requirement	£52,357,909
(iv)	The amount at item 5(iii) above, divided by the council tax base in paragraph 13 below, calculated by the Council in accordance with Section 31B of the Act as the basic amount of its Council Tax for the year (including Parish Precepts)	£1,570.93
(v)	the aggregate of all special items (Parish Precepts) referred to in Section 34(1) of the Act as in the attached **Appendix 1**	£178,909
(vi)	the amount at 5(iv) above less the result given by dividing the amount at 5(v) above by the amount at paragraph 13 below, calculated by the Council in accordance with Section 34(2) of the Act as the basic amount of its Council Tax for the year for dwellings in those parts of its area to which no Parish Precept relates	£1,565.56
(vii)	That the basic council tax for 2020/21 calculated for dwellings in those areas that have parish precepts be as set out in **Appendix 1**, column 5	
(viii)	That the Council, in accordance with Sections 30 and 36 of the Act, hereby sets the aggregate amounts shown in **Appendix 2** as the amount of Council Tax for 2020/21 for each part of its area and for each of the categories of dwellings	

(b) It be noted that for the year 2020/21 The Office of the Durham Police, Crime and Victims' Commissioner has stated the following amounts in the precept issued to the Council, in accordance with Section 40 of the Act, for each of the categories of dwellings shown : -

	A	B	C	D	E	F	G	H
	£ p	£ p	£ p	£ p	£ p	£ p	£ p	£ p
Police Authority	143.49	167.41	191.32	215.24	263.07	310.90	358.73	430.48

(c) It be noted that for the year 2020/21 County Durham and Darlington Fire and Rescue Service has stated the following amounts in the precept issued to the Council, in accordance with Section 40 of the Act, for each of the categories of dwellings shown: -

	A	B	C	D	E	F	G	H
	£ p	£ p	£ p	£ p	£ p	£ p	£ p	£ p
Fire Authority	70.32	82.04	93.76	105.48	128.92	152.36	175.80	210.96

(d) The Council, in accordance with Section 30(2) of the Act hereby sets the amounts set out in **Appendix 3** as the amounts of council tax for 2020/21 for each of the categories of dwellings.

Reasons

6. The recommendations are supported to set the Council Tax for the Council's area in accordance with statutory requirements.

Paul Wildsmith
Managing Director

Background Papers

(i) Local Government Finance Settlement 2020/21
(ii) Police Authority Precept notification.
(iii) Fire Authority Precept notification.
(iv) Parish Council Precept notifications.

Elizabeth Davison: Extension 5830

S17 Crime and Disorder	The report does not contain any Crime and Disorder implications
Health and Well Being	The report does not contain any proposals relating to the health and well being of residents
Carbon Impact and Climate Change	There are no carbon impact or climate change implications in this report
Diversity	There are no diversity implications in this report
Wards Affected	All Wards are affected equally
Groups Affected	All Groups are affected equally
Budget and Policy Framework	This report must be considered by Council
Key Decision	This report must be considered by Council
Urgent Decision	The Council's Medium Term Financial Plan, Budget and Council Tax require approval by full Council
One Darlington: Perfectly Placed	This report follows from the Corporate Plan and Financial Plan and budget reports, which specifically addresses key issues involved in the Council's contribution to delivering the Sustainable Community Strategy vision.
Efficiency	There are no efficiency implications in this report
Impact on Looked After Children and Care Leavers	This report does not affect Looked After Children and Care Leavers

MAIN REPORT

Information and Analysis

7. The Act, as amended by the Localism Act 2011, requires authorities to calculate their Council Tax requirement for the year. The Council tax requirement is equal to the Council's net budget requirement less Settlement Funding Assessment (Revenue Support Grant, Top Up Grant and General Government Grants) less any contribution to the Collection Fund in respect of any prior year's deficit or plus any contribution from the Collection Fund in respect of any prior year's surplus. The details of these calculations are set out in paragraph 5(i) to (iii) above.

8. The recommended basic council tax including Fire and Police Precepts for a Band D property is £1,886.28. There will also be an additional council tax in any parish where a precept has been issued.

9. Cabinet considered the draft Medium Term Financial Plan (MTFP) on 7 January 2020 and approved it for consultation. After public consultation and review by the relevant Scrutiny Committees, Cabinet considered the MTFP again on 11 February 2020.

10. The Council also has to determine the estimated surplus or deficit on its Collection Fund at 31st March 2020. The estimated surplus/deficit for the council tax is

shared between this Council, the Police Authority and the Fire Authority in proportion to the 2019/20 demands/precepts. It is estimated that there will be a deficit on the Collection Fund at 31st March 2020 of £482,000 of which Darlington's share is £400,000.

11. The Council has determined that its basic amount of Council Tax for 2020/21, excluding Parish Precepts, is not excessive in accordance with principles approved under Section 52ZB of the Act.

12. The Council's Council Tax Requirement (including Parish Precepts) for council tax purposes for 2020/21, as calculated in accordance with Section 31A(4) of the Act, is £52,357,909.

The Council Tax Calculations

Basic Council Tax

13. The Council set its tax base at 33,329.3 at the meeting on 30 January 2020 along with the tax bases for various parish councils. These are shown in **Appendix 1** (column 2).

14. The basic council tax must first be calculated by dividing the Council Tax requirement by the approved tax base as follows:-

$$\frac{£52,357,909}{33,329.3} = £1,570.93$$

15. From this figure parish precepts, which the Act refers to as special items, are deducted as follows:-

$$\frac{£178,909}{33,329.3} = £5.37$$

16. The basic council tax for those areas of the Borough Council where there are no special items is, therefore, £1,565.56 (£1,570.93 - £5.37). This also excludes the Police Authority and Fire Service precepts. It represents a 3.99% increase compared with the council tax in 2019/20. It was announced in the 2020/21 provisional local government finance settlement on 20 December, 2019 and it was confirmed in the final Local Government Finance Report 2020/21 on 6 February, 2020 that councils could increase their core council tax charge by up to 4% without the need for a referendum, inclusive of 2% for adult social care expenditure.

Parish Council Taxes

17. The calculation of the additional tax for areas where special items apply, i.e. parish precepts, is based on the precepts submitted by each parish council and parish meeting divided by the tax base approved at the Council meeting on 30 January 2020. The Parish Council Precepts for 2020/21 are detailed in Appendix 1 and total £178,909.

18. The council tax in relation to the parish precepts is shown in **Appendix 1** (column 3). When added to the basic council tax, as calculated in paragraph 14, this provides the Billing Authority's basic council tax for each parish area (**Appendix 1,** column 5).

Billing Authority Council Tax

19. Section 30(1) of the Act requires a council tax to be set for each category of dwelling for its area. This is the Billing Authority's council tax for each parish area and the basic council tax for the rest of the authority's area, multiplied by the ratio of each band using the following: -

Band	A	B	C	D	E	F	G	H
Proportion	6/9	7/9	8/9	9/9	11/9	13/9	15/9	18/9

20. The council tax set will relate to band D which is 9/9 or 1. For other bands the above proportions will apply. For example, Band A properties will be charged 6/9 or two thirds of the Band D tax whilst band H will be charged double the Band D tax.

21. The Billing Authority's council taxes for each band of property are shown in **Appendix 2**.

Police and Fire Authority Council Taxes

22. The Office of the Durham Police, Crime and Victims' Commissioner is a separate body responsible for its own financial affairs. The Authority met on 06 February 2020 and set their precept at £7,173,799. This results in a Band D Council Tax of £215.24, a 4.87% increase from 2019/20 as shown below:-

	A £ p	B £ p	C £ p	D £ p	E £ p	F £ p	G £ p	H £ p
Police Authority	143.49	167.41	191.32	215.24	263.07	310.90	358.73	430.48

23. County Durham and Darlington Fire and Rescue Service meet on 25 February 2020 and are expected to set their precept at £3,515,574.56. This will result in a Band D Council Tax of £105.48, a 1.91% increase from 2019/20.

	A £ p	B £ p	C £ p	D £ p	E £ p	F £ p	G £ p	H £ p
Fire Authority	70.32	82.04	93.76	105.48	128.92	152.36	175.80	210.96

Overall Council Tax

24. The total council tax for each of the parish areas and the remaining area of the Borough is calculated by adding the charges for the Billing Authority to those of the Police Authority and the Fire and Rescue Service. The overall council tax for each category of dwelling in each parish area and the remaining areas of the Borough where there are no parish precepts is set out in **Appendix 3**. There is a 3.99% increase in the Billing Authority Council Tax next year, with changes in the amounts of some parish precepts. The Office of the Durham Police, Crime and Victims' Commissioner has increased its Council tax by 4.87% and the Fire and Rescue Service is expected to increase its Council Tax by 1.91%.

Consultation

25. The content of this report was not subject to consultation. Extensive consultation has, however, taken place with a wide range of stakeholders, during which all households in the Borough have had the opportunity to comment, in preparing the Corporate Plan and Medium Term Financial Plan. The outcomes of consultation are included in those plans.

APPENDIX 1

COUNCIL TAX FOR PARISH AUTHORITIES 2020/21

	Precept payable to Parish Council (1) £	Parish Tax Base (2)	Parish Council Tax (3) £ p	Basic Council Tax (4) £ p	Billing Authority's Council Tax (5) £ p
Bishopton	7,868	172.90	45.51	1,565.56	1,611.07
Heighington	20,270	956.70	21.19	1,565.56	1,586.75
High Coniscliffe	4,000	110.10	36.33	1,565.56	1,601.89
Hurworth	59,000	1,273.00	46.35	1,565.56	1,611.91
Low Coniscliffe / Merrybent	12,600	308.10	40.90	1,565.56	1,606.46
Middleton St. George	46,086	1,876.10	24.56	1,565.56	1,590.12
Neasham	8,034	245.10	32.78	1,565.56	1,598.34
Piercebridge	1,512	64.80	23.33	1,565.56	1,588.89
Sadberge	14,000	282.40	49.58	1,565.56	1,615.14
Whessoe	5,539	540.30	10.25	1,565.56	1,575.81
	178,909	**5,829.50**			

APPENDIX 2

BILLING AUTHORITY'S COUNCIL TAXES FOR EACH PROPERTY BAND 2020/21

	A £ p	B £ p	C £ p	D £ p	E £ p	F £ p	G £ p	H £ p
Bishopton	1,074.05	1,253.06	1,432.06	1,611.07	1,969.08	2,327.10	2,685.12	3,222.14
Heighington	1,057.84	1,234.14	1,410.45	1,586.75	1,939.36	2,291.97	2,644.59	3,173.50
High Coniscliffe	1,067.93	1,245.92	1,423.90	1,601.89	1,957.86	2,313.84	2,669.82	3,203.78
Hurworth	1,074.61	1,253.71	1,432.81	1,611.91	1,970.11	2,328.31	2,686.52	3,223.82
Low Coniscliffe / Merrybent	1,070.98	1,249.47	1,427.97	1,606.46	1,963.45	2,320.44	2,677.44	3,212.92
Middleton St. George	1,060.08	1,236.76	1,413.44	1,590.12	1,943.48	2,296.84	2,650.20	3,180.24
Neasham	1,065.56	1,243.16	1,420.75	1,598.34	1,953.52	2,308.71	2,663.90	3,196.68
Piercebridge	1,059.26	1,235.81	1,412.35	1,588.89	1,941.97	2,295.06	2,648.15	3,177.78
Sadberge	1,076.76	1,256.22	1,435.68	1,615.14	1,974.06	2,332.98	2,691.90	3,230.28
Whessoe	1,050.54	1,225.63	1,400.72	1,575.81	1,925.99	2,276.17	2,626.35	3,151.62
All other parts of the Council's area	1,043.71	1,217.66	1,391.61	1,565.56	1,913.46	2,261.36	2,609.27	3,131.12

APPENDIX 3

OVERALL COUNCIL TAX FOR EACH PROPERTY BAND 2020/21

	A £ p	B £ p	C £ p	D £ p	E £ p	F £ p	G £ p	H £ p
Bishopton	1,287.86	1,502.51	1,717.14	1,931.79	2,361.07	2,790.36	3,219.65	3,863.58
Heighington	1,271.65	1,483.59	1,695.53	1,907.47	2,331.35	2,755.23	3,179.12	3,814.94
High Coniscliffe	1,281.74	1,495.37	1,708.98	1,922.61	2,349.85	2,777.10	3,204.35	3,845.22
Hurworth	1,288.42	1,503.16	1,717.89	1,932.63	2,362.10	2,791.57	3,221.05	3,865.26
Low Coniscliffe / Merrybent	1,284.79	1,498.92	1,713.05	1,927.18	2,355.44	2,783.70	3,211.97	3,854.36
Middleton St. George	1,273.89	1,486.21	1,698.52	1,910.84	2,335.47	2,760.10	3,184.73	3,821.68
Neasham	1,279.37	1,492.61	1,705.83	1,919.06	2,345.51	2,771.97	3,198.43	3,838.12
Piercebridge	1,273.07	1,485.26	1,697.43	1,909.61	2,333.96	2,758.32	3,182.68	3,819.22
Sadberge	1,290.57	1,505.67	1,720.76	1,935.86	2,366.05	2,796.24	3,226.43	3,871.72
Whessoe	1,264.35	1,475.08	1,685.80	1,896.53	2,317.98	2,739.43	3,160.88	3,793.06
All other parts of the Council's area	1,257.52	1,467.11	1,676.69	1,886.28	2,305.45	2,724.62	3,143.80	3,772.56

SPECIAL COUNCIL
20 FEBRUARY 2020

PAY POLICY STATEMENT 2020/2021

Responsible Cabinet Member -
Councillor Charles Johnson - Resources Portfolio

Responsible Director - Paul Wildsmith, Managing Director

SUMMARY REPORT

Purpose of the Report

1. To present the Pay Policy Statement for the financial year 2020/2021 in line with the requirements of the Localism Act 2011 and Local Government Transparency Code 2014 and request members approve it.

Summary

2. The Localism Act 2011 requires the Council to agree a written Pay Policy on an annual basis.

3. The Act requires the Council to publish specific information relating to the Council's highest and lowest paid employees.

4. The proposed Pay Policy for 2020/21 is attached at **Appendix A** and meets the requirements of the Localism Act 2011 and associated guidance

Recommendation

5. It is recommended that Council agree and approve the proposed Pay Policy 2020/21 (Appendix A). If approved, arrangements will be made to publish the Policy on the Council's intranet for public access.

Reasons

6. The recommendation is supported to enable the Council to comply with the requirements of the Localism Act 2011.

Paul Wildsmith
Managing Director

Background Papers

(i) Localism Act 2011
(ii) Openness and accountability in local pay: Guidance under section 40 of the Localism Act 2011 published by the Department for Communities and Local Government: February 2012
(iii) Improving Local Government Transparency Consultation published by the Department for Communities and Local Government: October 2012
(iv) Supplementary guidance to The Localism Act requirements (Openness and accountability in local pay : Guidance under Section 40 of the Localism Act 2011) dated February 2013 issued by Department of Communities and Local Government
(v) Local Government Transparency Code 2014 dated October 2014 issued by Department of Communities and Local Government.
(vi) Local Government Transparency Code 2015 dated February 2015 issued by Department of Communities and Local Government
(vii) The Repayment of Public Sector Exit Payments 2015
(viii) Public Sector Exit Payments Regulations 2016
(ix) Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

Elizabeth Davison (extension 5830)

S17 Crime and Disorder	The report does not contain any Crime and Disorder implications
Health and Well Being	This report has no implications for the Council's Health and Wellbeing agenda
Carbon Impact and Climate Change	There are no carbon impact implications in this report
Diversity	There are no diversity implications in this report
Wards Affected	No wards affected
Groups Affected	No groups affected
Budget and Policy Framework	This does not impact on the budget or policy framework.
Key Decision	This is not a key decision
Urgent Decision	This is not an urgent decision
One Darlington: Perfectly Placed	This report has no particular implications for the Sustainable Community Strategy
Efficiency	There are no efficiency implications in this report
Impact on Looked After Children and Care Leavers	This report has no impact on Looked After Children or Care Leavers

MAIN REPORT

Information and Analysis

7. Following the implementation of The Localism Act 2011 the Council is required to agree a written Pay Policy on an annual basis.

8. The Pay Policy sets out the specific information on the relationship between the highest and lowest paid employees in the Council and principles associated with the payments and remuneration packages of Chief Officers both during and on termination of employment.

9. Any decisions relating to the pay and remuneration of Chief Officers must comply with the Pay Policy Statement in place at the time for that financial year and whilst the Statement can be amended in year as required, any changes must be subject to the approval of full Council. Failure to do so would be contrary to the Council's Statutory Duty under the Localism Act and would result in legal action being taken against the Council.

10. There have been no amendments to the Pay Policy since the publication in March 2019.

11. Supplementary guidance to The Localism Act; Local Government Transparency Code 2014 dated October 2014 issued by Department of Communities and Local Government sets out the requirements for calculating the pay multiple and further publication of senior salaries which the Council has implemented.

Pay Multiple

12. The Council's Pay Multiple based on highest paid taxable earnings and median taxable earnings for the whole authority (excluding casuals, apprentices and community schools) is;

	Highest paid Employee based on taxable earnings	Workforce Median Taxable earnings	Median taxable earnings Pay Multiple
Taxable Earnings Pay Multiple 2019/2020 [1]	£12,571.50	£1801.45	6.98

[1] *– Based on figures 31st December 2019 (December Pay Only)*

13. The December 2019 multiple was 6.98, a reduction on the pay multiple reported in December 2018 (7.00). The whole year multiple for 2018/19, which is reported after 31 March 2018 was 6.83.

14. The 2014 Code stipulates that the Pay Multiple will be calculated each year on a fixed date coinciding with reporting at the end of the financial year. Locally the Pay multiple is calculated each December for the approval of the Pay Policy by Council to allow publication and approval before 31 March each year. Arrangements will also be made to update the Pay Multiple figure with year-end figures in April which will be published on the Council's internet pages alongside other Transparency Code information requirements.

Senior Salaries

15. The Code requires that the Council publishes Senior Officers Salaries in excess of £50,000 and above. There is also a requirement to publish the services, functions, the budget held and the number of employees' senior officers are responsible for. This information is available on the internet with other Transparency requirements.

Other Revisions to the Pay Policy Statement

16. Other revisions to the proposed Pay Policy Statement for 2020/2021, are summarised as follows:

    (a) Update and reference to National Living Wage *(Appendix A – paragraph 25).*

Points to Note

17. The Chief Officer and Managing Director salary ranges are subject to a national pay award increase but at the time of writing these have not been agreed by the recognised National Trade Unions and Local Government Employers. When confirmation is available, references to the updated salary ranges will be updated in the Pay Policy – (*Appendix A – paragraph 8)*.

18. *Appendix A - Paragraph 20* refers to the proposed Repayment of Public Sector Exit Payments Regulations and the Public Sector Exit Payments Regulations 2016. This relates to the Government recovering exit costs of senior officers in the public sector (those earning over £80,000) and proposes repayment of termination payments in the event that they return to public sector within a prescribed period, currently proposed 12 months. The enabling provisions are set out in the Enterprise Act which received Royal Assent in May 2016. However, there is no clear timeline for the implementation of these provisions.

19. In addition, the Government is proposing to introduce a cap on public sector exit payments of £95,000 (including the capital cost of unreduced pension benefits for staff aged 55 or above). It is proposed that this cap would be subject to a right for Council to grant waivers in exceptional circumstances. Consultation has taken place on the draft regulations and we currently await further guidance. An initial implementation date has been set for 1 April 2020.

Financial Implications

20. There are no financial implications associated with the Pay Policy.

Legal Implications

21. It is a statutory requirement to calculate and publish a Pay Policy and associated ratio on an annual basis.

HR Implications

22. There are no HR implications associated with the publication of the Pay Policy. The only personally identified employee is the Head of Paid Service, Managing Director.

APPENDIX A

Pay Policy Statement 2020/2021 (in accordance with Section 38, Localism Act 2011)

Introduction

1. This document sets out the Council's Pay Policy in relation to the remuneration of its Chief Officers and staff in accordance with Section 38 of the Localism Act 2011.

2. The policy is subject to annual review and must be approved by the Council each financial year. This statement is valid from 1st April 2020 to 31st March 2021.

3. Subject to specific circumstances it may be necessary to amend the Pay Policy statement during the financial year. Any changes or amendments made will be subject to full Council approval.

4. The policy will be published on the Council's website as soon as reasonably practicable after Council approval or amendment.

5. The arrangements set out within this document do not extend to those members of staff who are employed within schools. This is because the scope of the Localism Act does not require Council's to consider individual schools.

6. The Council is mindful of its duty as defined in the Equality Act 2010. This Pay Policy Statement forms part of a range of Pay Policies to promote equality in pay practices and assists in ensuring that the Council is promoting transparency of senior managers pay and a fair approach to pay related equalities objectives.

Definitions

7. The following definitions will apply throughout this policy statement:

    a. '***Lowest-paid employees'*** are those who are employed in jobs which are paid at Band 1, spinal column point 3. This is the lowest salary paid other than National Minimum Wage Apprentices.

    The salaries attributable to Apprentices depend on age and rates set out within the National Minimum Wage legislation or national agreements. Given the specific nature of these appointments, it is felt inappropriate to include apprentices within the definition of lowest paid for the purposes of this policy statement.

    b. **'*Chief Officers'*** are those who are defined as;
        i. Head of Paid Service designated under section 4(1) of the Local Government and Housing Act 1989;
        ii. Monitoring Officer designated under section 5(1) of that Act;
        iii. Any statutory Chief Officer mentioned in section 2(6) of that Act;
        iv. Any non-statutory Chief Officer mentioned in section 2(7) of that Act;

v. Any deputy chief officer mentioned in section 2(8) of that Act.

c. ***Remuneration*'** as defined in the Localism Act associated with Chief Officers relates to;
   i. the chief officer's salary
   ii. any bonuses payable by the authority to the chief officer
   iii. any charges, fees or allowances payable by the authority to the chief officer
   iv. any benefits in kind to which the chief officer is entitled as a result of employment
   v. any increase in or enhancement of the chief officer's pension entitlement where the increase or enhancement is as a result of a resolution of the authority
   vi. any amounts payable by the authority to the chief officer on the chief officer ceasing to hold office or be employed by the authority, other than amounts that may be payable by virtue of any enactment

Remuneration of Chief Officers

8. Chief Officers and the attributable salaries (which are payable from appointment and with incremental progression) are as follows;

Post	Terms	Salary / Salary Band	Other variable Pay
Darlington Borough Council Chief Officers *Note: the salaries quoted below are based on full time equivalent hours and salary bands are from 1st April 2019. There is not yet an agreement for a pay award from 1st April 2020 for Chief Executives or Chief Officers. These details will be updated when available.*			
Managing Director	JNC[1]	£150,858 (Spot Salary)	None
Director	JNC[1]	£108,645 - £122,820 p.a.	None
Service Director	JNC[1]	£90,349 - £100,251 p.a.	None
Assistant Director (AD1)	JNC[1]	£75,778 - £90,933 p.a.	None
Assistant Director (AD2)	JNC[1]	£69,282 - £80,108 p.a.	None
Assistant Director (AD3)	JNC[1]	£58,547 - £71,448 p.a.	None
Darlington Partnership	JNC[1]	£52,025 p.a. (Spot Salary)	None
Director of Public Health	VSM [2]	£97,000 p.a. (Spot Salary)	None
Public Health Specialist	A4C[3]	£55,548 to £67,805 p.a.	None

[1] JNC - Joint National Council [2] VSM – NHS Very Senior Manager [3]A4C – Agenda for Change

Level of Remuneration Paid Upon Recruitment

9. The Council's policy on pay upon recruitment is set out in the Council's Recruitment and Selection policy which applies to all employees.

10. The Council's Constitution states that any salaries / salary packages assigned to new appointments which exceed £100,000 will be subject to full Council vote prior to an appointment being made. In order for Council to make an informed vote on the proposed salary package, detail of the component parts of the package will be disclosed, for example, the basic salary, any additional fees, charges or allowances that would be routinely payable as part of undertaking the duties of the post.

11. The salaries attributable to Chief Officer posts are subject to job evaluation and are based on:
    a. clear salary differentials which reflect the level of responsibility attached to any particular role; and

b. rates which are reasonably sufficient to recruit and retain senior officers taking into account market conditions.

12. Increases in pay for Chief Officers will occur only as a result of the following:

a. pay awards agreed by way of national / local collective pay bargaining arrangements; or
b. significant changes to a Chief Officer's role which result in a higher salary being appropriate as confirmed by the outcome of an appropriate job-evaluation process and subject to a report to Council; or
c. recruitment and / or retention payments which, in all the given circumstances at the relevant time, are deemed necessary in the best interests of the Council and which are determined under a relevant policy relating to such payments and subject to a report to Council.

13. It is expected that senior officers will perform to the highest level and performance related pay and bonuses do not, therefore, form part of current remuneration arrangements. This position will be reviewed if legislation and / or guidance relating to senior posts changes.

Election Duties undertaken by Chief Officers

14. Fees for election duties undertaken by Chief Officers are not included in their salaries. For Parliamentary, European elections, other elections and national referenda, payments are set by central government and vary depending on the nature of the poll and the size of the electorate. For the Tees Valley Combined Authority Mayoral election, the fee is set by the Combined Authority. In respect of local elections, the fees are determined separately in consultation with the other Tees Valley Councils. For contested elections, the fees are based on an agreed sum for the first 1000 electors and a further sum for each additional 1000 electors or fraction thereof, and a set agreed sum for uncontested elections.

Payments to Chief Officers on Termination of Employment / Severance

15. Chief Officers who cease to hold office or be employed by the Council will receive payments calculated using the same principles as any other member of staff; based on entitlement within their contract of employment, their general terms and conditions and existing policies.

16. In the case of termination of employment by way of early retirement, redundancy (voluntary or otherwise) or on the grounds of efficiency of the service, the Council's "Local Government Pension Scheme (LGPS) 2014 and Local Provisions Policy" and "Management of Change" Policies set out provisions which apply to all employees, regardless of their level of seniority.

17. Where a termination of employment / severance payment equates to be single payment in excess of £100,000, full Council will be given an opportunity to vote prior to the package been approved.

18. As part of making an informed vote on severance / termination payments full Council will be presented with detailed components of severance payments including, where appropriate, salary paid in lieu of notice, redundancy compensation, pension entitlement, holiday pay and any bonuses, fees or allowances paid.

19. The detail of Council voting on severance payments is set out in the Council's Constitution which is available on the Council's internet pages.

20. In line with the proposed Repayment of Public Sector Exit Payments Regulations 2015 and the Public Sector Exit Payments Regulations 2016, the Council will ensure that appropriate procedures are followed to meet the Regulation requirements associated with the Cap on exit payments and the repayment of salary payments by senior officers.

Publication of and access to Information Relating to Remuneration of Chief Officers

21. The Council publishes on its website all senior salaries in line with The Code of Recommended Practice for Local Authorities on Data Transparency and Local Government Transparency Code 2014 which have been published by the Department of Communities and Local Government. These Codes stipulate that Councils should make senior employee salaries available to the public where they exceed £50,000.

22. For transparency purposes the Council also publishes details of any posts who have received a total pay in excess of £50,000, the number of redundancies and payment bands of all relevant employees. These figures are updated annually based on figures as at 31st March of the relevant year. This is in line with Accounts and Audit (England) Regulations 2011.

23. The Council also publishes responsibilities (for example, the services and functions Senior officers are responsible for, together with the budget held and the number of staff) for all employees whose salary exceeds £50,000. Employees whose salaries are £150,000 or more will also be identified by name; locally this will only include the Manging Director.

Remuneration of Lowest Paid Employees within the Council

24. The Council introduced 'single status arrangements' in July 2006. The lowest paid employees within the authority are appointed to posts which have been evaluated using an agreed job evaluation scheme and are remunerated accordingly, or are determined within national or local agreements.

25. The Council will comply with the National Living Wage and National Minimum Wage rate of £8.72 (April 2020) for all its employees.

Relationship between Chief Officer and non-Chief Officer Remuneration

26. The Pay Multiple is calculated in line with the revised Local Government Transparency Code 2014, using the ratio between the highest paid taxable earnings for the given year (including base salary, variable pay, bonuses, allowances and the cash value of any benefits in kind) and the median earnings figure of the whole authority's workforce.

27. The Council's Pay Multiple based on highest paid taxable earnings and median taxable earnings for the whole authority (excluding casuals, apprentices and Community Schools) is;

	Highest paid Employee based on taxable earnings	Workforce Median Taxable earnings	Median taxable earnings Pay Multiple
Taxable Earnings Pay Multiple 2019/2020 [1]	12,571.50 *(£12,337.81)**	£1801.45 *(£1762.81)*	6.98 *(7.00)*

[1] *– Based on figures December 19 pay only (*December 18 Pay Only)*

28. Using December 2019 taxable pay figures, the Pay Multiple based on the Median Hourly Rate was £6.98.

29. In line with the Local Government Transparency Code 2014, the Pay Multiple will be calculated each year on a fixed date coinciding with reporting at the end of the financial year. Locally the Pay multiple will also be calculated each December for the approval of the Pay Policy by Council to allow publication and approval before 31st March each year. Pay Multiples will be published on the Council's internet pages alongside other Transparency Code information requirements.

General Principles Regarding Remuneration of Staff

30. The salaries attributable to posts are determined via job evaluation. Employees are remunerated according to the evaluated score of the post they hold and by reference to the salary band existing at any given time. Most posts include an entitlement to incremental progression.

31. New appointments are subject to the Council's Recruitment and Selection Policy and will generally be made at the bottom spinal column point of all pay bands (unless there are special circumstances and payment at a higher level can be objectively justified).

32. The Council will appoint employees based on the best person for the role in line with the Recruitment and Selection policy. The Council does not exclude the re-employment of former employees who have previously worked for the Council and is in receipt of a redundancy / compensation payment.

33. Where an employee secures a higher-graded post via internal promotion / recruitment then the Council will generally pay the salary on the next nearest point to the previous spinal column point.

34. Where an employee is redeployed because of redundancy or ill health, they will generally be appointed to the highest spinal column point within the lower grade so as to minimise financial loss.

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SPECIAL COUNCIIL
20 FEBRUARY 2020

BOROUGH OF DARLINGTON
PROPOSED SUBMISSION LOCAL PLAN 2016 – 2036

Responsible Cabinet Member – Councillor Alan Marshall
Economy and Regeneration Portfolio

Responsible Director – Ian Williams
Director of Economic Growth and Neighbourhood Services

SUMMARY REPORT

Purpose of the Report

1. This report seeks Council approval for changes to the Darlington Local Plan following the consultation which occurred in the summer of 2018 between 21 June and 2 August 2018.

2. It also seeks that Council agrees to the publication of the Proposed Submission copy of the Local Plan (incorporating the proposed changes) for the statutory six-week period to allow representations to be received prior to submission for independent examination.

3. It further seeks a number of delegated powers for the Director of Economic Growth and Neighbourhood Services in consultation with the Economy and Regeneration Portfolio Holder as set out in the recommendations.

4. It also sets out, for Council approval, the revised timetable and process for producing the new Local Plan (including the revision of the Local Development Scheme).

Summary

5. An up-to-date Local Plan is essential to meet the development needs of the Borough and to enable the Council to shape and maintain control of development.

6. The Local Plan is a framework for growth and aims to ensure that Darlington becomes an even more sustainable location in which people increasingly choose to live, work and visit. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs supporting the needs of our current and future workforce, and other new developments with the provision of key new infrastructure.

7. The success of the Borough is predicated on growth and underpins the future vibrancy of our town centre and our local communities. The Local Plan sets out how Darlington will grow, adapt and change and importantly how this will be achieved and managed. It provides the Council with the required spatial guidance and direction to contribute to and enable the structured development of the Borough – in support of both the Council's drive for a growing economy, building stronger communities and creating opportunities for all.

8. The new Local Plan will cover the period 2016 to 2036. The ambition is to prepare a Local Plan to be submitted for inspection by the end of August 2020 (with adoption likely by April 2021).

9. This report follows a previous report on 6 June 2018 which agreed the consultation on the Draft Local Plan.

10. The consultation on the Draft Local Plan was carried out for a six-week period between 21 June and 2 August 2018.

11. The consultation involved writing to all parties on the Local Plan consultation database, Parish Councils and Statutory Consultees. There was also a series of drop in sessions where officers were available to discuss the Plan. It is estimated around 600 people attended these sessions.

12. Over 1,300 comments were received from 292 residents/organisations. A summary of all comments received can be viewed in Appendices 1 and 3. The full version of all comments can be viewed on the online portal[1]. It should be noted the Local Plan is a framework with further controls and steps necessary before any development can take place.

13. Comments and recommended changes were originally to be reported to Cabinet on 9 July 2019 but this was deferred to enable further work and engagement to be undertaken into the proposed access to Skerningham Garden Village across Springfield Park.

14. Recommendations have been made on changes to the draft plan both as a result of comments received **(APPENDICES 1 and 2)** and as a result of other factors including the latest national policy and guidance **(APPENDIX 3).** Comments that haven't resulted in change have all had suggested responses **(APPENDIX 4)**. All responses will be made publicly available via the online portal subject to approval.

15. Subject to approval by Council the changes made will form the Proposed Submission Local Plan against which representations will be invited for a six-week period starting April 2020.

16. Further modifications can be suggested alongside submission to the planning inspectorate.

17. Comments and suggested changes to the Sustainability Appraisal are also submitted. **(APPENDIX 5).**

[1] darlington.gov.uk/portal

18. A Local Development Scheme 2020-23, setting out the programme for the Local Plan preparation has been produced (**APPENDIX 6**).

Recommendations

19. It is recommended that Council:-

    (a) Agree to the recommended changes to the Plan in response to representations received as highlighted in APPENDIX 1 and 2**.**

    (b) Agree the extra changes to the Plan and Policies Map suggested by officers and as a result of an Inspectors Advisory Visit (undertaken on 4 September 2019) highlighted in APPENDIX 3.

    (c) Agree the recommendations not to make further changes to the Plan as highlighted in APPENDIX 4.

    (d) Agree changes in relation to the Sustainability Appraisal (APPENDIX 5).

    (e) Agree that the attached Local Development Scheme (2020-2023) (APPENDIX 6) is approved to take immediate effect.

    (f) Agree that the Proposed Submission Draft Local Plan be approved for a six-week pre-submission representation period.

    (g) Following the conclusion of the pre-submission representation period, authorise the Director of Economic Growth and Neighbourhood Services, in consultation with the Portfolio holder for Economy and Regeneration Portfolio, to make any minor editing and formatting changes necessary.

    (h) Authorise the Director of Economic Growth and Neighbourhood Services, in consultation with the Portfolio holder for Economy and Regeneration, to thereafter submit the Proposed Submission Local Plan (including any changes made under 18(g) above) and other required documents to the Planning Inspectorate for examination.

    (i) Authorise the Director of Economic Growth and Neighbourhood Services, in consultation with the Portfolio holder for Economy and Regeneration, to ask the Inspector appointed to hold the Examination, to recommend such modifications to the Proposed Submission Local Plan and submission documents as may be necessary to satisfy the requirements as to soundness.

    (j) That Council agrees that the Proposed Submission Local Plan be approved to be placed on deposit to allow representation and then submitted to the Secretary of State for Independent Examination.

Reasons

20. The recommendations are supported by the following reasons:-

(a) Local Planning Authorities must prepare a Local Plan that sets out the local planning policies for their local planning authority area. Government guidance requires that Local Plans must be positively prepared, justified, effective and be consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF).

(b) The Council is required to have an up to date Local Development Scheme (Planning & Compulsory Act 2004, as amended by Section 111, Localism Act 2011).

Ian Williams
Director of Economic Growth and Neighbourhood Services

Background Papers

(i) National Planning Policy Framework, CLG February 2019
(ii) Planning and Compulsory Purchase Act 2004
(iii) Town and Country Planning Act (Local Planning) (England) Regulations 2012
(iv) Localism Act 2011

David Hand : Extension 6294

S17 Crime and Disorder	The Local Plan has a role in reducing crime through the promotion of good design and location of development.
Health and Well Being	A key objective of Local Plan policies will be to improve people's health and wellbeing by protecting and improving the economic, social and environmental conditions in the Borough.
Carbon Impact and Climate Change	A Sustainability Appraisal has been carried out on the strategic issues and options. Achieving sustainable development will be a fundamental objective of the Local Plan.
Diversity	An Equalities Impact Assessment will be part of the local plan preparation process.
Wards Affected	All
Groups Affected	All
Budget and Policy Framework	The Local Plan will be prepared using existing budgets and will ultimately form part of the Council's Planning Policy Framework.
Key Decision	Yes
Urgent Decision	No
One Darlington: Perfectly Placed	The Local Plan will represent the spatial implications of the overarching aims of One Darlington: Perfectly Placed.

Efficiency	The consultation stage of the Local Plan represents the most efficient way to produce the Local Plan having regard to the legislative and engagement requirements.
Impact on Looked After Children and Care Leavers	This report has no impact on Looked After Children or Care Leavers

MAIN REPORT

Information and Analysis

21. Local Planning Authorities must prepare a Local Plan that sets out the local planning policies for their local planning authority area. These policies are important material considerations when deciding planning applications, as all decisions must be made in accordance with the policies unless there are very strong reasons not to do so. Government guidance requires that Local Plans must be positively prepared, justified, effective and be consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF). The NPPF states that every local planning authority in England should seek to have in place a clear, up to date Local Plan that conforms to the Framework, meets local development needs and reflects local people's views about how they wish their community to develop. The plan preparation process should fully involve everyone with an interest in the document or area, and they should have had the chance to comment.

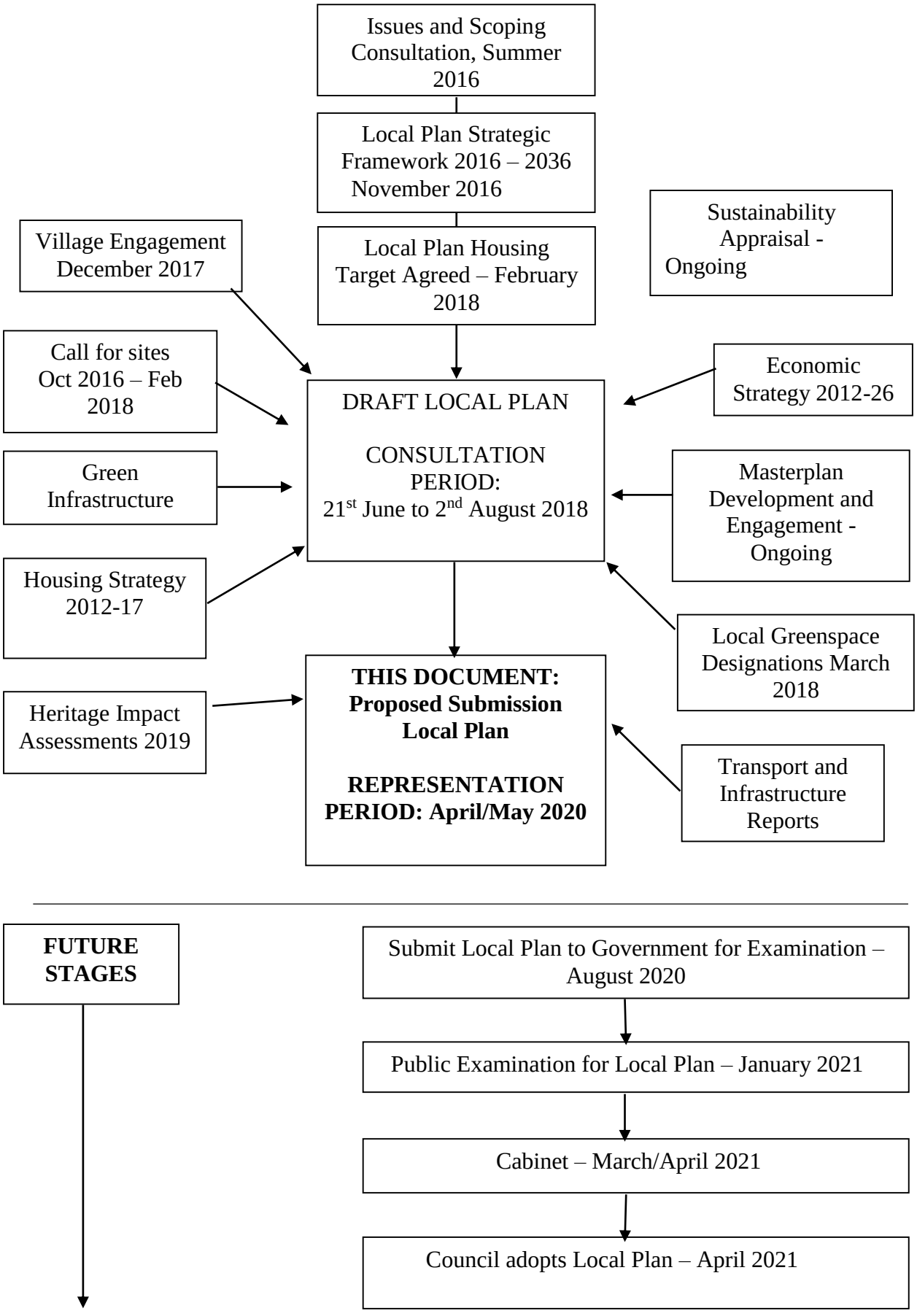
22. Darlington cannot stand still. It has to support its communities to thrive and compete with neighbouring Boroughs, and further afield, to attract investment. It needs a strong, clear Local Plan if it to grow in a sustainable way, and to preserve both its prosperity, and its unique quality of life.

23. The Local Plan is a framework for growth and aims to ensure that Darlington becomes an even more sustainable location in which people increasingly choose to live, work and visit. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs supporting the needs of our current and future workforce, and other new developments with the provision of key new infrastructure.

24. The success of the Borough is predicated on growth and underpins the future and vibrancy of our town centre and our local communities. The Local Plan sets out how Darlington will grow, adapt and change and importantly how this will be achieved and managed. It provides the Council with the required spatial guidance and direction to contribute and enable the structured development of the Borough – in support of both the Council's drive for a growing economy, building stronger communities and creating opportunities for all.

25. **Figure 1.1** shows the development stages and various evidence bases which have informed the Plan to date and the future process.

Figure 1.1: Stages of Preparation of the Local Plan



Draft Local Plan Consultation – Summer 2018

26. The Local Plan Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 requires that the local planning authority invite comments from the "statutory bodies" such as Historic England, the Environment Agency, Highways England and Natural England, together with residents and other persons carrying out business in the area about the Local Plan.

27. There are no fixed rules regarding the form and content of Regulation 18 consultations, however the Council adopted its Statement of Community Involvement (SCI) in 2016 which sets out who we will consult and how we will consult. The Issues and Scoping Consultation in Summer 2016 also formed the first part of the Regulation 18 Consultation and was reported to Cabinet on the 8 November 2016. This work then informed the development of a Draft Local Plan.

28. Members should be aware that as part of the development of the Draft Local Plan there was significant consultations as agreed with Cabinet including the establishment of Members Local Plan Reference Group, Local Plan Steering Group, Subject Theme Groups and some Parish Councils where specific engagement events were held. These consultations involved Statutory Consultees.

29. This resulted in the publication of a Draft Local Plan in June 2018 which provided the opportunity for stakeholders and local residents to comment on the policy framework to guide development over the next 20 years, together with the suggested site allocations, associated detailed assessment, and other policies which could accommodate the growth necessary to meet the Objectively Assessed Needs of the Borough. The plan was also supported by a Sustainability Appraisal (incorporating Strategic Environmental Assessment – SEA) which was also available for comment.

30. Consultation on the Draft Local Plan ran between 21 June 2018 and 2 August 2018. Numerous public drop-in events were held to allow members of the public and other stakeholders to view the plan and speak to officers. Events were held at varying times including weekends at public events as well as at locations such as the Dolphin Centre and Darlington College. During the consultation 292 individuals and organisations submitted representations generating 1344 individual comments.

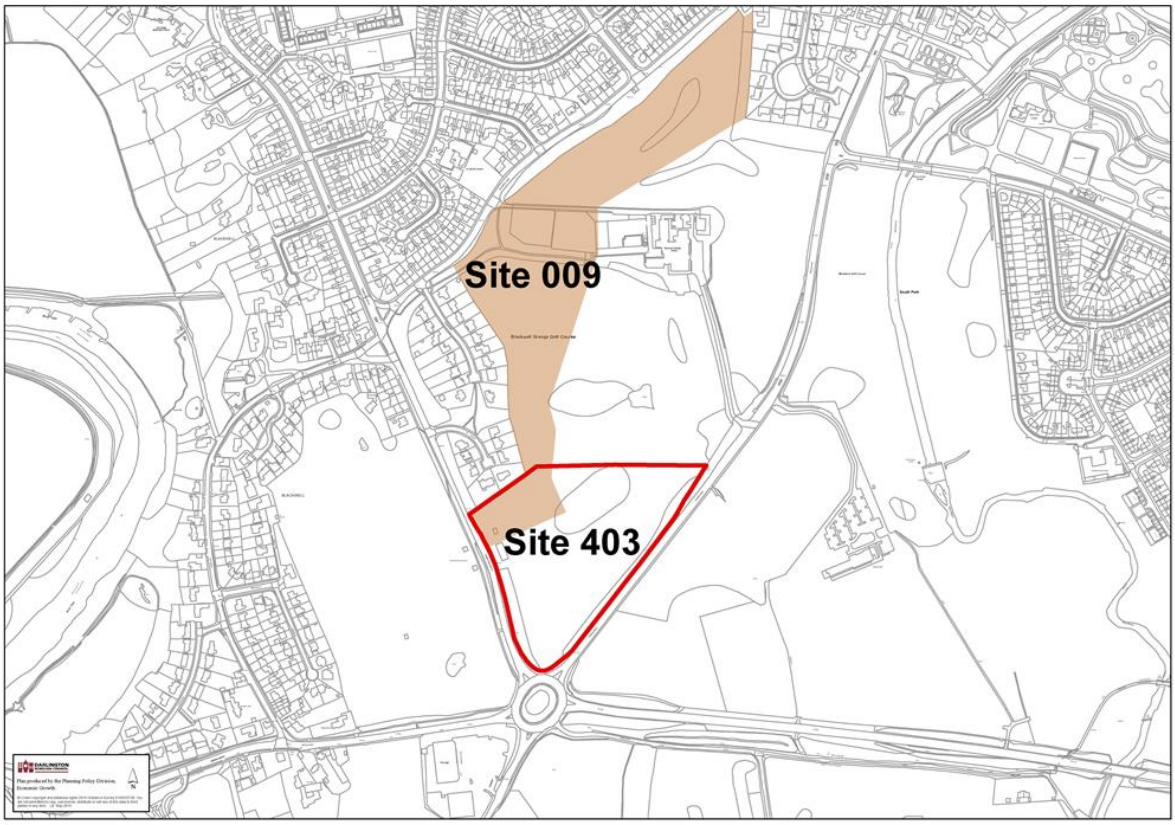
31. Summaries of all these comments are provided in APPENDICES 1 and 4. APPENDIX 1 sets out the comments that have resulted in suggested changes to the plan which equates to around 30%. APPENDIX 4 summarises comments where it is not being recommended to make alterations to the plan for submission.

32. In addition to the comments received a number of other alterations, including alterations to the Policies Map, are recommended in APPENDIX 3.

Summary of Key Changes

Housing

33. Policy H2 Housing Allocations; site 9 Blackwell Grange East – In response to representations that highlighted the relative sensitivity of Site 009 it is proposed to be replaced with revised site 403. As shown on the plan below.



34. Policy H2 Housing Allocations has been altered to remove site 375 Land South of High Stell for 100 dwellings. An initial assessment by the Council's Highway Engineer has raised issues with vehicle accessibility to this site. Concerns were also raised over impact on the amenity of adjacent residential properties. As such it has been decided to remove the proposed allocation from the Local Plan and amend development limits to exclude the land.

35. Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within policy H 4 Housing Mix. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan.

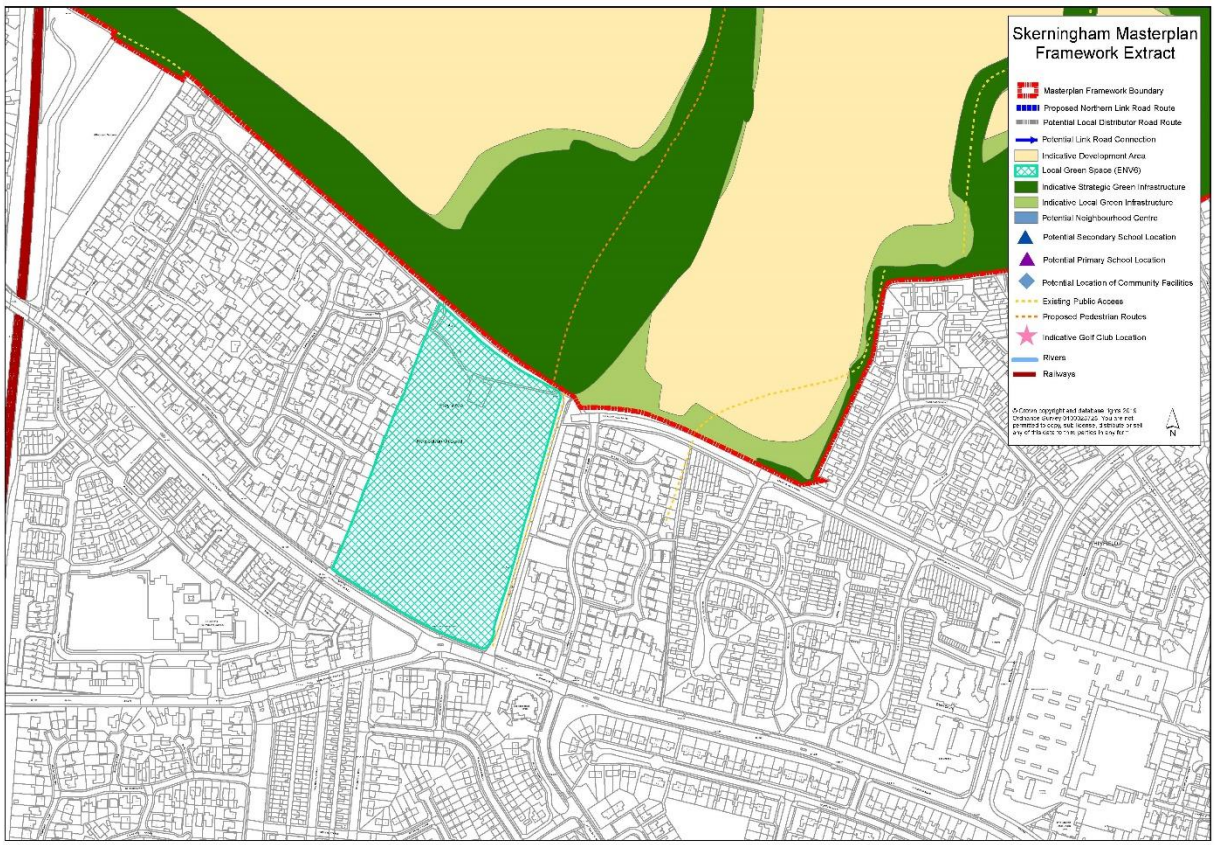
36. The Draft Local Plan identified a number of potential access points into the Skerningham Strategic Allocation site (Policy H 10), one of which was through Springfield Park. A number of objections to this proposal were raised during consultation on the Draft Local Plan in 2018. This was also specifically raised when the Local Plan was scrutinised by Place Scrutiny Committee on 13 June 2019 and it was resolved as there was no modelled evidence to suggest the Springfield Park access road was critical, that this should be removed from the Plan and that paragraph 6.10.13 be removed from the Local Plan. To provide more information to inform decisions on this matter additional traffic modelling work was commissioned to establish how the traffic patterns might change if the access point across Springfield Park was removed from the plan. In addition, the site promoters Skerningham Estates Ltd also undertook additional work to identify how the road could be aligned and what opportunities the sites allocation might create to make improvements to the park as part of development. The additional traffic modelling indicated that, whilst beneficial, an access across Springfield Park has not been shown to be critical at this stage of traffic assessment.

37. Additional engagement with the public and other stakeholders took place in January 2020 to inform them of the results of the further traffic modelling work, and to share the potential designs for a remodelled park. Two drop-in sessions were held in January where Council officers and representatives of the site promoter were available to answer questions. A questionnaire was produced asking for people's opinions on two matters:

    (a) Question 1: The Skerningham Development proposed a number of vehicle access points in the draft Local Plan. The information provided shows the traffic levels that could be generated on the local roads both with and without the new link road along the side of Springfield Park. Do you think the new Springfield Park Access Road should be included? - 73% answered No to this question and 27% answered Yes (out of 101 responses).

    (b) Question 2: If Included the Springfield Park Access Road is shown to run alongside the edge of the existing Park minimising the impact on the Park. The Park will also be extended in size and significantly enhanced with pedestrian, cycle ways, water features and an improved play area. An illustrative option has been produced identifying what can be provided with the Access Road running alongside of the park? Would you be in favour of the proposal? - 67% answered No to this question and 33% answered Yes (out of 99 responses).

38. As a result of that resolution and two public engagement events on this matter, it is recommended that Springfield Park be removed from the boundary of the Skerningham Strategic Allocation as highlighted in Policy H 9. It is therefore further recommended that figure 6.1 is amended to remove Springfield Park and any indicated access points (See extract from Figure 6.1 below). Furthermore that the Policies Map is amended to remove Springfield Park from Site 251 and amend the site boundary of the allocation. It is further recommended that the site area in Policy H 2 is amended to reflect the change.



39. As a consequence of removing Springfield Park from the proposed Skerningham allocation the site has been reassessed as one of the sites submitted for consideration under policy ENV 6 as a Local Green Space. It is recommended that the site now be designated and listed in Table 9.1 of Policy ENV 6.

Heritage Policies

40. Following comments from Historic England Heritage Policies ENV1 and ENV2 have been redrafted (in consultation with Historic England) APPENDIX 2d.

Biodiversity and Geodiversity

41. Changes made to Policy ENV 7 to reflect the revised NPPFs requirement to provide net gains for biodiversity as a result of developments.

Wording Changes within the Plan

42. Please note that within the various Appendices to this report are details of changes to the wording of the plan which are displayed as track changes whereby:

    (a) ~~strikethrough~~ = deleted text
    (b) underline = new text

Proposed Submission Local Plan – Regulation 19

43. The next phase is the deposit of the Local Plan (incorporating the proposed changes) for a statutory six-week period to allow comment and representations Under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 to be received prior to submission for independent examination.

44. This allows local communities, businesses and other interested stakeholders with the opportunity to comment on the policy content on the Council's final version of the Local Plan, within a specific remit. It should be noted that this period of representations is limited to comments and observations on legal compliance of the Plan and on the 'Test of Soundness'. The national planning policy framework suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

    (a) Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

    (b) Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

    (c) Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

    (d) Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

45. Once Regulation 19 is complete, an updated Proposed Submission Local Plan is then submitted to the Secretary of State for the Department for Housing, Communities and Local Government. They will then appoint an independent Planning Inspector to undertake a 'public examination' of the Local Plan.

46. During the examination process, the Secretary of State and the Planning Inspector will use the National Planning Policy Framework and comments and representations submitted during the Regulation 19 stage to determine whether a Local Plan is sound and legally compliant.

47. The Inspector in examining the plan and taking account of representations made, may conclude that modifications are required to make it sound and capable of adoption. It is proposed that the Director of Economic Growth and Neighbourhood Services, in consultation with the Portfolio holder for Economy and Regeneration, be delegated authority to recommend to the Inspector such modifications to the draft Local Plan submission documents as may be necessary to satisfy the requirements as to soundness.

48. The evidence base that has been used to produce the plan will be available. This includes:

    (a) Strategic Housing Market Assessment (SHMA) including the Objective Assessment of Housing Needs Report (OAN)
    (b) Strategic Flood Risk Assessment (SFRA)
    (c) Flood Risk Sequential and Exceptions test
    (d) Transport and Traffic reports
    (e) Infrastructure delivery plan
    (f) Whole plan viability report
    (g) Village sustainability evidence
    (h) Housing selection statement
    (i) Housing and Economic Land Availability Assessment (HELAA)
    (j) Consultation statement
    (k) Equality impact assessment
    (l) Statement of common ground
    (m) Sustainability Appraisal
    (n) Habitat Regulations Assessment scoping report
    (o) Impact of Growth on Sports Facility Requirements
    (p) Heritage Impact Assessment of specific allocation sites
    (q) Town Centre and Retail Study
    (r) Gypsy and Traveller Accommodation Assessment
    (s) Employment Land Review
    (t) Landscape Assessment Review

Outcome of Representations

49. The responses received during the representation period will be carefully considered. It is suggested that any minor editing and formatting changes that are necessary as a result could be dealt with by the Director of Economic Growth and Neighbourhood Services, in consultation with the Portfolio holder for Economy and Regeneration Portfolio.

50. If the representations received require more substantive change, they would be taken through the Members Local Plan Reference Group and if deemed necessary, further changes to the Local Plan could be proposed. If this is required, then it would require further formal consideration by Members.

Further consideration of an access through Springfield Park

51. As a result of this further work, and following public engagement, Springfield Park has been removed from the boundary of the Skerningham Strategic Allocation and the Skerningham Masterplan Framework been amended to remove the indicated access points. The access points for the Skerningham site will need to be determined by a transport assessment, and reflected in the masterplan, submitted in support of a planning application for the site.

Next Steps

52. As set out in Figure 1.1 earlier in this report there are three further Key Stages after Regulation 19 stage before the Local Plan can be adopted. These are Submission to Government for Examination, Public Examination and Council Adoption. An updated timetable is provided in the Local Development Scheme.

Local Development Scheme 2020-2023

53. The Local Development Scheme (LDS), attached at APPENDIX 6, is a statutory requirement. It sets out the planning policy documents that the Council will prepare over the next three years, when the key stages of preparation will be, the scope of each document, the resources available for, and risks to, their preparation. It will replace the existing LDS 2018-21.

54. The focus over the next 1-2 years will be on producing the Local Plan itself and carrying it through Examination to Adoption. Work is also planned to revise the current Planning Obligations and Design Supplementary Planning Documents. It is also hoped that with the co-operation of other Tees Valley Authorities work will begin on a joint Tees Valley Climate Change Supplementary Planning Document.

55. Following the adoption of the Local Plan the policies and proposals will need to be monitored to assesses their effectiveness and an Implementation Plan produced to ensure delivery of the Plan.

56. This report proposes that the LDS should take effect the day after this Council meeting.

Financial Implications

57. Local Plan preparation and allowances are made within the existing Local Plan Budget to facilitate the next stage of plan preparation.

58. Going forward the Local Plan will be key to delivering housing, employment and infrastructure development and is an important determinant of the future economy of Darlington.

Legal Implications

59. There are no direct legal implications arising from this report. However, it is important the Regulation 19 stage is undertaken to allow stakeholders and local people the opportunity to make representations.

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APPENDIX 1

Comments Resulting in Recommended Changes to Local Plan

Comments can be viewed in full at www.darlington-consult.objective.co.uk/portal
Subject to member approval 'Officer Responses' will also be made available online.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
Mr Paul Howell				DBDLP319	1.3.4	Paragraph	Neutral	Heritage Action Zone should be connecting with Town Centre and visitor strategy	HAZ can be integrated into this section	Rail heritage Group has informed proposals **for the Heritage Action Zone area (with North Road and Railway museum) which will** support the Bi-centurial celebrations **....**
Ms Melanie Lindsley	The Coal Authority			DBDLP1074		Other Policies, Plans, Strategies and Studies	Neutral	Omission of policy for past coal mining history	Could be considered in the supporting text (glossary) of the local Plan and more reference to Joint Waste and Minerals Plan	Add Tees Valley Joint Minerals and Waste plan 2011 with reference to **Coal Authority legacy records in footnote**
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP658	1.6.3	Paragraph	Neutral	More narrative required on HNT principles	Issue noted and integrated into Plan.	The Healthy New Towns Principles Diagram will be incorporated into the plan instead of the list after Paragraph 1.6.3.
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP1019	1.7.2	Paragraph	Object	The Draft Local Plan does not specifically identify strategic policies as required by national policy. Paragraph 21 of the National Planning Policy Framework states that strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans.	The Proposed Submission Local Plan will clearly set out which policies are strategic. The Proposed Submission Local Plan will provide an update on the position and status of Neighbourhood Plans being prepared in the borough.	The Proposed Submission Local Plan will clearly set out which policies are strategic. Paragraphs 1.7.1 and 1.7.2 have been amended to provide an update on the position and status of Neighbourhood Plans being prepared in the borough.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								Low Coniscliffe and Merrybent Parish Council consider there is a need for a greater emphasis on the role of neighbourhood planning in the Local Plan.		
Marion Williams	Environment Agency			DBDLP 1266	2	VISIONS, AIMS AND OBJECTIVES	Support	General Support / some issues mentioned to enhance in Vision text: to include: enhancement of built and green Environment Aim 5: Countryside and Environment enhancements through SUDS and Natural Flow Management suggested Aim 6: Climate change: Marginal changes to the policy requested to actively encourage energy water efficient design....	Support noted / some areas can be improved 5d is covered by DC 4 and part of environmental flood mitigation tools Vision generally has been tested and agreed through the Environment and Ecology Theme Group in 2017	Local Plan Vision 2.0.1 : Its coherent community, natural and historic environment will be enhanced and continue to be cherished protected and celebrated….. the Borough's needs for housing, jobs and other development being met, supported by new and improved built and green infrastructure and community facilities.' 2.0.2 in 6. Responding to Climate Change and Reducing Energy Consumption: c) actively encourage energy and water efficient design in all new and existing housing, industrial and commercial developments.
Mrs Gwen Park				DBDLP 177	2.0.1	Paragraph	Object	Totally disagree that 10000 houses are required in Darlington. Disagree with building on green belt countryside when there are many brown field areas in Darlington. Object to the removal of areas such as Springfield Park and the surrounding area as this will have negative physical and metal effects on people.	Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP354	2.0.2	Paragraph	Object	Aim 1 - We question whether the aspirational figure of 7,000 new jobs can be achieved. Aim 2 - We support objectives a. to d. However, we consider the number of houses DBC aspires to deliver to be excessive and unachievable. Aim 3 - Support objectives a and e. However, we are very concerned at some of the proposed roads and object to Darlington Northern Link Road Route B.	The jobs growth factored into the plan is realistic as it is based on past trends of employment growth in the borough. Further detail can be found in the officer response on the housing requirement and standard method, and the Darlington Future Employment Needs Report (September 2017) produced as part of the Local Plan evidence base. Please see officer response on housing requirement and standard method. Only Route A of the proposed Northern Link Road is now being explored and this position will be reflected on the Key Diagram.	Route option B of the proposed Northern Link Road has been removed from the Key Diagram.
Northumbrian Water Ltd		Miss Isobel Jackson	Senior Planner Lichfields	DBDLP851	2.0.2	Paragraph	Object	2.)Meeting the Housing Needs of the Borough An objective which specifically refers to housing in rural areas to meet identified local needs should be included. This would ensure that the Local Plan reflects the objectives of the National Planning Policy Framework (NPPF) (2018) which seeks at paragraphs 77-78 that: *"in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs….[and] to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive…"*	Can be included in one of the bullets a) supply of land for new housing	Aim 2 a) Maintain a supply of land for new housing developments that meets the needs of the growing number of households **in Urban and Rural areas of the Borough.**

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
Ms Emily Hrycan	Historic England			DBDLP1103	2.0.2	Paragraph	Object	Aim 4 a) to be strenghtened to include all of the historic environment of Darlington	General Support noted and minor amendment to be made.	a) Protect, maintain and enhance Darlington's **historic environment and** its identity as a historic market town, set amongst countryside and surrounding villages with strong links to railway, Quaker and industrial heritage.
Mr Christopher Bell	Highways England			DBDLP885		Sustainability Appraisal and Habitats Regulations Assessment	Neutral	It is noted that an SA report has been published alongside the Draft Local Plan, and that a Habitats Regulations Assessment (HRA) is being prepared and will be published alongside the Publication Local Plan.	Comments noted. An updated Sustainability Appraisal and a Habitats Regulation Screening Assessment will be published alongside the Proposed Submission Local Plan in due course. Paragraphs 2.1.1 and 2.1.2 of the Local Plan has been updated to reflect this.	The final sentence of paragraph 2.1.1 has been amended to read: '~~The~~A Draft SA ~~will be~~was published alongside the Draft Local Plan in June 2018, with an updated SA produced to accompany the Proposed Submission Local Plan.' The first sentence of paragraph 2.1.2 has been amended to read: 'Alongside the SA, a Habitats Regulations Assessment (HRA): Screening Report has been~~is being~~ prepared. The final sentence of paragraph 2.1.2 has been amended to read: 'The HRA ~~report will be published alongside the Publication Local Plan~~: Screening Report concludes that the emerging Local Plan is not likely to give rise to any negative impacts on any Natura 2000 sites as a result of the adoption of the document in the borough of Darlington and therefore an Appropriate Assessment is not required.'
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP45	Policy SH 1	Settlement Hierarchy	Object	Support for policy to the extent that Neasham would be classified as a rural village. Development Limits should not be used in the Plan. Their use is not consistent with the NPPF which seeks a more flexible and positive approach. Notwithstanding the above, development limits at Neasham on the policies map should be updated to reflect the current commitment at Neasham Nursery, site ref 54. This site is being developed by a smaller builder. Reference to draft NPPF requiring that at least 20%	Support noted. The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such	Remove site 54 Neasham Nursery from table 6.4 housing commitments, Appendix A Housing Trajectory and Policies Map 14. Alter development limits to include the application site area.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								of sites identified in plans are of half a hectare or less. Specific comments on the Housing and Employment Land Availability Assessment and site 54: • No other sites were considered in Neasham. Site 54 is therefore that to be considered for further development. • There was a significant amount of built form on the site extending beyond the site subject of planning permission 16/01020/OUT. • A portion of the site has been found to be suitable for development as evidenced by the planning permission. The HELAA commentary should be updated accordingly. The balance of site 54 remains available for further development. The NPPF supports some housing development in the rural area where it would enhance or maintain the viability of a community. There are existing services in Neasham which future residents could support and benefit from.	development limits are to be utilised in the emerging Local Plan. The boundary for site 54 on the policies map includes a wider area than the approved permission (ref 16/01020/OUT) and this is an error. A variation of condition application (18/00501/FUL) was also recently approved for the site which involved alterations to the scheme and a reduction in yield to 9 dwellings. Commitments of less than 10 dwellings will not be included in the Local Plan, as such this site is to be removed from table 6.4, Appendix A Housing Trajectory and the policies map. Any completions from the scheme will however be counted towards meeting the housing requirement and target of the Local Plan. As the scheme is under construction the development limits will be altered to include the application site area. Consideration has been given to the new requirement in the NPPF (2019) that land to accommodate at least 10% of the housing requirement should be on sites no larger than one hectare. Evidence can be provided if this requirement cannot be met. Comments noted regarding site 54 Neasham Nursery. The HELAA is a high level assessment of sites put forward for consideration in the Local Plan process. The permission under construction is acknowledged in the proposed amendment to the development limits above however the wider site is not consider suitable for allocation as it does not accord with the locational strategy of the plan. Housing allocations are focused on the main urban area and service villages as these	

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
									areas provide (or will be able to provide) the level of services, facilities and employment opportunities that are required to support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 590	Policy SH 1	Settlement Hierarchy	Support	Support of policy SH 1. It would be useful to indicate where Darlington sits in the settlement hierarchy of the Tees Valley. Support for the commitment in this policy (and in Statement 1) that development in the "service villages" would be "to meet local needs" only, so will not include commuter housing estates. Policy intentions expressed here and in ENV3, in terms of maintaining the distinctiveness of villages and the openness of the countryside, would be best achieved by creating a green belt designation.	Support noted. The introduction chapter of the Local Plan is to be updated for the next stage of plan preparation. Additional context on the Tees Valley will be added to this section. It should be noted that reference to local needs in statement 1 also includes borough wide needs. It is not the Council's intention to designate any green belt in the new Local Plan. The NPPF sets out that new green belt should only be established in exceptional circumstances for example when planning for larger scale development such as new settlements or major urban extensions. It is considered that normal planning policies will be adequate to protect the countryside and to prevent the sprawl of built up areas. Further detail on green belt policy can be found in the NPPF.	Add additional Tees Valley context to the introduction chapter.
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1202	Policy SH 1	Settlement Hierarchy	Object	Concern that the draft Policies Map identifies the operational Airport as undesignated land outside of Development Limits and therefore classed as 'countryside' in the Settlement Hierarchy. This would clearly	Comments noted. Amended policy text (SH 1) suggested for clarity. Additional reasoned justification will also be applied to 6.3.4 (Development Limits). The suggestions from DTVA for separate policy for airport and	Text to be added to final paragraph of SH 1. All areas outside the Development Limits are to be regarded as 'countryside' unless specifically identified for other uses in the plan (E1, E2 and E3).

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								conflict with its role as a key strategic location for growth during the plan period. This would also conflict with the requirements of the NPPF. Following modifications are proposed. • The Airport's boundary (see Appendix 1) (see file attached to comment DBDLP1189) should be identified on Policies Map and linked to a new airport-specific policy; • Draft Policy SH1 (Settlement Hierarchy) and its supporting text should be revised to identify that DTVA is a 'Strategic Growth Location' and it will be an appropriate location for new development during the Plan period.	inclusion of Strategic Growth Location is not considered appropriate at this time but will be kept under review. Amendments have been made to employment allocations at the airport.	Additional text to be added at the end of paragraph 6.3.1. There are a number of other non housing allocations beyond development limits that are considered appropriate locations for their identified uses (policies E 1, E 2 and E 3).
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP38	Statement 2	Rural Villages	Object	Development limits should not be used There needs to be definition of 'infill' which should include the filling of gaps between existing buildings and the rounding off of villages. The Plan should facilitate the delivery of this objective through the allocation of sites which can deliver up to 10 dwellings for affordable housing.	Development Limits for rural villages offer the opportunity for infill sites in villages and is further supplemented by H6 and H7 and E4 which looks at development in the countryside. A definition for infill development will be added to the glossary. It is however considered that the rounding off of villages does not fall under the definition. The approach in policy H 6 Rural Exceptions is set out in national planning policy. Para 77 of the NPPF	Text below to be added to the glossary: Infill development - The development of a small area of vacant land between existing buildings.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
									states, local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. In Part 1 of the SHMA (2015) there is limited spatial evidence on the distribution of affordable housing needed. There is no evidence of specific unmet needs for additional affordable housing in the service villages or rural villages. Consequently there is not the evidence to support the allocation of rural exception sites and a more flexible criteria based policy approach is required. A number of other local authorities in the North East region have also taken this approach.	
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1023	Statement 2	Rural Villages	Object	Statement fine misspelling in Statement	Misspelling	Spelling: ..High Conniscliffe, Low Conniscliffe, Merrybent, Neasham ....
Gordon Pybus	Darlington Association on Disability			DBDLP 75	Policy DC 1	Sustainable Design Principles	Object	Request for more inclusive wording.	Alternative wording to be included as appropriate.	Apply the suggested word changes above as appropriate within the document.
Mrs Gwen Park				DBDLP 242	Policy DC 1	Sustainable Design Principles	Object	Objection to potential development of Springfield Park, the Historic Lane and relocation of the Golf Course. All which provide benefits for Health and Wellbeing of local residents.	See officer response paper on Skerningham comments.	See officer response paper on Skerningham comments.
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington			DBDLP 662	Policy DC 1	Sustainable Design Principles	Neutral	Need of a reference to natural surveillance and the adopted Design SPD.	To be included going forward.	Reference to natural surveillance and the Design SPD to be incorporated into Policy DC 1.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
	Borough Council / Healthy New Towns									
Mr Steven Drabik	Architectural Liaison Officer Durham Constabulary			DBDLP 1096	Policy DC 1	Sustainable Design Principles	Neutral	Additional paragraph suggested for inclusion in reasoned justification to link to Crime and Disorder Act 1998.	Merits of it's inclusion to be considered prior to next stage of plan development.	Inserting the following to reasoned justification .....*"This policy will be implemented and monitored by making and reviewing decisions on planning applications taking into consideration the Local Authorities obligations as set out in Section 17 of the Crime and Disorder Act 1998".*
Marion Williams	Environment Agency			DBDLP 1267	Policy DC 1	Sustainable Design Principles	Neutral	Enhanced wording suggested for point e) around integration of landscaping in proposals.	Suggested wording seems reasonable so suggest integration with Policy DC 1.	Replace point e) with the following text..... '…that the layout of the proposal, associated green infrastructure, and landscaping has been developed to complement and enhance both the ecological function of the local area and character of the built environment, retaining existing features of interest.'
Marion Williams	Environment Agency			DBDLP 1268	Policy DC 1	Sustainable Design Principles	Neutral	Advised to consider including reference to climate change in sustainable design principles.	Noted. Rewording will be incorporated into the next stage of plan development.	Include climate change in sustainable design principles.
Marion Williams	Environment Agency			DBDLP 1269	5.1.2	Paragraph	Neutral	Suggested reconsideration of wording of this paragraph.	Agreed this paragraph requires rewording.	Reword as follows: Design is not just about the architecture or style of a building. It is also about the spaces in and around the development, the quality of the relationships between the development and surrounding areas and the appropriateness of the function of the building in its context. Darlington is experiencing ongoing change and good design **will help to maintain a 'sense of place'.** ~~which~~ **In turn this improves the** quality of the built environment, its public spaces, its heritage and local distinctiveness~~, and~~ **which** ~~will~~ **all** contribute to the community's quality of life ~~helping to create a 'sense of place'.~~
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington			DBDLP 664	5.1.3	Paragraph	Neutral	Strengthen with link to adopted design policy.	This is a logical addition.	Change wording to "demonstrate how good design principles *and adopted design policy* have been applied..."

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
	Borough Council / Healthy New Towns									
Mr Steven Drabik	Architectural Liaison Officer Durham Constabulary			DBDLP748	5.1.3	Paragraph	Neutral	Suggest that reference should be made to the Councils "Design of New Development Supplementary Planning Document 2011"	Reference to the councils Design SPD would be useful in this introductory chapter.	Include reference to Design SPD.
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP669	5.2.6	Paragraph	Neutral	Include Healthy New Towns principles diagram.	Agree we will look at options to further integrate Healthy New Towns work.	Local Plan to Include HNT design principles diagram.
Dave McGuire	Sport England (North East)			DBDLP102	Policy DC 2	Health and Wellbeing	Support	Support and link to guidance provided.	Support noted and merits of including link to guidance to be considered.	Insert in reasoned justification: *'The applicant should set out within their Design and Access Statement how the proposals have been designed to take account of the requirements of this policy. Applicants are also encouraged to utilise the design principles set out within Sport England's 'Active Design' guide when preparing a development scheme in order to promote active, healthy and stronger communities.'*
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP595	Policy DC 2	Health and Wellbeing	Object	Support for concept of policy but objection raised to the strategic allocation sites. Recognition should be given to the importance of green space, open	General support noted. Paragraph 5.2.6 acknowledges that public realm (which can include countryside) have an important role to play in health and wellbeing. This could be extended to areas of tranquility. Bullets to be numbered for clarity.	add roman numerals to bullet points under point d).

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								countryside and tranquility provide for health and wellbeing. Suggest renumbering bullet points under section d).		
Hilary Hall	Project Manager Healthy New Towns Darlington			DBDLP 1041	Policy DC 2	Health and Wellbeing	Neutral	Healthy New Towns Principles should have more prominence. Healthy New Towns Principles Diagram should be reflected in the document.	Agree HNT principles should be given more prominence and this will be considered prior to the next stage of plan development. A HNT final report is due to be published soon the findings of which will be considered.	Increase prominence of HNT principles including the incorporation of the HNT principles diagram.
Paul Hunt	Persimmon Homes			DBDLP 1180	Policy DC 2	Health and Wellbeing	Object	Objection to requirement for Health Impact Assessment. The 100 houses or more requirement is not justified and they are consider an unnecessary burden on developers that is not consistent with National Policy.	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. This is supported by the 3 dimensions to sustainable development (see National Planning Policy Framework, 2019). Government guidance[1] sets out how health and well-being and health infrastructure should be considered in planning decision making and states: *'Local authority planners should consider consulting the Director of Public Health on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment may be a useful tool to use where there are expected to be significant impacts.* *Similarly, the views of the local Clinical Commissioning Group and NHS England should be sought*	HIA's are considered an appropriate and government endorsed method of considering potential health impacts and encouraging improvement in major developments. They are not intended to be onerous but instead informative. Content can be proportionate to the scale of development and incorporated within existing design and access statements. HIA to be applied to all other major developments which would include commercial. Policy to read: h. require, in the case of development of 100 or more homes and all other 'major' development, the submission of a Health Impact Assessment (HIA)

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									regarding the impact of new development which would have a significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services. *Information gathered from this engagement should assist local planning authorities consider whether the identified impact(s) should be addressed through a Section 106 obligation or a planning condition. These need to meet the criteria for planning obligations.'* The 100 or more unit threshold has been set to provide more certainty as to the size of development where 'significant impact' may occur. [1] https://www.gov.uk/guidance/health-and-wellbeing	
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP1110	Policy DC 2	Health and Wellbeing	Object	Health Impact Assessment (HIA) for development of 100 homes or more is objected to this and they believe it makes the Policy DC2 unsound. Suggest removing the 100+ requirement and have this determined at pre-application stage on a case by case basis.	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. This is supported by the 3 dimensions to sustainable development (see National Planning Policy Framework, 2018 paragraph 8). Government guidance[1] sets out how health and well-being and health infrastructure should be considered in planning decision making and states: *'Local authority planners should consider consulting the Director of Public Health on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population*	HIA's are considered an appropriate and government endorsed method of considering potential health impacts and encouraging improvement in major developments. They are not intended to be onerous but instead informative. Content can be proportionate to the scale of development and incorporated within existing design and access statements. HIA to be applied to all other major developments which would include commercial. Policy to read: h. require, in the case of development of 100 or more homes and all other 'major' development, the submission of a Health Impact Assessment (HIA)

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									or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment may be a useful tool to use where there are expected to be significant impacts. *Similarly, the views of the local Clinical Commissioning Group and NHS England should be sought regarding the impact of new development which would have a significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services.* *Information gathered from this engagement should assist local planning authorities consider whether the identified impact(s) should be addressed through a Section 106 obligation or a planning condition. These need to meet the criteria for planning obligations.'* The 100 or more unit threshold has been set to provide more certainty as to the size of development where 'significant impact' may occur. [1] https://www.gov.uk/guidance/health-and-wellbeing	
Gordon Pybus	Darlington Association on Disability			DBDLP 1411	Policy DC 2	Health and Wellbeing	Object	Suggest changes to policy wording to be more inclusive of more disabilities. In singling out Dementia as a condition this could be to the detriment of other needs. Need for Equality Impact Appraisal before plan is adopted.	Balancing varying need across a plan always requires compromise. Dementia is of significant concern nationally over the next 20 years with an aging population profile so needs to be considered alongside other specific needs. An Equalities Impact Appraisal will be produced to consider potential impacts in detail.	d) to be reworded accordingly: d. ~~develop neighbourhoods and centres that~~ ensuring that new developments:- • are age friendly, inclusive, safe and attractive, and easily accessible on foot or by bicycle. Where appropriate this should integrate dementia friendly design principles;

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										• have a strong sense of place which encourages social interaction; • ~~integrate dementia friendly design principles, including benches and landmark features~~; • are designed to promote active travel and other physical activity~~;provide access to a range of facilities including transport, health and sport and leisure facilities;~~ • ~~are designed to promote physical activity,~~ through the arrangement of buildings and uses, access to open space and landscaping~~, and the provision of facilities to support walking~~. • promote improvements and enhance accessibility to the borough's greenspaces and green infrastructure corridors; • ~~improve air and water quality, and reduce noise within the main urban area;~~ • ~~ensure development does not have an adverse impact on the environment or residential amenity through air, noise/vibration, soil, surface and groundwater pollution;~~ • All new development that may cause groundwater, surface water, air (including odour), noise or light pollution either individually or cumulatively will be required to incorporate measures as appropriate to prevent or reduce their pollution so as to not cause unacceptable impacts on the living conditions of all existing and potential future occupants of land and buildings, the character and appearance of the surrounding area and the landscape; • require, in the case of development of 100 or more homes and other 'major' developments, the submission of a Health Impact Assessment (HIA)(6)as part of the application to explain how health considerations have informed the design.

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ck McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1307	Policy DC 2	Health and Wellbeing	Object	Objection to the requirement for HIA and it is considered the 100+ house cut off is unjustified as is why it does not apply to commercial development. Further detail on the requirements of an HIA will also be required. Considered an unnecessary burden on developers.	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. This is supported by the 3 dimensions to sustainable development (see National Planning Policy Framework, 2018 paragraph 8). Government guidance[1] sets out how health and well-being and health infrastructure should be considered in planning decision making and states: *'Local authority planners should consider consulting the Director of Public Health on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment may be a useful tool to use where there are expected to be significant impacts.* *Similarly, the views of the local Clinical Commissioning Group and NHS England should be sought regarding the impact of new development which would have a significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services.* *Information gathered from this engagement should assist local planning authorities consider whether the identified impact(s) should be addressed through a Section 106 obligation or a planning condition.*	HIA's are considered an appropriate and government endorsed method of considering potential health impacts and encouraging improvement in major developments. They are not intended to be onerous but instead informative. Content can be proportionate to the scale of development and incorporated within existing design and access statements. HIA to be applied to all other major developments which would include commercial. Policy to read: h. require, in the case of development of 100 or more homes and all other 'major' development, the submission of a Health Impact Assessment (HIA)

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									These need to meet the criteria for planning obligations.' The 100 or more unit threshold has been set to provide more certainty as to the size of development where 'significant impact' may occur. [1] https://www.gov.uk/guidance/health-and-wellbeing	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1330	Policy DC 2	Health and Wellbeing	Object	Objection to Health Impact Assessment requirement and particularly the 100+ house threshold. Additional information should be provided as to what would be required as part of an HIA.	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. This is supported by the 3 dimensions to sustainable development (see National Planning Policy Framework, 2018 paragraph 8). Government guidance[1] sets out how health and well-being and health infrastructure should be considered in planning decision making and states: *'Local authority planners should consider consulting the Director of Public Health on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment may be a useful tool to use where there are expected to be significant impacts.* *Similarly, the views of the local Clinical Commissioning Group and NHS England should be sought regarding the impact of new development which would have a*	HIA's are considered an appropriate and government endorsed method of considering potential health impacts and encouraging improvement in major developments. They are not intended to be onerous but instead informative. Content can be proportionate to the scale of development and incorporated within existing design and access statements. HIA to be applied to all other major developments which would include commercial. Policy to read: h. require, in the case of development of 100 or more homes and all other 'major' development, the submission of a Health Impact Assessment (HIA)

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									significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services. *Information gathered from this engagement should assist local planning authorities consider whether the identified impact(s) should be addressed through a Section 106 obligation or a planning condition. These need to meet the criteria for planning obligations.'* The 100 or more unit threshold has been set to provide more certainty as to the size of development where 'significant impact' may occur. [1] https://www.gov.uk/guidance/health-and-wellbeing	
Mrs Gwen Park				DBDLP178	Policy DC 2	Health and Wellbeing	Object	Perceived loss of Springfield Park and countryside would have a negative impact on Whinfield residents health and wellbeing.	See officer response paper on Skerningham comments. In relation to the wider countryside existing public rights of way will be protected and publically accessible green space will be integral to the masterplan. See paragraphs 6.10.9, 6.10.11 and 6.10.12 of the draft plan.	See officer response paper on Skerningham comments.
Mr Ben Lamb	manager Tees Rivers Trust			DBDLP28	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Neutral	Question as to if additional guidance will be provided as to when SUDS may not be appropriate.	This comment is supported by Northumbrian Waters response (DBDLP734) that the onus should be on developers to deliver SUDS and only excluded in exceptional circumstances. Alternative wording has been suggested by Northumbrian Water that we will look to include in the plan going forward.	As per changes recommended for comment DBDLP734
Mr David	Darlington Friends of the Earth			DBDLP201	Policy DC 4	Flood Risk & Sustainable Drainage	Neutral	Concern raised if water runoff becomes contaminated.	The Environment Agency has suggested strengthening the policy approach to where contamination may exist to protect the quality of the water	See comment DBDLP1279

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Phillips						Systems (SUDS)			environment (see comment DBDLP1279). These recommendations will be fully taken into account before the publication stage of the local plan.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP599	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Object	Objection raised over clarity of wording and potential of contamination of surface water.	The Environment Agency has suggested strengthening the policy approach to where contamination may exist to protect the quality of the water environment (see comment DBDLP1279). These recommendations will be fully taken into account before the publication stage of the local plan.	See comment DBDLP1279.
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP675	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Neutral	Further reference should be made to methods of water harvesting and retention and the role of underground storage (although this should be discouraged in the Town Centre and SPD Zone 1 where surface habitat creation should be prioritised).	The Council's Design of New Development SPD contains additional guidance on sustainable drainage and cross reference will be made to this in the reasoned justification for Policy DC 4.	Insert: g. Opportunities for rainwater harvesting are utilised where appropriate. Cross reference to Design of New Development SPD in the reasoned justification.
Mrs Laura Roberts	Northumbrian Water			DBDLP734	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Support	General support for policy as drafted. Suggested additional wording to strengthen the approach to sewerage infrastructure and the avoidance of discharging surface water to the public sewerage system. Strengthened wording is also proposed in relation to integration of SUDS. Onus should be on developers to deliver SUDS and only excluded in exceptional circumstances.	Proposals to alter and strengthen wording are appropriate and will be incorporated into the plan.	Include: ***"To ensure that growth can be accommodated sustainably by the sewerage infrastructure, the policy requires that in all locations surface water should be separated, with any surface water runoff entering the sewerage system being minimised and controlled. The priority is to avoid using public sewers wherever possible for the disposal of surface water. If a connection to the public sewerage network is the only option, there is a need for onsite attenuation to minimise and control the flows leaving the site".*** *and* *"all new major development sites will be **required** to incorporate SUDS"*

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Mr Roger Fitzpatrick-Odahamier				DBDLP979	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Object	Objection raised over concerns that built development (particularly Skerningham) with increased quantities of impermeable surfaces will lead to surface water drainage issues. Increased levels of surface water runoff also leads to an increased rate of pollutant transfer which requires additional treatment.	Areas at risk of surface water flooding have been taken into account in the layout of the Skerningham masterplan. Development proposals will also have to meet the criteria within policy DC 4, in terms of incorporating sustainable drainage systems (giving priority to natural drainage features and integrating green infrastructure) and limiting water runoff to greenfield rates. All major developments will also be required to submit a drainage plan to show the site drainage can be adequately dealt with. The Environment Agency has suggested strengthening the policy approach to where contamination may exist to protect the quality of the water environment (see comment DBDLP1279). Additional criteria is proposed for the policy.	See comment DBDLP1279.
Marion Williams	Environment Agency			DBDLP1279	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Neutral	Recommend that this policy advises developers of potential groundwater constraints in the Darlington area. It is also recommended that if SUDS are to be incorporated into developments that the suitability of the final drainage scheme is taken into consideration. Care should be taken to ensure that SUDS which speed up infiltration to ground will not encourage leaching of pollutants into the groundwater aquifer or nearby surface water bodies. A groundwater risk assessment should be taken as part of a site specific FRA or EIA. The level of assessment should be proportionate to the potential risk/level of concern now and in the future. Policies recommended to cover:	Policy to be redrafted to incorporate the recommendations of the Environment Agency with regard to development on contaminated land and development that may affect controlled waters.	Alter title of policy DC 4 to Flood Risk & Water Management Additional text to be added to the end of policy DC 4: New developments should make an assessment of and address via mitigation measures where required, any risks from the construction and proposed use of the site to underlying groundwater, watercourses and other surface waters, in order to protect these resources and prevent contamination. Paragraph to be added to supporting text of policy DC 4, after para 5.4.9. Water resources are a particularly vulnerable aspect of the environment and it is important that groundwater, watercourses and other surface waters are protected from contamination. Darlington lies across a principal aquifer, Magnesium Limestone, a highly sensitive environmental receptor and an important source of water for a large number of public, private and industrial supplies. Pollutants can easily permeate soils

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								• Development on Brownfield and Contaminated Land • Development which could affect Controlled Waters		and contaminate groundwater and development can also affect the hydrology of the area. Once contaminated, it is very difficult and costly, if not impossible, to clean ground water. Where risks to controlled waters are identified as part of a development appropriate remediation and the implementation of mitigation measures will be required to prevent contamination and to protect resources. If potentially polluting materials are to be used/stored either during construction works or as part of the new land use, sufficient prevention and maintenance measures should be incorporated into the development proposals. Gypsum, which is readily dissolved by flowing underground water, underlies parts of the Darlington area. Developers will need to satisfy themselves and the Local Planning Authority that their proposals for development will not be affected by this geological feature. Additional criteria to be added to policy DC 1 Sustainable Design Principles: That proposals for development on land which is affected by contamination will be permitted only if the applicant can demonstrate that the site is suitable for the proposed use and does not result in unacceptable risks to human health or the environment. Paragraph to be added to supporting text of policy DC 1 after para 5.1.14: Development on Brownfield sites and land which may be affected by contamination Brownfield sites selected for redevelopment may be contaminated as a result of previous uses. It is desirable that such sites which are otherwise suitable for development are brought back into productive use, but it is essential that the health and wellbeing of construction workers or the end users of any development are not put at unacceptable risk. Therefore, proposals for development on land which is likely to be affected by contamination will be

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										permitted only if the applicant can demonstrate that the site is or will made be safe for the proposed development and surroundings. The Council will have regard to Government and other appropriate regional guidance when assessing land contamination reports submitted as part of the planning process. In considering outline applications, sufficient information will be required to enable the Council to be satisfied that the development can be carried out and used safely, and that any outstanding problems are capable of solution and can be dealt with as matters of detail.
Ms Julie Nixon				DBDLP325	6	HOUSING	Object	Objections and concerns raised to housing plan: • Impacts on the natural environment • Loss of habitats and wildlife. • Loss of land for food production. • Green spaces are important for physical health, mental health and general wellbeing. • More housing will result in increased traffic and congestion which will subsequently effect health via air pollution. • A quarter of homes stand empty. • Brownfield land should be used first. • Infrastructure required to support growth • More homes needed for older people.	Objections noted. The impacts of the Draft Local Plan on the natural environment has been considered via the Housing and Employment Land Availability Assessment and Sustainability Appraisal. The Council is in the process of updating the information it holds on the quantity, quality and distribution of green spaces across the Borough and the outcome of this work may result in an update to the provision standards contained in the Planning Obligations SPD. The Local Plan should be read as a whole and other policies in the plan will influence developments impact on health and wellbeing of residents, including mental health. The plan includes a health and wellbeing policy which encourages developments that support improvements to health and wellbeing in Darlington through a number of measures such as integrating health and community facilities and improving accessibility to green spaces. There are other related policies	Please see officer response on Skerningham Strategic Allocation.

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								Benefits of the natural environment and green spaces referred to including best practice examples of projects, e.g. tree planting schemes, green space enhancement, wetland creation etc. Suggested that we should only attract those people and businesses which will have a positive impact on the borough. Additional development should be kept to a minimum and should promote health, nature, design and sustainability. Examples provided.	on the protection and enhancement of green infrastructure, green infrastructure standards, biodiversity and sustainable design principles. Darlington is also an NHS Healthy New Towns pilot and policies in the emerging Local Plan have been informed by six Darlington Healthy New Towns Design Principles. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Please see officer response for brownfield sites, urban sprawl and empty homes and response on Skerningham Strategic Allocation. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. Policy H 4 aims to encourage a mix of new homes including market and specialised housing suitable for older people.	
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP39	Policy H 1	Housing Requirement	Object	The minimum housing requirement should be set at 492 net additional dwellings per annum equating to at least 9,840 dwellings over the Plan period. It is not sound to use the 8,440 figure given the aspirations for economic growth and the affordable housing need.	Please see officer response on housing requirement and housing target. With regards to catch up on any past under performance please see officer response on housing requirement and standard method. This was considered in the SHMA 2017 Update and an uplift not considered necessary when an assessment of market conditions was undertaken.	Please see officer response on housing requirement and housing target.

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								Additionally there is a need for catch up on any past underperformance. Without prejudice to other representations the Plan should allocate sites in the rural villages, the last sentence in the policy should be rewritten to allow for sites in the rural villages to be developed when there is not a 5 year supply including a 20% buffer. The reference to development limits additionally needs to be removed, as drawn they not reflecting the position on the ground. Following wording suggested; *"At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the 5 year land requirement including 20 % buffer, sustainable housing sites that would both make a positive contribution to the five year supply of housing land and be well related to the main urban area, service villages (as defined in SH1) or rural villages (as defined in SH2) will be supported. Such proposals should comprise of sustainable development and be consistent with relevant national and Local Plan policies".*	The allocation of sites in rural villages does not accord with the locational strategy of the Draft Local Plan. It is considered that the most sustainable sites for new housing development are located within and adjacent to the main urban area and at the larger service villages. This also applies to the suggested rewording of the final paragraph of H 1 which is not considered appropriate. Development limits have been updated in the Draft Local Plan. Some alterations have been highlighted in comments received on the Draft Local Plan. Changes will be made where necessary.	
Joanne Harding	Home Builders Federation			DBDLP 783	Policy H 1	Housing Requirement	Object	HBF support decision to set a housing figure above the governments standard method approach, to help support sustainable development, to boost	Please see officer response on housing requirement and housing target and the response on the five year supply fall-back position.	Please see officer response on housing requirement and housing target and the response on the five year supply fall-back position.

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								housing supply and to support economic prosperity. The Housing requirement could be confusing as it provides two requirement figures. The HBF recommend using 492 dwellings per annum as the housing requirement as identified in the SHMA 2017 update rather than introducing a lower figure. Concerns regarding the final paragraph of H1. HBF support the need to take action where there is not a five year housing land supply, the solution proposed does not seem appropriate. It would be expected that regardless of supply the Council would be accepting of sites that are sustainable, consistent with relevant national and Local Plan policies and make a contribution to the supply. A more proactive approach should be taken.		
	Hellens Land	mr Baker		DBDLP 791	Policy H 1	Housing Requirement	Object	Hellens Land supports the approach taken to identifying and meeting the objectively assessed housing need in Darlington. We support the Council's approach of identifying a figure based on the economic needs of the authority not the demographic projection which would lead to a fall in working age persons. This approach is in line with both existing and emerging planning policy guidance. Clarification is needed in Policy H1 however to ensure it is clear there is alignment between the objectively assessed housing need and housing requirement in Policy	Comments noted. Please see officer response on housing requirement and housing target. If a five year supply of housing land can not be demonstrated allocated sites will still be looked upon positively. It's not considered necessary to alter the policy.	Please see officer response on housing requirement and housing target.

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								H1. Suggested that the policy is amended to remove reference to the lower requirement of 422 dpa. Support the Council's proposal to release additional sustainable land in Darlington where there is no five year supply, however the policy should be clear that this should not come at the expense of allocated sites and that support should be given to allocated sites, particularly the strategic scale allocations, to increase their delivery before alternative and potentially competing sites are brought forward.		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP836	Policy H 1	Housing Requirement	Object	Skerningham Estates Ltd support the Council's minimum requirement of 492 net additional dwellings per annum. For Darlington the standard methodology would result in a future housing need of 181 dwellings per annum. The Government is clear that the standard methodology is a minimum starting point. Draft revised Planning Practice Guidance confirmed that it is still appropriate for higher figures to be tested on the basis of employment, infrastructure, affordable housing and other factors. Clarification is needed in policy H1 to ensure there is clear alignment between the objectively assessed housing need and the housing requirement. Amendment suggested to set a minimum housing requirement within the policy of 492 dwellings per annum and remove the lower figure.	Comments noted. Please see officer response on housing requirement and housing target.	Please see officer response on housing requirement and housing target.

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								Lichfields carried out an assessment of Darlington's housing need which came to a figure of 480 dwellings per annum. This figure would meet population and household growth, economic led needs and an uplift to help meet affordable housing needs. This supports the housing requirement identified in policy H1. Concerns raised regarding the impacts of using the standard methodology for assessing housing need in the north east. Reliance on household projections for the standard method which results in lower housing need figures for authorities in the north east compared to current requirements which are based on economic led scenarios. Future aspirations of the north east are not reflected in the standard method. Issue raised that 2016 based population projections which underpin the standard method are now notably lower than previous projections. This will effect the standard method figures when household projections are published in Sept 2018. There is an intention from the Government for the standard method to yield nationally a figure which is broadly close to ensuring that 300,000 homes are built per year. In the event of a significant change to the underlying figures the Government intends to address this through changes to the methodology.		

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	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP854	Policy H 1	Housing Requirement	Object	NWL broadly support the Council's minimum housing requirement of 492 net additional dwellings per annum over the period 2016 to 2036 and particularly supports reference to this being a minimum requirement. Concerns raised regarding the final para of H1 when a five year supply cannot be demonstrated. This element of Policy H1 is at odds with other policies within the local plan (which support development beyond the limits of rural villages to meet rural and functional needs and within the development limits of rural villages) and also the NPPF. Paragraph 11 of the 2018 NPPF, when read in conjunction with Footnote 7, confirms that, where there is no five-year supply (and therefore policies are out-of-date), planning permission should be granted unless the criteria identified apply. A similar provision is set out within the 2012 NPPF (Paragraph 14). The application of a sequential approach, in which sites only in urban areas and service villages are released where there is no five-year supply, is not consistent with national planning policy and therefore this element of the policy is not sound.	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.
Amy ward	Planning Manager Barratt Homes			DBDLP1003	Policy H 1	Housing Requirement	Object	Confusion over the wording of the policy as there appears to be a minimum target and another target. Some clarity requested. Supportive of the higher Local Plan target of 492 dwellings per annum. The SHMA Update 2017 identifies the objectively assessed housing need as 492 dwellings per annum in line with the Local Plan	Please see officer response on housing requirement and housing target, and response on five year land supply fall-back position.	Please see officer response on housing requirement and housing target, and response on five year land supply fall-back position.

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								housing target. Barratt Homes therefore recommend that the Council use the Local Plan housing target. The Council should calculate the five year supply position on the higher Local Plan housing target - 492 dwellings. Concerns raised regarding the final paragraph of H1 - implies that the Council will only consider sustainable sites for development where there is not a five year land supply. Regardless of supply the Council should be accepting of sites that are sustainable, consistent with relevant national and Local Plan policies and make a contribution to the five year land supply. H1 to be reworded accordingly.		
Mr John Fleming	Gladman Developments			DBDLP1080	Policy H 1	Housing Requirement	Neutral	Concern that the approach in the policy will not deliver the borough's full OAN for housing. The SHMA 2017 update identifies an OAN of 492 dwellings per annum, as such the Council should be seeking to meet this figure in full. The Council's five year land supply position should be tested against 492 dwellings figure rather than 422 dwellings per annum as this is an underestimation of actual need. Gladman are supportive of the final paragraph of H1 however consider that this element of the policy should go further to provide flexibility required by national	Please see officer response on housing requirement and housing target, and officer response on five year supply-fall back position.	Please see officer response on housing requirement and housing target, and officer response on five year supply-fall back position.

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								policy to ensure housing needs are met in full over the duration of the plan period and recommend that this approach is used even in circumstances where the Council can demonstrate a five year supply. Recommended to set a criteria based approach to give the Council control over sites coming forward instead of relying on a reactive measure in circumstances where the Council is no longer able to demonstrate a five year supply.		
Paul Hunt	Persimmon Homes			DBDLP1183	Policy H 1	Housing Requirement	Object	Housing requirement is confusing as it provides two housing requirement figures, one as a minimum requirement and one as a local plan target. Given that the OAN figure of 492 net additional dwellings per annum has been clearly and robustly evidenced within the SHMA, any attempt by the Council to introduce a housing requirement lower than this figure is considered to be an unsound approach. The 492 figure should also be used for calculating the five year land supply. Persimmon Homes support the need to take action where there is not a five-year housing land supply, the solution proposed within this policy does not necessarily seem appropriate. Persimmon Homes would expect that regardless of supply, the Council would be accepting of sites that are sustainable, consistent with relevant national and Local Plan policies and make a contribution to the five-year	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position. In addition paragraph 6.2.9 of the Draft Local Plan does state that if there is persistent and prolonged under delivery of housing, a review of the housing chapter and the housing allocations will be undertaken in order to resolve the situation.	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.

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								supply. Therefore, Persimmon Homes would look for the Council to be taking a more pro-active approach if there is a period where there is no longer a demonstrable five-year supply of sites. Persimmon Homes suggests that a pro active approach of a plan review, when there is no longer a demonstrable five-year supply of sites.		
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP 1130	Policy H 1	Housing Requirement	Object	The housing requirement as set out in Policy H1 is strongly supported as the minimum housing requirement. Uplifts recommended in the SHMA 2017 to accommodate employment growth and the need for bedspaces in class C2 dwellings. To meet the full Objectively Assessed Need the Council should therefore consider increasing the housing allocation to a total net minimum requirement of 9,840 dwellings. This could include the increase of housing allocated within Strategic Allocations.	Comments noted. Please see officer response on housing requirement and housing target. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. Contributions from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	Please see officer response on housing requirement and housing target.
N/A Darlington Farmers Auction Mart		Mr Christopher Martin	WYG	DBDLP 1112	Policy H 1	Housing Requirement	Object	DFAM objects to this approach of two housing requirement figures and believes it creates confusion for developers. As such, this approach can be regarded	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.	Please see officer response on housing requirement and housing target, and officer response on five year supply-fall back position.

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N/A								as unsound on the basis of being ineffective. Positive approach of final paragraph supported, however it should be the case that the Council should be supporting sustainable sites anyway. This part of the policy is unsound. Recommended that the Council need to be more proactive in its approach to examining housing land supply.		
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1164	Policy H 1	Housing Requirement	Object	Reference is made to Appendix A in the policy. It is assumed that there is scope for deviations from the trajectory. More explicit wording should be used to allow for greater flexibility to the delivery of housing to provide more positive opportunities.	Comments noted. Wording of the policy to be amended accordingly.	Policy H 1 to be amended as follows: It is anticipated that the sites will be delivered in accordance with the housing trajectory in Appendix A which indicates that a continuous five-year supply of housing will be maintained throughout the plan period. The trajectory is an approximation of delivery and does not place any phasing restrictions on the sites.
Mr G Raistrick		Mr Joe Ridgeon		DBDLP 1241	Policy H 1	Housing Requirement	Object	The housing requirement as set out in Policy H1 is strongly supported as the minimum housing requirement. Evidence in the SHMA Update 2017 is noted; uplift to meet the needs of workers related to jobs growth and an uplift to address the need for bedspaces in Class C2 dwellings. To meet the full Objectively Assessed Need the Council should therefore consider increasing the housing allocation to a total net minimum requirement of 9,840 dwellings.	Please see officer response on housing requirement and housing target. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. Contributions from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	Please see officer response on housing requirement and housing target.

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Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP 1391	Policy H 1	Housing Requirement	Neutral	Policy H 1 states that the five year supply position will be calculated utilising the annual net housing requirement figure of 422. Banks Property believe that the target set out which factors in an economic uplift should be used to calculate the five year housing land supply position.	Please see officer response on housing requirement and housing target.	Please see officer response on housing requirement and housing target.
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1230	Policy H 1	Housing Requirement	Object	Local Plan housing target of 492 dwelling per year which includes an uplift to support economic growth aspirations is welcomed. However, to align with conclusions of the 2017 SHMA, Taylor Wimpey consider that the Council must make this the housing requirement rather than including a lower minimum figure. In addition, the Council's 5 year housing land supply position must be tested against the 492 dwellings figure as the using the lower figure would not deliver sufficient housing to meet the identified housing needs. Taylor Wimpey support the final paragraph H1 which provides a mechanism for sites to come forward outside of the development limits in the event that a 5 year housing land supply cannot be demonstrated. Such an approach accords with NPPF.	Please see officer response on housing requirement and housing target. Support to final paragraph of H 1 noted.	Please see officer response on housing requirement and housing target.
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP 1257	Policy H 1	Housing Requirement	Object	The housing requirement as set out in Policy H1 is strongly supported as the minimum housing requirement. Evidence in the SHMA Update 2017 is noted; uplift to meet the needs of workers related to jobs growth and an uplift	Please see officer response on housing requirement and housing target. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is	Please see officer response on housing requirement and housing target.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								to address the need for bedspaces in Class C2 dwellings. To meet the full Objectively Assessed Need the Council should therefore consider increasing the housing allocation to a total net minimum requirement of 9,840 dwellings.	sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. Contributions from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	
Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP1156	Policy H 1	Housing Requirement	Object	Generally supports the identified housing requirement set out within Policy H1, providing two different figures is confusing. Recommend that the Council amend the housing requirement to reflect the identified OAN in the SHMA Update 2017 (492) rather than introducing a second lower figure. Concerns regarding the final paragraph of H1 - generally support this approach of delivering housing in sustainable locations throughout the Borough, would however expect that support would also be provided for appropriate sites that are sustainable, consistent with relevant national and Local Plan policies and make a contribution to the five-year supply throughout the plan period. Suggestion that a more flexible and pro-active approach is taken to ensure that the identified housing need can be met.	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.	Please see officer response on housing requirement and housing target, and officer response on five year supply-fall back position.
Mr Mark Walton		Mr Ian Lyle		DBDLP1217	Policy H 1	Housing Requirement	Object	Support the acknowledgement in the plan that there is a need to deliver substantially above the minimum housing requirement figure of 422 net additional	Please see officer response on housing requirement and housing target, and response on five year land supply fall-back position.	Please see officer response on housing requirement and housing target, and officer response on five year supply-fall back position.

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								dwellings per annum over the plan period. Concern that the suggested 'target' figure of 492 dpa (9840 dwellings over the Plan period) is an absolute ceiling to housing development numbers. Flexibility shown in the final paragraph of Policy H1 welcomed; where the Council appears to commit to granting planning permission for sustainable housing sites at any point during the plan period when it is not able to demonstrate a five-year supply of housing land. In line with comments from the HBF however the Council should take a more proactive stance to bringing sites forward in such circumstances.		
	Godolphin Developments Ltd	Ms Jennifer Nye	Lichfields	DBDLP1264	Policy H 1	Housing Requirement	Object	Supportive of the minimum housing requirement of 492 net additional dwellings per annum. The application of a sequential approach whereby sites only in urban areas and service villages are released where there is no five-year supply is not consistent with national planning policy and therefore this element of the policy is not sound.	Please see officer response to housing requirement and housing target, and response on the five year supply fall-back position.	Please see officer response to housing requirement and housing target, and response on the five year supply fall-back position.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP1308	Policy H 1	Housing Requirement	Object	Concerns with the wording of policy H1 as it can cause uncertainty in the deliverability of the plan's aspirations and lacks clarity. The use of different housing requirement figures is objected to and is considered to fail the policy test of the Framework. 492 dwellings per annum is identified in the SHMA	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position. With regards to identifying additional sites to come forward if delivery is failing; this is not an approach the Council will look to take as it is	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.

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								Update 2017 and should be used as the housing requirement and to assess the five year supply of deliverable housing land. The lower figure of 422 should not be used as it is below the requirement to deliver the jobs growth aspiration of the plan. The use of the term 'target' has the potential to be interpreted as a maximum delivery figure. Such an approach would not be consistent with the Framework and the terminology of 'minimum' should be used in the context of the 492 figure only. Support given to the final paragraph of the policy. Suggestion provided; in order to provide further certainty for communities and the development industry it would be reasonable and appropriate for the policy to identify a number of sites which could come forward where delivery is failing (can't demonstrate a five year supply). Whilst it is considered that the Neasham Road site should be allocated for development within the plan period, allocations as a potential windfall/safeguarded site could present an alternative option. It would be consistent with national policy to consider favourably development proposals which are sustainable and make a contribution towards housing supply, irrespective of the position on the 5 year housing land supply.	considered that there are sufficient sites within the plan to meet housing needs. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. Contributions from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	

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Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1334	Policy H 1	Housing Requirement	Object	Generally supportive of the housing requirement, however providing two different figures is confusing and recommended that the Council amend the housing requirement to reflect the identified OAN in the SHMA Update 2017 (492 dwellings per annum) rather than introducing a second lower figure. Concerns regarding the final paragraph of the policy - general support to the Council's active approach to delivering housing in sustainable locations throughout the Borough, expected that support would also be provided for appropriate sites that are sustainable, consistent with relevant national and Local Plan policies and make a contribution to the five-year supply throughout the plan period. Recommendation that a more flexible and pro-active approach is taken to ensure that the identified housing need can be met. Where sites are unallocated, but considered to be sustainable, these should be considered on their own merits and the policy should not restrict planning applications on such sites being approved. Site at Burtree Lane is available, suitable, achievable and deliverable and can contribute to meeting the needs of Darlington's identified housing need. The site is sustainable and can be delivered in the next 5 years; it is therefore considered that the land at Burtree Lane should be allocated and given priority for development early in the plan period. However, should	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position. With regards to the comments on the site promoted please see officer response to policy H 2 comment ref DBDLP1365.	Please see officer response on housing requirement and housing target, and response on five year supply fall-back position.

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								this not be allocated, the Council should not refuse development on this site on the basis that it is unallocated within the plan.		
Amy ward	Planning Manager Barratt Homes			DBDLP 1010	6.2.5	Paragraph	Object	Five year land supply should be calculated using the higher housing requirement figure of 492 dwellings per annum. Therefore the annual requirement with a 20% buffer is actually 669. Based on the higher requirement, using the Council's proposed deliverable supply for the five year period the Council have a 5.18 year land supply. Based on BDW's reduced 5 year land supply on our assessment of sites, the Council only has a 1.7 year land supply. Recommendation - review the housing requirement figure used in the five year land supply.	Please see officer response on housing requirement and housing target. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to developer interest and physical site constraints.	Please see officer response on housing requirement and housing target.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 608	6.2.7	Paragraph	Object	CPRE objects to the provisions in this paragraph and the corresponding paragraph in policy H1. It effectively renders useless all the policy in the Plan and the consultation process if there is no longer a demonstrable supply of sites to fully meet the five year land requirement.	Please see officer response to five year supply fall-back position. In the circumstance where a five year supply can not be demonstrated the tilted balance of paragraph 11 of the NPPF (2019) will be engaged. Proposals will not be required to accord with policy H 7 Residential Development in the Countryside but they will be assessed against all other relevant national and Local Plan policies. Sites will need to be sustainable, make a positive contribution to the five year supply and be well related to the development limits of the main urban area or service villages.	Please see officer response to five year supply fall-back position.
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP 40	Policy H 2	Housing Allocations	Object	Small sites of 0.5 hectares or less should be allocated in the rural villages. These sites contribute towards range and choice, are likely to be attractive to small and	Allocating sites for housing in the rural villages does not accord with the locational strategy of the Draft Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will	Alter development limits to include the application site area.

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								medium builders and can be readily developable. The balance of site 54 (commitment) remains available in whole or part for further development. In the recent past the built form on this site extended significantly beyond the site subject of planning permission 16/01020/OUT (commitment 54 in Table 6.4).	be able to provide) the level of services, facilities and employment opportunities that are required to support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development. Some housing development will be permitted in rural areas, such as rural exception sites, infill development and housing required to support the rural economy, providing they accord with all relevant national and Local Plan policies. The boundary for site 54 on the policies map includes a wider area than the approved permission (ref 16/01020/OUT) and this is an error. A variation of condition application (18/00501/FUL) was also recently approved for the site which involved alterations to the scheme and a reduction in yield to 9 dwellings. Commitments of less than 10 dwellings will not be included in the Local Plan, as such this site is to be removed from table 6.4, Appendix A Housing Trajectory and the policies map. Any completions from the scheme will however be counted towards meeting the housing requirement and target of the Local Plan. As the scheme is under construction the development limits will be altered to include the application site area.	
Judith Murray				DBDLP 525	Policy H 2	Housing Allocations	Object	Housing requirement is overstated therefore Skerningham allocation is not required. Objection to the use of green space above 'brownfield' sites for development. This does not accord with the National Planning Policy Framework.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the Skerningham strategic site is required to meet these needs.	Please see officer response on Skerningham Strategic Allocation.

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									Please see officer response on Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes.	
Amy ward	Planning Manager Barratt Homes			DBDLP 1011	Policy H 2	Housing Allocations	Object	Ensure all potential allocations are deliverable in light of the policy obligations proposed. Concerns that site 1: Alderman Leach has a lapsed permission which suggests viability constraints. 12 dwellings is unlikely to make this site viable. Concern that Site 95: Beech Crescent East, Heighington is to be accessed from the adjoining committed site. Relying on another site in third party ownership for access is not an appropriate strategy and raises questions regarding the delivery of the site. Resist the creation of a specific housing mix – must be marked led. Should be a flexible approach which recognises that need and demand will vary from area to area and site to site, ensure that the scheme is viable and provides an appropriate mix for the location	Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to developer interest and physical site constraints. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. Advanced discussions have been held with a developer for Site 1 Alderman Leach however the yield proposed for the site has reduced to below 10 dwellings. This site is therefore to be removed from the proposed allocations. The Council has an interest in the adjoining commitment, site 95 Beech Crescent East, Heighington, as such there are no concerns regarding securing access through the adjoining site. Please see officer responses to H 4 housing mix policy.	Remove site 1 Alderman Leach from policy H 2, Appendix A and Appendix B.
Nick McLellan	Story Homes			DBDLP 1044	Policy H 2	Housing Allocations	Support	Story Homes broadly supports, subject to minor changes, the Council's approach to allocating site 99 Maxgate Farm, MSG. Support given to site 146 Land south of the railway line and the inclusion of a site for a new primary school in this allocation. As such Story Homes have reviewed the current planning application on site 99 to remove a proposed primary school element	Comments noted. Site yield to be updated as suggested.	Update table 6.3, appendix A and appendix B with new yield.

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								to avoid duplication of future education provision in the village. This enables further capacity for housing on the site with a revised yield of 260 dwellings. The Council should amend the yield for site 99 from 226 units by 2036 to 260 units by 2036. Appendix B Allocation Statements should also be amended to reflect this change.		
Ms Emily Hrycan	Historic England			DBDLP1105	Policy H 2	Housing Allocations	Object	There does not appear to be any robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites (included those that are safeguarded) for development. The SA does not provide any evidence to determine whether the sites can accommodate the quantum of development without harm to the historic environment. Some parts of the SA suggest mitigation measures without any evidence to support their inclusion, whilst others defer all matters to be dealt with at planning application stage. As a result the site specific policies do not provide any mitigation measures to inform development proposals that may come forward for the sites. The Plan and the supporting evidence base including the SA should be amended to ensure that it includes a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for development and to ensure that there are appropriate site specific mitigation measures which will minimise harm to the historic environment in line with the	Objection and comments noted. The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified as part of this work have been included within the policy and/or supporting text.	Housing and Employment Allocation Statements have been updated to reflect Heritage Impact Assessments.

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								requirements of the NPPF and the 1990 Act. Detail and examples provided of how to carry out a robust assessment.		
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1165	Policy H 2	Housing Allocations	Object	Paragraph 4 sets out that identified allocated sites "should address any issues or requirements as set out in Appendix B – Housing Allocation Statements." It is considered that this policy criteria could be perceived as an absolute constraint to development on allocated sites and it would be more beneficial for decision makers to consider allocation statements in the planning balance and work with developers to find solutions. Recommended re-wording to the following; "sites should endeavour to address the issues and requirements as set out in Appendix B – Housing Allocation Statements and where they can't any adverse impact in not doing so should be weighed against the benefits of the scheme to ensure that when it is beneficial to do so, development should be approved without delay…".	Comments noted. Wording of policy to be amended.	Amend the final sentence of the fourth paragraph of policy H 2 Housing Allocations as outlined below: Schemes should satisfactorily address any issues or requirements as set out in Appendix B Housing Allocation Statements.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1309	Policy H 2	Housing Allocations	Object	The policy confirms the identified sites are required to meet the housing 'target' in Policy H1 (492). It also confirms they will be used to evidence a rolling 5 year housing land supply (currently based on the 422 figure). In the context of the above comments, there is possible further confusion with these statements which should be	Please see officer response to housing requirement and housing target. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for	Rectify discrepancies between policy H 2 and Appendix A with regards to sites 41 South Coniscliffe Park and 68 West Park. Please see officer response to housing requirement and housing target.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								clarified with the adoption of the 'target' figure only. Policy approach that site yields are indicative and that unit numbers will be determined through planning applications is supported. There are a number of larger sites which require further evidence to demonstrate that they will be deliverable at the rates envisaged within policy H 2. Under delivery on sites should be assumed. On this basis an appropriate buffer should be included. 20% buffer recommended. Council is encouraged to provide further evidence on delivery. Questioned if site yields have considered policy requirements, including building regulations Part M standards set out in Policy H 4. Discrepancies between policy H 2 and Appendix A Housing Trajectory - sites 41 South Coniscliffe Park and Site 68 West Park. Site comments duplicated against relevant site/policy.	development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. Contributions from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to developer interest and physical site constraints. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. Additional evidence on delivery will be provided at further stages of plan preparation. Comments noted regarding impact of accessibility standards dwellings on site yield. The site yields are however indicative and it is expected that the majority of site yields will be finalised at the planning application stage. It is also considered that there is a sufficient flexibility of sites in the plan to ensure that quantitative housing needs are met. Discrepancies between policy H 2 and Appendix A noted and will be rectified.	
Mrs Gwen Park				DBDLP 243	Table 6.3	Housing Allocations	Neutral	Housing numbers for Skerningham are well over the Government's recommended figure. Concerns raised:	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing	Please see officer response on Skerningham Strategic Allocation.

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								• If only half of the houses were needed or only half the estimated people moved to Darlington which of these areas would be developed. • Could schemes be left half built out. • The golf course has been sold and agreement to be rebuilt at the edge of Skerningham what happens if not all of the houses are required, would the golf course still be rebuilt. • Over what timescales would a decision be made as to whether the estimated number of houses or people be reviewed.	allocations are required to meet these needs. Please see officer response on Skerningham Strategic Allocation. The yield for the Skerningham site is an indicative figure and will be determined at the planning application stage. More generally the NPPF requires Local Plans to be reviewed at least once every five years. During a review consideration will be given as to whether the housing requirement and housing target figures require updating. Development will be phased from the urban edge in a logical manner, alongside required infrastructure. The precise location of development will be determined at the planning application stage.	
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP 379	Table 6.4	Housing Commitments	Object	Neasham Parish Council supports the proposal at Paragraph 6.2.12 against further development of rural villages. It accepts that where permissions have been granted recently under the NPPF framework in the absence of a local plan those consents which can be implemented within their terms must be recognised. However, it is unclear whether site 54 (Neasham Nursery) in table 6.4 is limited to the area of the existing planning consent or whether the "Housing Commitment" is intended to cover the whole of the former Neasham Nursery site. Reserved matters	The boundary for site 54 on the policies map includes a wider area than the approved permission (ref 16/01020/OUT) and this is an error. A variation of condition application (18/00501/FUL) was also recently approved for the site which involved alterations to the scheme and a reduction in yield to 9 dwellings. Commitments of less than 10 dwellings will not be included in the Local Plan, as such this site is to be removed from table 6.4, Appendix A Housing Trajectory and the policies map. Any completions from the scheme will however be counted towards meeting the housing requirement and target of the Local Plan. As the scheme is under construction the development limits	Alter development limits to include the application site area.

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								have now been approved under consent 16/01020/OUT and construction is well under way. The approved development covers approximately one quarter of the whole 4.44 ha site, and extends beyond the present and proposed development limits of Neasham Village. The remainder of the site is in use as agricultural land. Concerns raised as the development of the remainder of the site would be contrary to other policies within the Draft Local Plan and would also go against key sustainability principles.	will be altered to include the application site area.	
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP41	Policy H 3	Development Limits	Object	The use of Development Limits and restricting the development of land is not fully consistent with the NPPF as they are seen to stifle sustainable development, whereas the NPPF seeks a more flexible and positive approach. Development Limits should not be used in the Plan. Without prejudice to the above, the development limits proposed for Neasham appear to have been rolled forward unchanged from the Darlington Local Plan 1997 and do not reflect circumstances on the ground. It is unsound for example that the dwellings currently being delivered on the site subject of planning permission 16/01020/OUT are outwith Development Limits and therefore will be subject of countryside policies.	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such development limits are to be utilised in the emerging Local Plan. The boundary for site 54 on the policies map includes a wider area than the approved permission (ref 16/01020/OUT) and this is an error. A variation of condition application (18/00501/FUL) was also recently approved for the site which involved alterations to the scheme and a reduction in yield to 9 dwellings.	Alter development limits to include the application site area.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
									Commitments of less than 10 dwellings will not be included in the Local Plan, as such this site is to be removed from table 6.4, Appendix A Housing Trajectory and the policies map. Any completions from the scheme will however be counted towards meeting the housing requirement and target of the Local Plan. As the scheme is under construction the development limits will be altered to include the application site area.	
Stephen Bibby				DBDLP 482	Policy H 3	Development Limits	Object	The Skerningham allocation contradicts the statements within paragraph 6.3.1 related to policy H 3 Development Limits. The site will: • Destroy existing habitats and utilities: trees, woodland, meadow, hedgerows & pathways; Once gone it will never return. • Be extremely large and will contribute to blurring the identities of existing communities, while creating something so huge that it would potentially draw further interest away from the town centre. Concern that this would be a satellite, and not genuinely part of Darlington.	Please see officer response on Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes for further detail. The development limits have been extended to include the proposed strategic development locations. Skerningham is to be planned for as a single cohesive community. Barmpton and Great Burdon will remain distinctly separate from the strategic site which is illustrated in figure 6.1 Skerningham Masterplan Framework. The site is to be well integrated with the surrounding residential areas of Whinfield and Harrowgate Hill. Policy H 10 Skerningham Strategic Allocation sets out that the site will provide a centrally located and well connected neighbourhood centre providing supporting local community facilities. These facilities are to meet the day to day needs of residents and it is not the intention that they will detract from the town centre. For main town centre uses the Local Plan advocates a town centre first approach which is set out in policy TC 1.	Please see officer response on Skerningham Strategic Allocation.

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Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP370	Policy H 3	Development Limits	Object	Objection to the extension of Development Limits into the countryside. Many of the extensions into the countryside are unnecessary if reasonable housing figures are adopted. Concerns regarding the Skerningham Strategic Allocation: • Loss of Grade 3 arable land. • Loss of woodland and amenity space with regard to the Skerningham Community Woodland/Counrtyside Park. • The Skerningham Strategic Allocation is at odds with the Darlington Green Infrastructure Strategy on numerous grounds.	Please see officer response on housing requirement and standard method, response on Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs. The development limits have been extended to include the proposed strategic development locations.	Please see officer response on Skerningham Strategic Allocation.
Mrs Lisa Bramfitt				DBDLP546	Policy H 3	Development Limits	Object	Paragraph 6.3.1 is fundamentally flawed. It will: • Destroy existing habitats and utilities: trees, woodland, meadow, hedgerows & pathways. • Such a large site will reduce the clarity of existing communities, while creating something that will potentially draw further interest away from the town centre. This has already been witnessed	No reference is made to a particular site however it is assumed that the comments are in relation to Skerningham strategic allocation. Please see officer response on Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes. The development limits have been extended to include the proposed strategic development locations. Policy H 10 Skerningham Strategic Allocation sets out that the site will	Please see officer response on Skerningham Strategic Allocation.

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								in Ingleby Barwick and their issues are well documented.	provide a centrally located and well connected neighbourhood centre providing supporting local community facilities. These facilities are to meet the day to day needs of residents and it is not the intention that they will detract from the town centre. For main town centre uses the Local Plan advocates a town centre first approach which is set out in policy TC 1.	
e-Anne arrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1022	Policy H 3	Development Limits	Object	Paragraph 69 of the NPPF states that neighbourhood plan groups should consider the opportunities for allocating small and medium sized sites that are suitable for housing. The draft Local Plan ignores this detailed work undertaken by the local community in the Draft Low Coniscliffe and Merrybent Neighbourhood Plan. LCMPC therefore object to the settlement limits proposed on the policies map for Low Coniscliffe and Merrybent.	Development limits can be altered to reflect the planning permission which is under construction for three dwellings on the Merrybent Nursery site (ref 16/00496/FUL). The proposed infill site by the community at Low Coniscliffe is included within the development limits of the Draft Local Plan. The two small housing sites proposed at Merrybent in the neighbourhood plan (to the north west and south east of the linear settlement) do not accord with the locational strategy for new housing development in the Draft Local Plan. New housing is focused to the main urban area and the larger service villages as it is considered that these are the most sustainable locations for new housing development. As such the development limits have not been amended to reflect these two sites within the neighbourhood plan.	Alter development limits at Merrybent to include Merrybent Nursery site which is under construction (ref 16/00496/FUL).
Mr David Clark				DBDLP 60	6.3.1	Paragraph	Object	Allocation of Skerningham site is contrary to the aims of this paragraph. Concerns raised: • The area is open countryside of natural outstanding beauty. • Site includes a burial site and medieval village with has been	Please see officers response on Skerningham Strategic Allocation.	Please see officer response on Skerningham Strategic Allocation.

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								missed from Appendix C. • The area is beautiful natural woodland - Skerningham Community Woodland covers more than 10ha and includes rare black poplar trees and many footpaths all of which have received funding. Concerns regarding impact of development on trees. New woodland also being developed by a community forestry group. • Loss of identities of existing settlements. • Will destroy the countryside used by residents for recreational activities which contributes to mental health.		
Joanne Harding	Home Builders Federation			DBDLP804	Policy H 4	Housing Mix	Object	If the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the PPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Darlington which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and	Amendments to paragraph 3 of policy H 4: To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) will apply to new dwellings subject to consideration of site suitability and site viability: • 80% of all new dwellings will meet category 2 requirements (accessible and adaptable dwellings). • ~~10% of market housing will meet category 3 requirements (wheelchair user dwellings)~~ • 9% ~~affordable housing~~of all new dwellings will meet category 3

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								of the existing stock; how the needs vary across different housing tenures; and the overall viability. Evidence provided in Part 2 of the SHMA 2015 is severely lacking. This lack of evidence does question how the percentages identified in the policy were derived. No further information is provided in relation to the adaptability and accessibility of the existing stock, or the size, location, type and quality of dwellings needed based on future demand. PPG also states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (ID: 56-009). Therefore, there will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes. The PPG is clear that 'local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied' (ID: 56-008). This does	will consider the requirements of the policy. Amendments are proposed to the policy to address the issues of site constraints and local authority nomination for category 3 wheelchair user dwellings.	requirements (a) or (b) (wheelchair user dwellings) . Where the local authority is responsible for allocating or nominating a person to live in that dwelling, homes should meet building regulation M4 (3) (2) (b). When providing for wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need in the local area. Where there is no specific need identified, then M4 (3) (a) will apply, to allow simple adaptation of the dwelling to meet the future needs of wheelchair users.

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								not seem to have been taken into account within this policy. The HBF does not consider that this policy is required, it is considered that local needs can be met without the introduction of the optional housing standards. However, if the Council wish to pursue this policy the HBF recommends the Council ensure that an appropriate evidence base, including full viability testing, is available to support this policy in line with that set out in the PPG, that each of the requirements for consideration as set out in the PPG are contained within the policy and that appropriate viability and feasibility clauses are provided. The HBF also recommend that a transitional period is included within the policy to allow for homebuilders to adjust to the new requirements.		
Joanne Harding	Home Builders Federation			DBDLP800	Policy H 4	Housing Mix	Object	HBF generally supportive of policy approach. It is important that housing delivery will not be compromised or stalled due to overly prescriptive requirements or need to produce further evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The Council need to be aware that the SHMA will only ever identify current deficits and reflects a snap-shot in time. The HBF would like to ensure greater flexibility within this	It is considered that the policy does have sufficient flexibility. Additional evidence relating to housing need can be submitted to support a planning application. Additional text is proposed to make it clear that a sites location and physical constraints should be considered when proposing a suitable housing mix. It is not considered necessary to add any policy wording relating to viability, however issues of housing mix and viability can be negotiate at the planning application stage.	Text to be added to the end of the first paragraph of policy H 4. ...within the most up to date Strategic Housing Market Assessment or by other evidence submitted in support of a planning application. A suitable housing mix should also give consideration to a sites location, physical constraints and the surrounding context.

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								policy to acknowledge that the mix can vary both geographically and over the plan period.		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP838	Policy H 4	Housing Mix	Object	Support for the aim of the policy. It would be appropriate for the policy to confirm that 'other evidence' could be provided by an applicant at the time of any planning application. Allowing evidence to be submitted by the applicant would ensure up-to-date market evidence was used to support a particularly housing mix is brought forward. Reliance on the SHMA could render a proposed housing mix out of date given that a SHMA may not be updated on a regular basis by the Council.	Support and comments noted. Additional text to be added to the policy to provide the clarification requested.	Text to be added to the end of the first paragraph of policy H 4. ...within the most up to date Strategic Housing Market Assessment or by other evidence submitted in support of a planning application.
	Hellens Land	mr Baker		DBDLP797	Policy H 4	Housing Mix	Object	It is not clear if the accessibility standards are for the plan / Borough as a whole or for individual applications. If it is for the latter we would have concerns about the inflexibility of this approach. For example it may not be appropriate to require the provision of category 3 dwellings on some individual planning applications associated with strategic allocations such as Greater Faverdale.	Comments noted regarding the clarity of the policy. Policy can be amended to make it clear that the requirements are for new housing developments. Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan.	Additional text added to policy H 4 paragraph 3: ...the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) will apply to new dwellings, subject to site viability:

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	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP857	Policy H 4	Housing Mix	Object	While providing a mix of house types, sizes and tenures is supported, it would be useful for the policy or supporting text to qualify whether 'other evidence' could be provided by a developer or whether this refers solely to other evidence produced by the Council. Reliance on the SHMA could render a proposed housing mix out of date given that a SHMA may not be updated on a regular basis by the Council.	Support and comments noted. Additional text to be added to the policy to provide the clarification requested.	Text to be added to the end of the first paragraph of policy H 4. ...within the most up to date Strategic Housing Market Assessment or by other evidence submitted in support of a planning application.
Amy ward	Planning Manager Barratt Homes			DBDLP1013	Policy H 4	Housing Mix	Object	General support for the aim of the policy. BDW would resist the creation of a specific housing mix policy and recommend a flexible approach. Housing mix must be market led, there is a massive difference between housing need and housing demand which must be recognised. BDW is particularly concerned about Darlington's proposed policy to provide accessible, adaptable and wheelchair user houses. In terms of percent splits it is not realistic for 100% of all houses to meet M4(2) and M4(3) standards. The policy must be viability tested in line with para 173 of the NPPF. Wheelchair user homes also require more land take which will impact on site yields and can increase the price of these dwellings. Evidence provided in Part 2 of the SHMA 2015 is severely lacking. This lack of evidence does question how the percentages	It is considered that the policy is sufficiently flexible. Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy. Comments noted regarding impact of wheelchair user dwellings on site yield. The site yields are however indicative and it is expected that the majority of site yields will be finalised at the planning application stage. It is also considered that there is a sufficient flexibility of sites in the plan to ensure that quantitative housing needs are met.	Amendments to paragraph 3 of policy H 4: To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) will apply to new dwellings subject to consideration of site suitability and site viability: • 80% of all new dwellings will meet category 2 requirements (accessible and adaptable dwellings). • ~~10% of market housing will meet category 3 requirements (wheelchair user dwellings)~~ • 9% ~~affordable housing~~of all new dwellings will meet category 3 requirements (a) or (b) (wheelchair user dwellings) . Where the local authority is responsible for allocating or nominating a person to live in that dwelling, homes should meet building regulation M4 (3) (2) (b). When providing for wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need in the local area. Where there is no specific need identified, then M4 (3) (a) will apply, to allow simple adaptation of the dwelling to meet the future needs of wheelchair users.

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								identified in the policy were derived. PPG also states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (ID: 56-009). Therefore, there will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes. The PPG is clear that 'local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied' (ID: 56-008). This does not seem to have been taken into account within this policy. BDW would urge the Council to reconsider the introduction of this policy. If the Council wish to pursue this policy they must ensure it is consistent with national policy, justified by an appropriate evidence base, including full viability testing. Consideration must also be given to the introduction of a more realistic % requirement.	Amendments are proposed to the policy to address the issues of site constraints and local authority nomination for category 3 wheelchair user dwellings.	

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Mr John Fleming	Gladman Developments			DBDLP1086	Policy H 4	Housing Mix	Object	General support for the aim of the policy. It is important to note that the housing mix as identified in the Council's latest evidence base will only provide a snapshot in time in relation to the current housing needs. As such, the policy should provide for flexibility going forward so that the Plan is able to respond to changes in circumstances at the time of an application being submitted to the local planning authority. Concerns raised regarding the accessibility standards set out in policy H 4. The optional technical standards should be fully evidenced on an assessment of need and viability. Given the rather prescriptive requirements proposed under this policy it appears to lack the necessary evidence base to support their justification. In addition, the PPG is also clear on policies for wheelchair accessible homes and that these should only be applied to dwellings that are the responsibility of the local planning authority. Accordingly, their needs to be further detail in terms of how the Council will engage with key stakeholders, developers and housing associations and how this element of the policy will be implemented over the plan period.	The policy does provide flexibility as it references that other evidence can be utilised with regards to housing needs. Additional text is to be added to clarify that such evidence can be submitted with a planning application. Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy. Amendments are proposed to the policy to address the issues of site constraints and local authority nomination for category 3 wheelchair user dwellings.	Text to be added to the end of the first paragraph of policy H 4. ...within the most up to date Strategic Housing Market Assessment or by other evidence submitted in support of a planning application. Amendments to paragraph 3 of policy H 4: To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) will apply to new dwellings subject to consideration of site suitability and site viability: • 80% of all new dwellings will meet category 2 requirements (accessible and adaptable dwellings). • ~~10% of market housing will meet category 3 requirements (wheelchair user dwellings)~~ • 9% ~~affordable housing~~of all new dwellings will meet category 3 requirements (a) or (b) (wheelchair user dwellings) . Where the local authority is responsible for allocating or nominating a person to live in that dwelling, homes should meet building regulation M4 (3) (2) (b). When providing for wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need in the local area. Where there is no specific need identified, then M4 (3) (a) will apply, to allow simple adaptation of the dwelling to meet the future needs of wheelchair users.
Paul Hunt	Persimmon Homes			DBDLP1188	Policy H 4	Housing Mix	Neutral	If the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The	Amendments to paragraph 3 of policy H 4: To ensure that new homes provide quality living environments for residents both now and in the future,

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								PPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Darlington which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. Evidence provided in Part 2 of the SHMA 2015 is severely lacking. This lack of evidence does question how the percentages identified in the policy were derived. PPG also states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (ID: 56-009). Therefore, there will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes. The PPG is clear that 'local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied' (ID: 56-008). This does not seem to have been taken into account within this policy.	evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy. Amendments are proposed to the policy to address the issues of site constraints and local authority nomination for category 3 wheelchair user dwellings. It is not considered necessary to provide a transitional period for the policy requirements as they have been supported by evidence and subject to viability testing.	the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) will apply to new dwellings subject to consideration of site suitability and site viability: • 80% of all new dwellings will meet category 2 requirements (accessible and adaptable dwellings). • ~~10% of market housing will meet category 3 requirements (wheelchair user dwellings)~~ • 9% ~~affordable housing~~of all new dwellings will meet category 3 requirements (a) or (b) (wheelchair user dwellings) . Where the local authority is responsible for allocating or nominating a person to live in that dwelling, homes should meet building regulation M4 (3) (2) (b). When providing for wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need in the local area. Where there is no specific need identified, then M4 (3) (a) will apply, to allow simple adaptation of the dwelling to meet the future needs of wheelchair users.

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								Persimmon does not consider that this policy is required, it is considered that local needs can be met without the introduction of the optional housing standards. However, if the Council wish to pursue this policy the Council should ensure that an appropriate evidence base is available. Recommended that a transitional period is included within the policy to allow for homebuilders to adjust to the new requirements.		
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1168	Policy H 4	Housing Mix	Support	Bellway support the principle of this policy however consider that the requirement to provide a suitable mix should not be at the detriment of the viability of a scheme. Such provision to account for the viability of a development and site specific considerations and constraints should be made in the policy.	Additional text is proposed to make it clear that a sites location and physical constraints should be considered when proposing a suitable housing mix. It is not considered necessary to add any policy wording relating to viability, however issues of housing mix and viability can be negotiate at the planning application stage.	Text to be added to the end of the first paragraph of policy H 4. ...within the most up to date Strategic Housing Market Assessment or by other evidence submitted in support of a planning application. A suitable housing mix should also give consideration to a sites location, physical constraints and the surrounding context.
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1242	Policy H 4	Housing Mix	Object	Taylor Wimpey would raise concerns over the wording of the first part of Policy H 4 as such policies need to be flexible to respond to changing circumstances over time, individual site issues as well as market demands and therefore such policies must be sufficient flexibility to not impact upon the delivery of housing. Welcome the wording that housing mix can be informed by other evidence. Taylor Wimpey strongly object to the second part of Policy H4 which seeks to introduce optional technical standards above building regulations requirements for accessible and adaptable	It is considered that the policy does afford a level of flexibility to developers as acknowledge with the reference to other evidence. Additional text is proposed to make it clear that a sites location and physical constraints should be considered when proposing a suitable housing mix. Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements.	Text to be added to the end of the first paragraph of policy H 4. ...within the most up to date Strategic Housing Market Assessment or by other evidence submitted in support of a planning application. A suitable housing mix should also give consideration to a sites location, physical constraints and the surrounding context.

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								dwellings. The NPPG advises that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. The requirement will also place unnecessary financial burden on development contrary to the NPPF and no viability evidence has been provided to justify the requirement.	This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy.	
Hellens Land		mr Baker		DBDLP798	Policy H 5	Affordable Housing	Object	The government has sought to introduce flexibility to its definitions of affordable housing to enable innovation within the affordable housing sector and to facilitate the provision of many different tenures of affordable housing to meet the multifaceted needs of local communities. Policy H 5 should allow for changes in the definition of the affordable housing by making reference to the 2018 NPPF or whatever policy supersedes it. This will ensure that the Local Plan is up to date with national planning policy and that it delivers in line with the government's planning objectives.	Comments noted. Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019).	Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019). The glossary (table 12.1) will also be amended accordingly to refer to the latest version of the NPPF.
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP1132	Policy H 5	Affordable Housing	Support	Policy H 5 is generally supported; however, it is considered that the policy should take the opportunity to accord with the affordable housing definition in the revised NPPF as the wording provides additional flexibility and will therefore help increase the delivery of affordable housing. The provision for off-site provision, including is relation to executive housing schemes is supported.	Comments noted. Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019).	Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019). The glossary (table 12.1) will also be amended accordingly to refer to the latest version of the NPPF.

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Mr G Raistrick		Mr Joe Ridgeon		DBDLP1250	Policy H 5	Affordable Housing	Support	Policy H 5 is generally supported; however, it is considered that the policy should take the opportunity to accord with the affordable housing definition in the revised NPPF as the wording provides additional flexibility and will therefore help increase the delivery of affordable housing. The provision for off-site provision, including is relation to executive housing schemes is supported.	Comments noted. Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019).	Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019). The glossary (table 12.1) will also be amended accordingly to refer to the latest version of the NPPF.
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP1243	Policy H 5	Affordable Housing	Neutral	It is not possible to comment on the proposed affordable housing requirements as the Council's Viability Assessment is not available at this stage. For the policy to be effective the Local Plan must include a plan which clearly shows the wards and where the different affordable housing requirements apply. It would also make the plan clearer if the suggested affordable housing requirements for each site are set out within the Housing Allocation Statements at Appendix B of the Local Plan.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. A plan can be included as an appendix to clearly show the wards and the different affordable housing requirements which apply. It is considered that with this change policy H 5 is clear and effective, subsequently it is not necessary to add the affordable requirements to the housing allocation statements in Appendix B.	Addition of a map as an appendices which shows the different affordable housing requirements across the borough. Reference to this to be added to policy H 5.
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP1258	Policy H 5	Affordable Housing	Support	Policy H 5 is generally supported; however, it is considered that the policy should take the opportunity to accord with the affordable housing definition in the revised NPPF as the wording provides additional flexibility and will therefore help increase the delivery of affordable housing.	Comments noted. Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019).	Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019). The glossary (table 12.1) will also be amended accordingly to refer to the latest version of the NPPF.

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Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP1318	Policy H 5	Affordable Housing	Object	Story Homes have significant concern that the affordable housing levels sought by the Local Plan will have significant detrimental impacts on site viability, and ultimately deliverability. It is noted that the plan is not yet supported by a plan wide viability assessment and this must be undertaken in consultation with the house building industry as a matter of urgency before further consultation is undertaken. Any future drafting must take account of the updated affordable housing definition contained within the Framework, and ensure the delivery levels have been appropriately viability tested.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019).	Paragraph 3 of policy H 5 and paragraph 6.5.1 will be updated to reflect the new definition of affordable housing as set out in the NPPF (2019). The glossary (table 12.1) will also be amended accordingly to refer to the latest version of the NPPF.
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP858	Policy H 6	Rural Exceptions	Object	Support for the inclusion of a rural exception site policy. The policy should not be limited to 10 dwellings or less if a larger scheme would meet a greater need.	Support noted. Agreed to remove 10 dwelling threshold from the policy to allow larger schemes which would meet a greater need.	Alter first sentence of policy H 6 Rural Exceptions as outlined below: ~~Small scale a~~Affordable housing schemes ~~of 10 dwellings or less,~~ closely related to the identified development limits of the service villages and rural villages will be permitted providing:
	Godolphin Developments Ltd	Ms Jennifer Nye	Lichfields	DBDLP1271	Policy H 6	Rural Exceptions	Object	This policy should be revised to reflect that rural exception sites can be supported in areas that the Council do not currently identify as a Rural Village, such as Great Stainton and should not limit to 10 dwellings or less if a larger scheme would meet a greater need.	Rural exception sites will only be permitted in the service villages and rural villages as other smaller rural settlements are not considered to be sustainable for residential development. There is also a reasonable spatial distribution of the service villages and rural villages across Darlington. As such it is considered that any needs can be suitably addressed adjacent to these settlements. Agreed to remove 10 dwelling threshold from the policy to allow larger schemes which would meet a greater need.	Alter first sentence of policy H 6 Rural Exceptions as outlined below: ~~Small scale a~~Affordable housing schemes ~~of 10 dwellings or less,~~ closely related to the identified development limits of the service villages and rural villages will be permitted providing:

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Mr Peter Hughes				DBDLP48	6.6.2	Paragraph	Object	Concern that allowing developments of 10 houses or less could lead to piecemeal extension to rural developments. Would prefer a smaller figure for such developments, or they should be identified in this plan.	The approach in policy H 6 Rural Exceptions is set out in national planning policy. Para 77 of the NPPF states, local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. In Part 1 of the SHMA (2015) there is limited spatial evidence on the distribution of affordable housing need. There is no evidence of specific unmet needs for additional affordable housing in the service villages or rural villages. Consequently there is not the evidence to support the allocation of rural exception sites and a more flexible criteria based policy approach is required. Any planning applications for such schemes would also have to adhere to other relevant local and national planning policy. Issues such as impacts on local landscape character and the visual amenity of the surrounding area would also be considered as part of the application process. This would assist to avoid piecemeal development and ensure that schemes are well integrated with existing communities. The 10 dwelling threshold is to be removed from the policy to allow larger schemes which would meet a greater need.	Alter first sentence of policy H 6 Rural Exceptions as outlined below: ~~Small scale a~~Affordable housing schemes ~~of 10 dwellings or less,~~ closely related to the identified development limits of the service villages and rural villages will be permitted providing:
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP859	Policy H 7	Residential Development in the Countryside	Object	The policy should be redrafted to reflect paragraph 79 of NPPF 2018 for dwellings of exceptional design quality.	It is not intended to replicate national policy within the plan. The remainder of Policy H 7 offers local context as to when dwellings may be permissible. A reference to paragraph 79 exceptional design/innovation dwellings will be made in the reasoned justification.	Paragraph 6.7.1 to be updated to read: National planning policy states that isolated new dwellings in the countryside should be avoided. They will only be permitted in the circumstances as outlined in paragraph ~~55~~79 of the NPPF, for example if it can

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										be demonstrated there is a specific need for a rural worker(s) or are of exceptional design quality.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 653	Policy H 8	Housing Intensification	Neutral	Consider this policy would be better as two policies.	Subheadings can be provided to make the two aspects of the policy clearer.	Policy to be split under two subheadings: 1. Subdivision of dwellings to HMO's and self-contained flats; and 2. Backland or garden development.
Ms Emily Hrycan	Historic England			DBDLP 1141	Policy H 8	Housing Intensification	Object	The policy as drafted suggests only those proposals that cause significant adverse impact to an asset will be refused. Allowing anything that is less significant to be approved. This does not accord with the NPPF and weakens the protection afforded to heritage assets in Darlington. Therefore it is suggested that Bullet J be deleted and any proposals for heritage assets be dealt with in historic environment Policy ENV1.	Agree with the suggested change as it was not the intention of the policy weaken the heritage policy or national policy.	Point j. 'A conservation area or a listed building' to be deleted.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 655	6.8.8	Paragraph	Object	The second sentence of this paragraph could allow a use to be established in order to claim that it was previously developed and therefore suitable for backland development.	This sentence does not add to the justification of Policy H 8 and will be deleted.	Delete: 'However, to help support the use of previously developed land and buildings, the Council may permit proposals for development of backland sites in other uses, subject to the criteria above and other relevant policies.'
Mr Richard Branton				DBDLP 74		Skerningham Strategic Allocation	Object	Land in their ownership should be considered/assessed separately from adjoining land by the HELAA (site reference 101). Challenge the status of their land in the HELAA on a number of grounds. Their land should be shown as suitable for housing in the plan.	Please see officer response on the Skerningham Strategic Allocation. The land in your ownership has been assessed separately through the HELAA and SA as requested. The Council can confirm that there is not a designated Local Wildlife Site present on site 101: Land North of Lime Avenue. The site does however contain features of ecological interest and is considered to be a prospective	Please see officer response on the Skerningham Strategic Allocation. The land in question has been assessed separately through the HELAA and SA process.

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								Site 101 does not contain a Local Wildlife Site. An access to the Skerningham site across site 6 from the A167 would be a better option to the one identified further to the north on the masterplan framework. Request that the Council write to the site promoters to clarify the position on their land.	future wildlife site subject to appropriate designation procedures. Development proposals affecting this site will be required to undertake appropriate ecological evaluation, but this does not necessarily rule out development. The Skerningham Strategic Allocation site promoters have been made aware of the fact that the site is not designated as a Local Wildlife Site and have been written to formally as requested. The Masterplan Framework provided at Figures 6.1 and 6.2 of the Draft Local Plan identifies potential principle access points but does not rule out the identification of other potential access points to the site.	
Burney Johnson				DBDLP721		Skerningham Strategic Allocation	Object	Land in their ownership should be considered/assessed separately from adjoining land by the HELAA (site reference 101). Challenge the status of their land in the HELAA on a number of grounds. Their land should be shown as suitable for housing in the plan. Site 101 does not contain a Local Wildlife Site. An access to the Skerningham site across site 6 from the A167 would be a better option to the one identified further to the north on the masterplan framework. Request that the Council write to the site promoters to clarify the position on their land.	Please see officer response on the Skerningham Strategic Allocation. The land in your ownership has been assessed separately through the HELAA and SA as requested. The Council can confirm that there is not a designated Local Wildlife Site present on site 101: Land North of Lime Avenue. The site does however contain features of ecological interest and is considered to be a prospective future wildlife site subject to appropriate designation procedures. Development proposals affecting this site will be required to undertake appropriate ecological evaluation, but this does not necessarily rule out development. The Skerningham Strategic Allocation site promoters have been made aware of the fact that the site is not designated	Please see officer response on the Skerningham Strategic Allocation. The land in question has been assessed separately through the HELAA and SA process.

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									as a Local Wildlife Site and have been written to formally as requested. The Masterplan Framework provided at Figures 6.1 and 6.2 of the Draft Local Plan identifies potential principle access points but does not rule out the identification of other potential access points to the site.	
Mr Robert Henry Howard				DBDLP 630		Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment. There is a great deal of brownfield land that should be developed first. Development will generate extra traffic that will affect wildlife and people's quality of life.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 372	6.10.1	Paragraph	Neutral	The East Coast Mainline forms a barrier to any wholescale development of the site. Development will result in the loss of agricultural land. The relocation of the golf club will impact on Skerningham Community Woodland and permissive Public Rights of Way in the area.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr Phillip Thornberry				DBDLP 46	Policy H 10	Skerningham Strategic Allocation	Object	Objection to Skerningham Strategic Allocation. Concerns raised: • Should be developed as to not encroach on existing housing. • Needs of existing residents considered;	Please see officer response on Skerningham Strategic Allocation. Work on an update to the Open Space Assessment is ongoing and will provide an assessment of the quantity and quality of the borough's open spaces. This work will inform a revision of the Councils Planning	Please see officer response on Skerningham Strategic Allocation.

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								• green spaces, road network and amenities. • Springfield park is a valuable space and should not be developed or exchanged for green spaces in the new Skerningham site.	Obligations SPD the next stage of plan preparation and to ensure adequate provision for open space is made by developments. An infrastructure plan has also been prepared to support the Local Plan and will identify infrastructure required to support new development. Both pieces of supporting evidence base consider current provision for existing communities.	
Mrs Janine Lee				DBDLP 398	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment and result in the loss of the last accessible piece of countryside. Development of this size is not needed and I dispute the Council's housing requirement figures. Object to any loss of Springfield Park and to the proposed road across it. It should be a designated green space. Object to any loss of Green Lane. If a bypass is built any traffic removed from the A1150 will simply be replaced by that from the Skerningham development. The additional traffic will cause congestion, pollution and noise. Development will put a strain on the town's already overstretched services. The relocation of Darlington Golf Club makes no sense.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.

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Valerie Binks				DBDLP170	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. The development would result in the loss of permissive paths and Community Woodland. The area is used for recreation by residents. Object to the relocation of the golf club which will impact on Skerningham Community Woodland. This should go to a public inquiry. The proposed access road onto Whinbush Way will remove the grassy area between Caithness Way and Tayside. Development will put a strain on the town's already overstretched roads and services. Object to the proposed changes to Springfield Park and the impact development will have on public rights of way, including Green lane. Development will destroy the countryside and wildlife habitats.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr Stuart Blake				DBDLP171	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment and result in the loss valuable countryside, wildlife habitats and green space. Priority should be given to the development of brownfield land.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								Dispute the need for this many homes. The additional traffic will cause congestion, pollution, noise and affect road safety. Object to the proposed changes to Springfield Park. Allowing a road across Springfield Park will destroy it. New housing developments with affordable housing result in a higher crime rate.		
Mr Ian Douglas				DBDLP 173	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitat. Dispute the need for this many homes. Development will put a strain on town's already overstretched roads and services. The proposals will destroy one of the best golf courses in County Durham. Object to the proposed changes to Springfield Park.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.
Mr Dixon Binks				DBDLP 182	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. The development would result in the loss of permissive paths and	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								Community Woodland. The area is used for recreation by residents. Object to the relocation of the golf club which will impact on Skerningham Community Woodland. This should go to a public inquiry. The proposed access road onto Whinbush Way will remove the grassy area between Caithness Way and Tayside. Development will put a strain on the town's already overstretched roads and services. Object to the proposed changes to Springfield Park and the impact development will have on public rights of way, including Green lane. Development will destroy the countryside and wildlife habitats.		
Simon Bainbridge				DBDLP 401	Policy H 10	Skerningham Strategic Allocation	Object	This proposal has been led by speculative land agents rather than by the Council. The proposals have no regard to the local community, land ownership, infrastructure or the effect on the town and environment. The proposal is at odds with the Council's Green Infrastructure Strategy and standards and the Brightwater Project. It will have a catastrophic impact on wildlife.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								There is no mention of the medieval village of graves located there. Object to the relocation of the golf club which will impact on Skerningham Community Woodland. How can this be justified.		
Alan William Macnab				DBDLP187	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government estimates are much lower. The new development limit around the Skerningham allocation site will not prevent further housing development taking place in the area reserved for green space. All of the existing community woodland should be retained. The woodland is used as a burial site. Development on the golf club site will remove trees and woodland exposing properties along Green Lane. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside/agricultural land and wildlife habitats. Object to any interference with Green lane bridleway and Springfield Park (an Asset of Community Value). The additional traffic will cause congestion, pollution on roads that	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method. The development limit has been drawn around the entire extent of the Skerningham Strategic Allocation site in the Draft Local Plan in order to allow a comprehensive approach to be taken to the masterplanning of the whole site, and to ensure the delivery of improvements to the Skerne Valley Area alongside development on Darlington's urban edge. The Masterplan Framework (Figure 6.1) illustrates the key principles for the development of the Skerningham site and has been the basis on which the emerging Masterplan is developed. As set out in Policy H 10, the Council will only approve planning applications that adhere with the masterplan for this site, and that deliver the necessary local and strategic infrastructure (including green infrastructure) to support the development. The southern side of the River Skerne Valley is identified on the framework plan as strategic green infrastructure, reflecting the fact that much of this area is identified as part of a Strategic Green Corridor in the Council's Green	Please see officer response on the Skerningham Strategic Allocation.

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								area already heavily congested, especially the A1150.	Infrastructure Strategy. However, until the masterplan is finalised and agreed with the Council the exact extent of the built up area forming the new northern edge of the town is not known and it is therefore not possible to accurately define the extent of the development limit at this stage. The Council will consider the need to amend the development limit around the Skerningham site, to reflect the final position on the extent of the built up area of the site, during future reviews of the Local Plan, due to take place at least every five years.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP211	Policy H 10	Skerningham Strategic Allocation	Object	Objection to Skerningham strategic allocation. Concerns raised. • Not a sustainable site. • Increase in traffic congestion and degradation of air quality. • Should not be building on a flood plain. • Green policy and outputs are not clear. • Green infrastructure buffer zone should be at least 100m from the River Skerne. • It is not clear that the Highways Authority Traffic Modelling justifies the housing allocation or the provision of new roads. • Any new roads should have a 100m green infrastructure buffer zone.	Please see officer response on the Skerningham Strategic Allocation. The emerging Local Plan proposes allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection was informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Policy H 10 and the Skerningham Masterplan Framework set out indicative green infrastructure requirements for the site. The environment chapter, and associated policies, of the Draft Local Plan also set out general requirements on developments with regards to green infrastructure and biodiversity. Paragraph 6.10.12 specifies that in order to create viable ecological	Please see officer response on the Skerningham Strategic Allocation.

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									corridors buffers should measure at least 50 metres.	
Mrs Gwen Park				DBDLP296	Policy H10	Skerningham Strategic Allocation	Object	Object to the scale of development proposed on the site. The road network is not suitable for the additional traffic and will cause congestion, pollution, and affect road safety. Dispute the need for this many homes. The Government figure is much lower. Priority should be given to the development of brownfield land. Reconsider building on greenbelt areas such as Springfield Park and adjacent countryside. A new bypass to link the A1(M) and A66 is overdue and urgently needed. However, traffic removed from the A1150 will simply be replaced by that from the Skerningham development. Object to a road through Springfield Park due to the impact on habitat and wildlife. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and Springfield Park. This will have an impact on resident's health and wellbeing. Building further out of the town centre will encourage people to use cars, and not support the town centre.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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A Makepeace				DBDLP191	Policy H 10	Skerningham Strategic Allocation	Object	Use of the word village should be discontinued as it is misleading. A new development must include adequate infrastructure and services. The development must address and resolve all environmental issues before starting. The development should consider all constraints both on and off the site including the east coast mainline, a proposal for a by-pass, a wind turbine site, and the flood plain.	Policy H 10 Skerningham Strategic Allocation does not use the word village to describe the proposal. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr Colin J Spain				DBDLP192	Policy H 10	Skerningham Strategic Allocation	Object	Even is a link road goes ahead the additional traffic will cause congestion, pollution, noise and affect road safety. Traffic removed from the A1150 will simply be replaced by that from the Skerningham development. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. Development will put a strain on the town's already overstretched services. Priority should be given to the development of brownfield land. Dispute the need for this many homes. The Government figure is much lower.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.

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								Where are all the jobs coming from that would require so many houses, the town centre is struggling? Concerned that development will result in flooding of the River Skerne.		
Maria Jabs				DBDLP 252	Policy H 10	Skerningham Strategic Allocation	Object	This development will increase air, traffic and noise pollution and destroy the natural countryside.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Alex Swainston				DBDLP 254	Policy H 10	Skerningham Strategic Allocation	Object	Object to any link road development. Development would damage wildlife and the well-being of residents. Development will put a strain on the town's already overstretched roads.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Anne Rudkin				DBDLP 257	Policy H 10	Skerningham Strategic Allocation	Object	It represents development in the countryside and a considerable expansion of the development limit contrary to the NPPF. It has not been sufficiently demonstrated that development boundaries need to be extended. Development will adversely affect the character, appearance and nature of the Skerningham Valley and Whinfield area and destroy wildlife habitats. Development will bring noise and air pollution. Object to the loss of recreational facilities such as permissive paths and open spaces (including	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								Springfield Park which is an Asset of Community Value). It will result in the loss of agricultural land. Planned development will have a negative impact on local infrastructure. Development will put a strain on the town's already overstretched roads.		
Allannah Robinson				DBDLP277	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. Development will put a strain on the town's already overstretched roads and services (including schools and doctors). There is no way the A1150 can cope with more traffic. The additional traffic will cause air pollution. Priority should be given to the development of brownfield land. Development will result in the loss of green areas and wildlife habitats. Object to the proposed changes to Springfield Park. This proposal will lead to major congestion. The proposal to relocate the golf club into publicly accessible community woodland is unacceptable.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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Mr John Sudkin				DBDLP292	Policy H10	Skerningham Strategic Allocation	Object	It represents development in the countryside and a considerable expansion of the development limit contrary to the NPPF. It has not been sufficiently demonstrated that development boundaries need to be extended. Development will adversely affect the character, appearance and nature of the Skerningham Valley/countryside and destroy wildlife habitats. Development will being noise and air pollution. Object to the loss of recreational facilities and permissive paths including Springfield Park (which is an Asset of Community Value). It will result in the loss of agricultural land. Planned development will have a negative impact on local infrastructure. Development will put a strain on the town's already overstretched roads.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Ken Walton				DBDLP335	Policy H10	Skerningham Strategic Allocation	Object	Object to the scale of development proposed. More houses will result more traffic, affect road safety and pollution. Development of this site will destroy the local environment	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								and result in the loss of wildlife and open space.		
Ms Julie Nixon				DBDLP330	Policy H10	Skerningham Strategic Allocation	Object	Potentially taking away a woodland burial site is a disgrace, perhaps more of us could consider such a place when needed in the future.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mrs Margaret Moyes				DBDLP342	Policy H10	Skerningham Strategic Allocation	Object	Objection to Skerningham Strategic Allocation. Concerns raised: • This is an area of beautiful and varied countryside. • It is part of the Bright Water project which is used by residents for health and wellbeing. • It has many footpaths and is recommended as an area for walking by the Council. • The woods have been planted with rare native black poplars. • The consultation event ran by Theakston Estates gave no opportunity for written objections. • It would be a tragedy to lose this accessible green belt.	Please see officer response to Skerningham Strategic Allocation. Darlington does not have any designated green belt. This is a formal designation typically found in larger urban areas to prevent settlements merging.	Please see officer response to Skerningham Strategic Allocation.
Mr Ralph Bradley				DBDLP390	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. The development will destroy the Green Belt.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.

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								Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. The area is used for recreation by residents. Development will put a strain on the town's already overstretched roads and services. Even if a link road goes ahead the additional traffic will cause congestion on local roads.	Darlington does not have any designated green belt. This is a formal designation typically found in larger urban areas to prevent settlements merging.	
Mr James Wilson Chalk				DBDLP448	Policy H10	Skerningham Strategic Allocation	Object	The additional traffic will cause congestion. Commuters will shop on the way home and not support local shops. Development will put a strain on the town's already overstretched services, particularly GPs and dental practices. Concerned about the loss of green areas and the effects on climate change, health and recreation. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and green space.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr Paul Gannon				DBDLP433	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment/character and amenity, resulting in the loss of valuable countryside, hedgerows and wildlife habitats.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.

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								Dispute the need for this many homes. The Government figure is much lower. Development will put a strain on the town's already overstretched roads and services (including doctors and schools). The additional traffic will cause congestion and pollution. Object to the loss of Springfield Park. Development will ruin established rights of way. Concerned that development will result in flooding. Priority should be given to the development of brownfield land. Object to the loss of green spaces. This will have an impact on resident's health and wellbeing.		
mrs carol mcmain				DBDLP 434	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. There are not the jobs needed to support this scale of development. Need good transport links to London and the rest of the world to attract new business. Development of this site will result in the loss of agricultural land and wildlife habitats.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								The additional traffic will cause congestion and increased noise and air pollution. Priority should be given to the development of brownfield land.		
Mrs Karen Gannon				DBDLP439	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment/character and amenity, resulting in the loss of valuable countryside, hedgerows and wildlife habitats. Dispute the need for this many homes. The Government figure is much lower. Dispute the figure of creating 7000 jobs. Development will put a strain on the town's already overstretched roads and services (including doctors and schools). The additional traffic will cause congestion and pollution. Object to the loss of Springfield Park. Development will ruin established rights of way. Concerned that development will result in flooding. Priority should be given to the development of brownfield land. Object to the loss of green spaces. This will have an impact on resident's health and wellbeing.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.

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Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP368	Policy H 10	Skerningham Strategic Allocation	Object	Objection to Skerningham strategic allocation. Concerns raised: • Is a development outside the urban area. • Has poor access and the existing road network is at capacity. This development provides no new infrastructure to relieve this. • The plan includes few brownfield sites. Skerningham is entirely greenfield. • Skerningham is considered to be an environmentally sensitive area constrained by the road and rail network. • Only a small part of the Skerningham strategic allocation would be developed in the plan period. Even with a Masterplan there is a significant risk the site will only be partially developed as circumstances change over the plan period and beyond. This will result in a poor outcome for the locality. Structured smaller scale development would seem far more appropriate.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes. Transport modelling work has been undertaken to test highway mitigation schemes to ensure developments proposed in the Local Plan do not have an unacceptable impact on local and strategic highway network. Policy H 10 also sets out infrastructure requirements for the site including principle access points and safeguarding corridors sufficient to provide road links through the site. The site has been allocated as a whole to ensure that it is planned as a single cohesive sustainable development, fully supported by necessary infrastructure.	Please see officer response on the Skerningham Strategic Allocation.

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Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP371	Policy H10	Skerningham Strategic Allocation	Object	There are significant infrastructure requirements needed but no indication of when they will be delivered. Vehicles will turn out onto the A1150 and A167 which are already running at near capacity. The inner Northern Link Road route would not serve the Skerningham site and would conflict with the Green Infrastructure policy. Object to changes to the community woodland and hedgerows (particularly as a result of the golf club relocation). This will affect wildlife and any replacement will be vastly inferior. Doubt that the amenity of existing residential properties can be protected. It represents development in the countryside and considerable expansion of the development limits of the town. There is no justification for the relocation of the golf club. The proposals is at odds with the Green Infrastructure Strategy.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
MRS ROSAMUND SOWERBY				DBDLP567	Policy H10	Skerningham Strategic Allocation	Object	We do need more homes in Darlington but this can be done in a way that preserves our Green Belt. The plans for the north east of Darlington causes urban sprawl.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.

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								Dispute the need for this many homes. The Government figure is much lower. Priority should be given to the development of brownfield land. Development of this site will have an adverse impact on the local environment and heritage sites. Object to the potential changes to Public Rights of Way (including Green lane) and Springfield Park. These are used for recreation by residents and will have an impact on health and wellbeing. There is no justification for the relocation of the golf club. Development will put a strain on the town's already overstretched roads and services. The additional traffic will cause congestion and air pollution.	on brownfield sites, urban sprawl and empty homes. Darlington does not have any designated green belt. This is a formal designation typically found in larger urban areas to prevent settlements merging.	
Mrs S Fenwick				DBDLP 456	Policy H 10	Skerningham Strategic Allocation	Object	Strong object to the Skerningham allocation. Development will put a strain on the town's already overstretched roads and services. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. Object to the proposed changes to Springfield Park.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.

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Mrs Helen Downes				DBDLP474	Policy H10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched local roads. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. The area is used for recreation by residents. Development will bring noise, air and light pollution. Object to the proposed changes to Springfield Park.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.
Mrs Helen Downes				DBDLP475	Policy H10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched roads. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. The area is used for recreation by residents. Development will bring noise, air and light pollution. Object to the proposed changes to Springfield Park.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Leanne Carroll				DBDLP488	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. This will have an impact on resident's health and wellbeing.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								The area is used for recreation by residents. Object to the relocation of the golf club will impact on Skerningham Community Woodland. There is no justification for the relocation of the golf club. Object to the proposed changes to Springfield Park.		
Mrs Lisa Bramfitt				DBDLP 551	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. Development of this site will destroy the local environment and approach to Darlington. Unchecked council-led development can lead to soulless, uninviting sprawls, bereft of character, devoid of social inclusion and lacking in the environmental elements conducive to happy and healthy lives. Priority should be given to the development of brownfield land.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Paul Littleton				DBDLP 507	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the character of the area and the local environment. Development will put a strain on the town's already overstretched roads. Object to the proposed changes to Springfield Park. This will have an	Please see officer response on the Skerningham Strategic Allocation..	Please see officer response on the Skerningham Strategic Allocation.

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								impact on resident's health and wellbeing. There is no justification for the relocation of the golf club.		
Pauline Burton				DBDLP 514	Policy H 10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched services. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. The area is used for recreation by residents. Development will cause traffic congestion and air pollution. Open green spaces should be protected.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mrs C Everington				DBDLP 565	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside/agricultural land and wildlife habitats. The area is used for recreation by residents. This will have an impact on resident's health and wellbeing. This will impact on the Brightwater project. The areas is rich in history, the Durham Ox or Ketton Ox was bred here. Development will compromise the character and setting of the listed building on the site. The Council has overlooked	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								the deserted medieval village on the site. Development will put a strain on the town's already overstretched roads and services.		
Stephen Gibby				DBDLP 486	Policy H 10	Skerningham Strategic Allocation	Object	The housing allocation is disproportionate and would unbalance the town. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. The area is used for recreation by local residents. Losing parkland and local footpaths is likely to have a negative impact on social integration, mental health, fitness and wellbeing. The additional traffic will cause congestion and pollution affecting air quality and quality of life. Concerned that development will result in flooding. Object to the loss of public Rights of Way.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 657	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. Allocating a site, 60% of which is planned to be developed after the	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation. The numbering of policy criteria in the Local Plan has been reviewed prior to publication.

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								end of the plan period, is not appropriate in planning terms. There is no local employment provision for such a large development making it a commuter estate. This is not socially, environmentally or economically sustainable. Bullet points can be hard to refer to in a policy and it is suggested some form of sub numbering/letter is used.	Paragraph 72 of the NPPF is clear that larger scale development can often be the best way to secure the delivery of large numbers of new homes. The Local Plan seeks to allocate a large urban extension site at Skerningham to deliver housing to meet the needs of the Borough over the long term and to ensure that the area is properly planned in order to create a sustainable and cohesive new community with all of the infrastructure and facilities required to support it. The Council's emerging Local Plan provides for the creation of 7,000 new jobs within the plan period. This is in line with previously achieved job creation levels and is therefore deliverable to 2036. The emerging Local Plan identifies 175 hectares (net available) employment land on existing and proposed employment sites, most of which is situated on the east and north west sides of Darlington town. The Skerningham strategic allocation site also has the potential to include an element of employment land close to the A66 around Great Burdon subject to appropriate assessment and evidence of future need. The need to allocate this land specifically for employment purposes will be considered when the plan is next reviewed.	
Judith Murray				DBDLP 527	Policy H 10	Skerningham Strategic Allocation	Object	It represents development in the countryside and a considerable expansion of the development limit contrary to the NPPF. It has not been sufficiently demonstrated that development boundaries need to be extended. Development will adversely affect the character, appearance and	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								nature of the Skerningham Valley/countryside and destroy wildlife habitats. Development will being noise and air pollution. Object to the loss of recreational facilities and permissive paths including Springfield Park (which is an Asset of Community Value). It will result in the loss of agricultural land. Planned development will have a negative impact on local infrastructure. Development will put a strain on the town's already overstretched roads.		
Mr John Barker				DBDLP666	Policy H 10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched roads and services (including doctors surgery and schools). A new link road will do little to alleviate congestion within Darlington. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. This will have an impact on quality of life.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes. Paragraph 72 of the NPPF is clear that larger scale development can often be the best way to secure the delivery of large numbers of new homes. The Local Plan seeks to allocate a large urban extension site at Skerningham to deliver housing to meet the needs of the Borough over the long term and to ensure that the area is properly planned in order to create a sustainable and cohesive new community with all of the infrastructure and facilities required to support it. Policy H 10 recognises	Please see officer response on the Skerningham Strategic Allocation.

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								Dispute the need for this many homes. The Government figure is much lower. A more conservative approach should be taken to development in this area. Priority should be given to the development of brownfield land. Object to the proposed changes to Springfield Park.	the need to retain, conserve and integrate where appropriate elements of historic and natural interest, along with green spaces on the site, in line with the provisions of other policies in the Local Plan and national policy.	
Mr Peter Evans				DBDLP569	Policy H 10	Skerningham Strategic Allocation	Object	Point 1 attributed to Policy H 1: Housing Requirement. Development will put a strain on the town's already overstretched local roads (i.e. A167, A1150, Barmpton Lane and Whinbush Way). The roads have reached saturation point. A new access point at Springfield Park is totally unrealistic. The ingress/egress from the Skerningham site is badly let down by the existing road infrastructure. Object to the loss of green space and open countryside. Dispute the need for this many homes. The Government figure is much lower. A third independent projection should be sought. Priority should be given to the development of brownfield land.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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Mr Andrew Burton				DBDLP584	Policy H10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched services. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside and wildlife habitats. The area is used for recreation by residents. Development will cause traffic congestion and air pollution. Open green spaces should be protected.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Franz Egarter				DBDLP626	Policy H10	Skerningham Strategic Allocation	Object	Priority should be given to the development of brownfield land. The additional traffic will cause congestion, pollution and affect road safety, especially on Whinfield Road and Sparrowhall Drive. Development will put a strain on the town's already overstretched services (including schools and doctors surgeries). There is no justification for the relocation of the golf club. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and agricultural land. The area is used for recreation by residents.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								Dispute the need for this many homes.		
Margaret Egarter				DBDLP628	Policy H10	Skerningham Strategic Allocation	Object	Priority should be given to the development of brownfield land. The additional traffic will cause congestion, pollution and affect road safety, especially on Whinfield Road and Sparrowhall Drive. Development will put a strain on the town's already overstretched services (including schools and doctors surgeries). There is no justification for the relocation of the golf club. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and agricultural land. The area is used for recreation by residents. Dispute the need for this many homes.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Miss Carole Hardy				DBDLP674	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. There are many new homes in Darlington that are still empty. Priority should be given to the development of brownfield land. Development will put a strain on the town's already overstretched services (including doctors,	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes. Draft Policy DC 1: Sustainable Design Principles - requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption, and how buildings have been made energy	Please see officer response on the Skerningham Strategic Allocation.

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								schools and other community areas). Incorporate solar panel technology into developments. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside/agricultural land and wildlife habitats. This will have an impact on resident's health and wellbeing. The area is used for recreation by residents. Allowing a road across Springfield Park will spoil it. The relocation of the golf club will impact on Skerningham Community Woodland and wildlife habitats. There is no justification for this. Concerned that development will result in flooding of properties and the River Skerne. Main roads are already congested. The additional traffic will cause further congestion, pollution and affect road safety. Development will put a strain on the town's already overstretched services (including schools, doctors and other local services).	efficient thereby reducing carbon emissions. The Council will be supportive of development proposals that incorporate solar panel technology (and other renewable energy generating technology) where appropriate to the design and location of development.	

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Mrs Holmes				DBDLP711	Policy H10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched roads. Barmpton Lane has become a rat run. The additional traffic will cause further congestion. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside. Reconsider the plan and find alternative sites.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr McMain				DBDLP716	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. Priority should be given to the development of brownfield land. Dispute the need for this many homes. The Government figure is much lower. Dispute the figure of creating 7000 jobs.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Mr Peter Eckels				DBDLP722	Policy H10	Skerningham Strategic Allocation	Object	Is the Local Plan still current given the speculation that the town centre will need to shrink, providing significant opportunities to develop housing. The additional traffic will cause congestion, air pollution and noise. Existing local infrastructure will not cope.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								Object to the proposed changes to Springfield Park. Object to the loss of countryside which provides a habitat to wildlife. In stretching the boundaries of the town it will reduce the opportunities for recreation for many residents.		
Mr Chris Bowey				DBDLP 745	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the historic character of the area and the local environment, resulting in the loss of valuable countryside and wildlife habitats. Development will put a strain on the town's already overstretched roads. The additional traffic will cause congestion, air pollution, noise and affect road safety. There is no justification for the relocation of the golf club. New tree planting to replace the loss of Community Woodland would take decades to establish. Priority should be given to the development of brownfield land. If greenfield land is required, sites should be much smaller in size and more spread out to limit the impacts.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Mr Neil Westwick	Senior Director Skerningh	Mr Neil	Skerningham Estates Ltd	DBDLP 849	Policy H 10	Skerningham Strategic Allocation	Support	Skerningham will make a significant contribution to housing and economic growth in Darlington. Provides the	Support noted. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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	am Estates Ltd	Westwick						opportunity to create a vibrant, green and sustainable community. The development will be set within an extensive network of green and blue infrastructure - over one third of the area. The proposal will incorporate infrastructure and services provided alongside development. The site will also make provision for the relocation of Darlington Golf Club, retain Springfield Park and enhance the significance of listed buildings within the site. Welcome the adoption of the Healthy New Town approach to site layout and design. It will deliver significant economic benefits including close to 750 jobs in the construction sector and 3,400 jobs in the local economy.		
Mr Alan Hutchinson				DBDLP 753	Policy H 10	Skerningham Strategic Allocation	Object	Object to the increase in the development limit. Development of this site will have an adverse impact on the character of the area and the local environment, resulting in the loss of valuable countryside and wildlife habitats. Development will result in a considerable loss of amenity for existing residents. Object to the relocation of Darlington Golf Club and the loss of community woodland and	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								public access. This will have an impact on resident's health and wellbeing. Skerningham Countryside Park should be designated as a Local Green Space. The plan proposals to produce a net increase in community woodland is unrealistic and unachievable. Development will put a strain on the town's already overstretched roads. The additional traffic will cause congestion, and pollution from noise vehicles and light. Object to the proposed changes to Springfield Park (which is an Asset of Community Value) and should be designated as a Local Green Space.		
Mrs Clare E Friskney				DBDLP 758	Policy H 10	Skerningham Strategic Allocation	Object	Object to the loss of this area of natural beauty and to children's play areas. Development will put a strain on the town's already overstretched roads, services and facilities. Development will increase traffic congestion. Priority should be given to the development of brownfield land. There is no justification for the relocation of the golf club.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Andrew Keir				DBDLP 759	Policy H 10	Skerningham Strategic Allocation	Object	There has been insufficient public consultation regarding the proposals for Skerningham. Believe that public	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								comments will not affect the outcome. Development of this site will have an adverse impact on the character of the area and the local environment, resulting in the loss of valuable countryside, green space and wildlife habitats. This will have an impact on resident's health and wellbeing. Whinfield road will not be able to accommodate the additional traffic. The additional traffic will cause congestion, noise and general negative environmental effects. The increased traffic and equipment will adversely affect air quality. Development will put a strain on the town's already overstretched services (including shops, schools, dentists and doctor surgeries). Support the comments made in the Whinfield Residents Association objection.		
Dawn Makepeace				DBDLP760	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside, wildlife habitats and historical assets (including the location of a Roman amphitheatre). This will have an impact on resident's health and wellbeing.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes. Having checked with Durham County Council's Archaeology Section, there is no record of a Roman amphitheatre on the Skerningham site evident on the	Please see officer response on the Skerningham Strategic Allocation.

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								The area is used for recreation by residents. Dispute the need for this many homes when there are other areas of Darlington that could be modernised and put back on the map as desirable housing. Object to the proposed changes to Springfield Park.	Historic Environment Record for this area.	
Ms Helen McIntyre				DBDLP 709	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of a beautiful historic area and wildlife habitats. In 8 years the woodland has matured and provides a home to wildlife, some of which is endangered due to overdevelopment of the countryside. Development will put a strain on the town's already overstretched roads and services (including DMH, GP surgeries, Police, Fire and Ambulance etc.). The plan contains a lot of contradiction.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr John Atkinson				DBDLP 618	Policy H 10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched roads and services. The additional traffic will cause congestion, air pollution, noise and affect road safety. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside, open	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method. The 45% refers to land outside of the developed area of the site and covers the large green corridor along the southern side of the River Skerne which will incorporate areas of accessible green space, managed	Please see officer response on the Skerningham Strategic Allocation.

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								space and wildlife habitats. This will have an impact on resident's health and wellbeing. Object to the proposed changes to Springfield Park. Dispute the need for this many homes. The Government figure is much lower. There is no justification for the relocation of the golf club. If the 45% green space includes the golf club then this is not available to existing residents unless they become members. I question whether there is a breech of process in allowing Bellway to apply for permission to build 142 homes on Elm Tree farm at this late stage of the consultation process for the local plan when it forms part of the Skerningham allocation site.	agricultural land and the relocated Darlington Golf Club. Further green space will be provided within the remainder of the site, creating an extensive network of green infrastructure connecting residential areas and community facilities, delivered in line with Policy ENV 4. This position will be clarified in the supporting text to the policy. Planning applications can be submitted at any point in time and must be considered against the adopted policies at the time the application is determined. The Council cannot prevent a landowner or developer submitting a planning application and, once submitted, has a duty to decide the application within a set timescale or face an appeal from the applicant against non-determination. The policies contained in the Draft Local Plan can only be given limited weight at this stage due to their position in the plan preparation process.	
Miss Joanne Evans				DBDLP641	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. Suggest a third independent projection to provide more certainty. Development will put a strain on the town's already overstretched roads. Local roads (including Barmpton Lane and Whinbush Lane) will not cope with the additional traffic. An access across Springfield Park is totally unrealistic. The simple addition of mini roundabouts or traffic lights	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method. The housing projection will be tested thoroughly when the Local Plan is examined by an independent Inspector appointed by the Government during a public hearing. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								does not constitute an improvement. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside, open space, footpaths/bridleways and wildlife habitats. This will have an impact on resident's health and wellbeing. Priority should be given to the development of brownfield land and use of empty properties (such as the Rolling Mills site in Whessoe Road). I can see the merits of some greenfield sites such as Great Burdon and West Park as these already have suitable existing road structures and are adjacent to existing urban developments.		
Mrs Claire Wayper				DBDLP872	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. This will have an impact on resident's health and wellbeing. The area is used for recreation by residents. Object to the proposed changes to Springfield Park. Allowing a road across Springfield Park would mean that it was no longer safe for children.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.

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								The resulting pollution would be detrimental to health. Priority should be given to the development of brownfield land (such as McMullen Road, West Park and Albert Hill).		
Mr Chris Jackson				DBDLP 811	Policy H 10	Skerningham Strategic Allocation	Object	Agree with other objections on the Skerningham development. The roads cannot cope. The additional traffic will cause congestion, air pollution and affect road safety. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. Dispute the need for this many homes. The Government figure is much lower.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.
Miss Diane Nicholson				DBDLP 825	Policy H 10	Skerningham Strategic Allocation	Object	Priority should be given to the development of brownfield land. Development of this site will have an adverse impact on the local environment. There is no justification for the relocation of the golf club to the community woodlands, leading to the further loss of wildlife. Development will put a strain on the town's already overstretched roads (Whinfield Road, Salters Lane North). It would be difficult to turn right out of Oak Wood	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								Drive unless traffic lights were installed. Object to the proposed changes to Springfield Park. If the proposed development on land to the north of Sparrow Hall Drive is built how would it affect the plans for this access road?		
Gill Naisby				DBDLP818	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. This will have an impact on resident's health and wellbeing. There is a difference between green spaces and countryside. Development will put a strain on the town's already overstretched roads. The additional traffic will cause congestion and air pollution.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Diane Dobson				DBDLP879	Policy H10	Skerningham Strategic Allocation	Object	Object to the proposed changes to Springfield Park and walking routes. Where will teenagers go and what will be left for them to do with their time. Housing developments currently in the area share the space sympathetically will local wildlife and green spaces. The proposed development is so large it will remove virtually all wildlife and safe green space. Development of this site will have an adverse impact on the local environment, resulting in the loss	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								of valuable countryside and wildlife habitats. Priority should be given to the development of brownfield land.		
Mr Ian Downes				DBDLP824	Policy H10	Skerningham Strategic Allocation	Object	The local road infrastructure cannot handle the existing traffic volumes, adding extra traffic will exacerbate problems. Priority should be given to the development of brownfield land. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. Development will put a strain on the town's already overstretched services (including doctors, dentists, hospital services and schools). Object to the proposed changes to Springfield Park. Allowing a road across Springfield Park will introduce a significant hazard.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Ms Janet Raper				DBDLP940	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside and wildlife habitats. This will have an impact on resident's health and wellbeing. There is very little in the town centre now. Look at converting empty premises in the centre for residential use. There are plenty of	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								empty houses and other buildings available.		
Mr Keith Podart				DBDLP941	Policy H10	Skerningham Strategic Allocation	Object	We should be protecting our green space, priority should be given to the development of brownfield land and use of empty properties. Even more properties are available in the town centre with the loss of large retailers. Development will put a strain on the town's already overstretched roads and services (including primary schools and nurseries). The additional traffic will cause congestion and pollution. Object to the proposed changes to Springfield Park. Object to the loss of countryside walks, woodland and wildlife. The relocation of the golf club will destroy the community woodland at Skerningham Countryside Park. There is no justification for the relocation of the golf club. Dispute the need for this many homes. The Government figure is much lower.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Ms Laura Gardner				DBDLP958	Policy H10	Skerningham Strategic Allocation	Object	The additional traffic along Sparrow Hall Drive and Whinfield Road will cause congestion, pollution, noise and affect road safety. Development of this site will have an adverse impact on the local environment and landscape,	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								resulting in the loss of local wildlife and recreational opportunities. This will have an impact on resident's health and wellbeing. Development will put a strain on the town's already overstretched roads and local services (including doctors and schools). Development will devalue property in the area. Dispute the need for this many homes. The town centre is diminishing. Priority should be given to the development of brownfield land and use of empty properties.		
Mrs Liz Knight				DBDLP961	Policy H10	Skerningham Strategic Allocation	Object	Request that the Skerningham allocation is removed from the plan and that the need for its inclusion is reviewed at the time of production of the next Local Plan in 2036. It represents development in the countryside and a considerable expansion of the development limit. Dispute the need for this many homes. Development of this site will have an adverse impact on the local environment and result in the loss of valuable	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.

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								countryside/agricultural land and wildlife habitats. Object to the loss of public rights of way/permissive paths (including changes to Green lane) and community woodland that are extensively used by residents for recreation. When such routes are provides alongside development they are inferior. Development will being noise, air and light pollution. The relocation of the golf club will impact on Skerningham Community Woodland. The relocation of Darlington Golf Club makes no sense. New tree planting to replace any loss of Community Woodland would take 20-30 years to establish. Plan suggests that any new woodland would be separated by some distance from the Skerningham Countryside Park itself. Development will put a strain on town's already overstretched roads and services. Even is a link road goes ahead the additional traffic will cause congestion, pollution, noise and affect road safety. Traffic removed from the A1150 will simply be replaced by that from the Skerningham development. There has been insufficient public consultation regarding the		

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								proposals for Skerningham. There has been no meaningful consultation with the local community on the proposals prior to the Draft Local Plan. Object to the proposed changes to Springfield Park (which is an Asset of Community Value). Allowing a road across Springfield Park will destroy it.		
Mr Knight				DBDLP966	Policy H10	Skerningham Strategic Allocation	Object	Request that the Skerningham allocation is removed from the plan and that the need for its inclusion is reviewed at the time of production of the next Local Plan in 2036. It represents development in the countryside and a considerable expansion of the development limit. Dispute the need for this many homes. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside/agricultural land and wildlife habitats. Object to the loss of public rights of way/permissive paths (including changes to Green lane) and community woodland that are extensively used by residents for recreation. When such routes are provides alongside development they are inferior.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	Please see officer response on the Skerningham Strategic Allocation.

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								Development will being noise, air and light pollution. The relocation of the golf club will impact on Skerningham Community Woodland. The relocation of Darlington Golf Club makes no sense. New tree planting to replace any loss of Community Woodland would take 20-30 years to establish. Plan suggests that any new woodland would be seperated by some distance from the Skerningham Countryside Park itself. Development will put a strain on town's already overstretched roads and services. Even is a link road goes ahead the additional traffic will cause congestion, pollution, noise and affect road safety. Traffic removed from the A1150 will simply be replaced by that from the Skerningham development. There has been insufficient public consultation regarding the proposals for Skerningham. There has been no meaningful consultation with the local community on the proposals prior to the Draft Local Plan. Object to the proposed changes to Springfield Park (which is an Asset of Community Value). Allowing a road across Springfield Park will destroy it.		

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Kim Bainbridge				DBDLP1039	Policy H 10	Skerningham Strategic Allocation	Object	Residents knew nothing of this proposal until land speculators Theakstons undertook falsely named "consultation" where no feedback was encouraged by the questionnaires given. However it would appear that DBC have been in consultation with Theakstons and have adopted their plan entirely. The Skerningham Masterplan is at odds with the Council's Green Infrastructure Strategy and standards. It fails to mention the medieval village or graves located among the black poplars. There is no justification for the relocation of the golf club. Surely no permission could be given to relocate a golf club from the edge of town to a designated wildlife area which is less accessible and would destroy woodland planted with public money as part of the Tees Forest. Any development on this area, including the golf club will be severely detrimental to the wildlife and contribute to the national devastation of woodland and farmland bird numbers. There is poor access to the site and more housing will lead to untenable traffic congestion on the A1150 and Winbush Way. Surely no development can take place on Skerningham as if Route	Please see officer response on the Skerningham Strategic Allocation. The Skerningham Community Woodland is not a designated wildlife area. Draft Policy H 10 specifies that there must be a net gain in the area of community woodland on the site. There is currently no guarantee that the plans for a Northern Link Road will be delivered and, as such, the plan therefore has to be prepared under the assumption that it will not be forthcoming and that the growth proposed in the plan does not rely on its delivery. However, it would also be short-sighted for the emerging plan to compromise the future delivery of the Northern Link Road should the business case be ratified and funding obtained for its delivery. Therefore, the proposed layout of development on the Skerningham Strategic Allocation, as indicated on the Masterplan Framework plans in the Draft Local Plan (Figures 6.1 and 6.2), would enable the delivery of either the inner or outer route options without having a significant impact on the delivery of the wider Skerningham site, and indeed having a number of potential benefits. However, it should be noted that only the outer link road route is now being explored and this has been reflected in changes to the policy wording and supporting text of the Proposed Submission Local Plan document.	Please see officer response on the Skerningham Strategic Allocation.

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								B was chosen it would render the masterplan unworkable.		
Mr Roger Fitzpatrick-Odahamier				DBDLP994	Policy H10	Skerningham Strategic Allocation	Object	It represents development in the countryside and a considerable expansion of the development limit contrary to the NPPF. It has not been sufficiently demonstrated that development boundaries need to be extended. Development will adversely affect the character, appearance and nature of the Skerningham Valley and Whinfield area and destroy wildlife habitats. Development will bring noise and air pollution. Object to the loss of recreational facilities such as permissive paths and open spaces and is therefore contrary to Policy DC 2. It will result in the loss of agricultural land. Planned development will have a negative impact on local infrastructure. The area is unsustainable as development will put a strain on the town's already overstretched roads. The development is isolated and will result in more cars on the roads increasing pollution. Object to the proposed changes to Springfield Park.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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Ms Emily Hrycan	Historic England			DBDLP1142	Policy H10	Skerningham Strategic Allocation	Object	The Plan and the supporting evidence base including the SA should be amended to ensure that it includes a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for development and to ensure that there are appropriate site specific mitigation measures which will minimise harm to the historic environment in line with the requirements of the NPPF and the 1990 Act. The last line of the policy incorrectly repeats the NPPF (it is not protect and conserve). It should also ensure that it is correct in referencing assets that are within and adjacent to the boundary.	Please see officer response on the Skerningham Strategic Allocation. The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified as part of this work have been included within the policy and/or supporting text.	Please see officer response on the Skerningham Strategic Allocation. Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the policy and/or supporting text.
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP1170	Policy H10	Skerningham Strategic Allocation	Object	Supportive of this urban extension however greater emphasis needs to be placed on the need to fully consider the viability of forthcoming development. The Elm Tree Farm site (reference number 392) should not be shown as part of the wider Skerningham strategic allocation site. Request that the site is omitted from the strategic allocation site to avoid confusion and potential risk that housing on an identified and readily deliverable allocation might become unnecessarily prejudiced or delayed. It is noted that a proposed principle access point would run in close proximity to site 392 Elm Tree Farm. Bellway consider that this vehicular access point could	The Council has prepared a Whole Plan Viability Assessment in support of the Local Plan that has been used to inform its decisions on the viability of allocation sites, taking into account, and testing affordable housing standards and other proposed costs to development resulting from proposed local planning policies, as required by the NPPF and NPPG. The Elm Tree Farm site was included within the boundary of the Skerningham Strategic Allocation (but not double counted in terms of housing figures) because it forms a logical extension of the masterplan framework area. However, in recognition that this site forms a separate allocation changes have been made to the Policies Map and the Skerningham Masterplan Framework plan, Figure 6.1, to reflect this position.	The Skerningham Strategic Allocation boundary has been amended to remove the Elm Tree Farm site (site ref 392). The Skerningham Masterplan Framework, Figure 6.1, has been changed so that the legend refers to the 'Masterplan Framework Boundary' as opposed to the 'Site Boundary', and the framework plan has been amended to more closely reflect the layout of development in the planning application for the Elm Tree Farm site. The following point has been added to the housing allocation statement for Site 392 - Elm Tree Farm in Appendix B: 'f. Development should be in broad alignment with the Skerningham Masterplan Framework (Figure 6.1) and the development principles contained in Policy H 10: Skerningham Strategic Allocation.

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								be successfully accommodated alongside the development of site 392 and therefore so not object or raise concerns regarding its proposed alignment.		The Greater Faverdale Masterplan Framework, Figure 6.3, has been changed so that the legend to refers to the 'Masterplan Framework Boundary' as opposed to the 'Site Boundary'
Gillian McKittrick				DBDLP 1192	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. With industries moving out of the north east who is going to buy them - or do you have plans for them all to be social housing? Priority should be given to the development of brownfield land and use of empty properties. Development will put a strain on the town's already overstretched roads and services. The additional traffic will cause congestion, pollution and affect road safety. Object to the proposed closing of Springfield Park. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside, rights of way and wildlife habitats. The area is used for recreation by residents. This will have an impact on resident's health and wellbeing.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
David McKittrick				DBDLP 1194	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. With industries moving out of the north east who is going to buy them - or do you	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and	Please see officer response on the Skerningham Strategic Allocation.

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								have plans for them all to be social housing? Priority should be given to the development of brownfield land and use of empty properties. Development will put a strain on the town's already overstretched roads and services. The additional traffic will cause congestion, pollution and affect road safety. Object to the proposed closing of Springfield Park. Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside, rights of way and wildlife habitats. The area is used for recreation by residents. This will have an impact on resident's health and wellbeing.	on brownfield sites, urban sprawl and empty homes.	
Ms Julie Nixon				DBDLP 1370	Policy H 10	Skerningham Strategic Allocation	Object	Concerns raised: • Impact on the countryside and loss of nature/wildlife. • The area is used for walking and exercising. • Area of flood risk. • Impact on heritage assets and burial site. • Impact on woodland. • Traffic congestion in the area and impacts on highway safety,	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								pollution and public health.		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP1376	Policy H10	Skerningham Strategic Allocation	Support	The strategic allocation can complement the delivery of either link road option but equally would not be compromised if the plans for the road were not progressed.	Support noted. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Marion Williams	Environment Agency			DBDLP1294	Policy H10	Skerningham Strategic Allocation	Neutral	There is the potential to create a significant country/urban park in the Skerne valley, restoring a more natural function to this section of modified river. Any development should contribute to such restoration and ensure that it does not compromise such a scheme through encroachment onto the floodplain.	Comment noted and agreed. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr Tim Ellis				DBDLP84	Policy H10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside/agricultural land. Allowing a road across Springfield Park will destroy it. Development will put a strain on town's already overstretched roads and services.	Please see officer response on the Skerningham Strategic Allocation.	See officer response paper on Skerningham comments.
Mr Simeon Hope				DBDLP249	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many houses. The additional traffic will cause congestion, pollution and road traffic accidents. Development of this site will have an adverse impact on the local environment and the relocation of	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	See officer response paper on Skerningham comments.

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								Darlington Golf Club is especially egregious. Suggestion of planting new woodland to replace that lost is risible. Development will interfere with the popular Springfield Park. There has been insufficient public consultation regarding the proposals for Skerningham. Believe that public comments will not affect the outcome.		
Alan Hutchinson	Whinfield Residents Association			DBDLP166	Policy H10	Skerningham Strategic Allocation	Object	It represents development in the countryside and a considerable expansion of the development limit. Dispute the need for this many homes. Development of this site will have an adverse impact on the local environment and result in the loss of valuable countryside/agricultural land and wildlife habitats. Object to the loss of public rights of way/permissive paths (including changes to Green lane) and community woodland that are extensively used by residents for recreation. When such routes are provides alongside development they are inferior. Development will being noise, air and light pollution.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method.	See officer response paper on Skerningham comments.

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								The relocation of the golf club will impact on Skerningham Community Woodland. The relocation of Darlington Golf Club makes no sense. New tree planting to replace any loss of Community Woodland would take 20-30 years to establish. Plan suggests that any new woodland would be seperated by some distance from the Skerningham Countryside Park itself. Development will put a strain on town's already overstretched roads and services. Even if a link road goes ahead the additional traffic will cause congestion, pollution, noise and affect road safety. Traffic removed from the A1150 will simply be replaced by that from the Skerningham development. There has been insufficient public consultation regarding the proposals for Skerningham. There has been no meaningful consultation with the local community on the proposals prior to the Draft Local Plan. Object to the proposed changes to Springfield Park (which is an Asset of Community Value). Allowing a road across Springfield Park will destroy it.		
Dave McGuire	Sport England (North East)			DBDLP 103	Policy H 10	Skerningham Strategic Allocation	Neutral	Clarification required on how the proposals will affect Springfield Park and further detail needed on	Please see officer response on the Skerningham Strategic Allocation.	See officer response paper on Skerningham comments.

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								the relocation of Darlington Golf Club.	The relocation of Darlington Golf Club will result in a facility of at least equivalent in terms of quantity and quality in a suitable location to the satisfaction of national policy. Further details on the clubs relocation will be provided as the proposals develop. Also please see officer response on the Skerningham Strategic Allocation.	
Mrs Donna Greenhow				DBDLP185	Policy H10	Skerningham Strategic Allocation	Object	The additional traffic will cause congestion, pollution and noise. The local roads are already overstretched. Use weight restrictions to remove HGV traffic from the A1150, they can then can use either the A66 and A689 to access Teesport. Development of this site, and the relocation of the golf course, will have an adverse impact on the local environment and result in the loss of valuable countryside, woodland and wildlife habitats. Object to the proposed changes to Springfield Park. Children and adults need safe places for their well-being and mental health. Object to any development along the River Skerne corridor.	Please see officer response on the Skerningham Strategic Allocation. The lack of North bound slip roads at junction 57 of the A1(M) means it is not a viable option to stop HGV's from using the A1150, and until a new alternative is provided, the A1150 will continue to be the main route used for traffic moving between South Durham and Teesside.	See officer response paper on Skerningham comments.
Andrea Toulson				DBDLP596	Policy H10	Skerningham Strategic Allocation	Object	Development will put a strain on the town's already overstretched roads and services. Object to the proposed changes to Springfield Park and the surrounding countryside. This will	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	See officer response paper on Skerningham comments.

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								have an impact on resident's health and wellbeing. Priority should be given to the development of brownfield land.		
Mr Simon Jones				DBDLP946	Policy H10	Skerningham Strategic Allocation	Object	The Skerningham proposals has been hidden until very recently, a development of this size requires to be its own entity. Darlington has many areas in need of regeneration. Dispute the need for this many homes. Development will put a strain on the town's already overstretched roads and services (including schools and doctors surgery). Object to the proposed changes to Springfield Park they will destroy the area forever. The development would affect our amenity.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	See officer response paper on Skerningham comments.
Mr Sean Bowman				DBDLP81	Policy H10	Skerningham Strategic Allocation	Object	Object to the Skerningham site on a number of grounds including increased traffic, loss of countryside, wildlife, loss of park areas for children, removal of public right of way walks in open fields. Concerned that development will result in flooding of the river.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Major Frederick				DBDLP91	6.10.2	Paragraph	Object	Dispute the need for this many homes. The Government figure is much lower. DBC are the only local authority in the area to have	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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Greenhow MBE								greatly over estimated housing requirements. Development of this site will have an adverse impact on the character of the area and the local environment, resulting in the loss of valuable countryside and wildlife habitats. The area is used for recreation by residents. MP Jenny Chapman did a walk around and stated that this area should not be developed, but left for the protection of its wildlife and residents to enjoy. Object to the loss of permissive paths and community woodland that are extensively used by residents for recreation. The area also includes a medieval village and the ancient and historic Green lane. Development will bring noise, air and light pollution. The local roads are already overstretched. Even if a link road goes ahead the additional traffic will cause congestion and pollution. Use weight restrictions to remove HGV traffic from the A1150, they can then can use either the A66 and A689 to access Teesport. Object to the relocation of the golf club which will result in the loss of publicly accessible community woodland. New tree planting to replace the loss of Community	Please see officer response on housing requirement and standard method. Paragraph 60 of the NPPF makes it clear that the standard method for calculating housing need is the minimum starting point for local authorities. Darlington Borough Council are not the only local authority in the area to be planning for growth above the level set out under the standard methodology, with all of the other Tees Valley local authorities also planning for growth above this level. The lack of North bound slip roads at junction 57 of the A1(M) means it is not a viable option to stop HGV's from using the A1150, and until a new alternative is provided, the A1150 will continue to be the main route used for traffic moving between South Durham and Teesside.	

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								Woodland would take decades to grow and mature. There has been insufficient public consultation regarding the proposals for Skerningham with residents. The consultation undertaken by the developer was not fit for purpose. DBC should have involved the public at a much earlier stage. Object to the inclusion of Springfield Park. Children and adults need safe places for their well-being and mental health.		
Stephen Dibby				DBDLP487	6.10.2	Paragraph	Object	Transitional and ultimate impact on infrastructure and services will be a challenge. Green land and park land is threatened - where do children, football teams play in future. Where will dogs be walked? How can you talk about retaining and enhancing hedgerows & trees - the plan eradicates them? How will you ensure that the introduction of new schools will not adversely impact existing schools?	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP374	Figure 6.1	Skerningham Masterplan Framework	Object	The plan lacks much detail and it is largely meaningless. There is a failure to show the East Coast railway line, a considerable hindrance to the development of the site and the River Skerne which forms an important part of	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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								the Indicative Strategic Green Infrastructure. The indicative location for the Golf Club would be on top of the two Listed properties and the Deserted Medieval Village of Skerningham and on top of Skerningham Countryside Park and Skerningham Community Woodland, all promoted by DBC in their Green Infrastructure Strategy.		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 1378	6.10.8	Paragraph	Neutral	Suggest that the south east corner of the site is indicated as safeguarded land for employment purposes, and reviewed as part of any future update to the Council's employment land evidence base.	Agreed. Paragraph 6.10.8 acknowledges that the south east corner of the site has potential for future employment provision and that the need to release this part of the site for employment use will be considered when the Local Plan is next reviewed, and as part of any future update/review of the Council's employment land evidence base. The supporting text has been amended to make it clear that there is the potential for between 15-30 hectares of employment land in this location.	Please see officer response on the Skerningham Strategic Allocation.
Mr David Clark				DBDLP 65	6.10.10	Paragraph	Object	Feel the only reason DBC want a link road in and are promoting this especially inner link road Route B to push Skerningham development on a much larger scale than local residents were expecting it started with Darlington golf course to be built on into the major potential up to 4,500 homes which will spoil and destroy this openspace greenbelt corridor or countryside, and cause much worse traffic congestion in the area, pollution and noise for already established urban developments in the area.	Please see officer response on the Skerningham Strategic Allocation. Darlington does not have any designated green belt. This is a formal designation typically found in larger urban areas to prevent settlements merging.	Please see officer response on the Skerningham Strategic Allocation.
Mr	Member	Mr	Member	DBDLP 405	6.10.10	Paragraph	Object	Plans for a Northern Link Road have not moved forward and are	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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Simon Bainbridge	Barmpton and Skerningham Preservation Group	Simon Bainbridge	Barmpton and Skerningham Preservation Group					an aspiration rather than a realistic proposal that can inform the development of the site. This major infrastructure project could render the whole masterplan void. Any crossing of the East Coast Mainline is a considerable issue there have had no satisfactory response on the progress of discussions with Network Rail.		
Mr [illegible] Minto				DBDLP 809	6.10.10	Paragraph	Object	A link road from the A1(M) south, just south of the Tees bridge will give access to the A66(M) without going through Skerningham area and again losing important green belt areas.	Please see officer response on the Skerningham Strategic Allocation. Junction 57 of the A1(M) is outside of the borough. However, this is an option that has been discussed previously with Highways England but they currently have no intention to pursue the project. The Council continue to engage with Highways England on strategic highways matters. Darlington does not have any designated green belt. This is a formal designation typically found in larger urban areas to prevent settlements merging.	Please see officer response on the Skerningham Strategic Allocation.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 406	6.10.11	Paragraph	Object	45% of the green infrastructure cannot possibly be retained: • the golf club is relocated; • agricultural land will be minimal and clash with residential uses; and • the River Skerne corridor cannot be preserved if Route B of the Northern Link Road goes ahead.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP1379	6.10.11	Paragraph	Neutral	Request a change to the paragraph to state that the site will retain 'around' rather than 'over' 45% accessible green infrastructure and managed agricultural land, so as not to be overly prescriptive.	Comment noted. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr David Clark				DBDLP66	6.10.13	Paragraph	Object	Object to any access road forming part of Springfield Park it will cause noise, disruption and pollution and cause more traffic congestion as the heavy traffic on the A1150.	Please see officer response on the Skerningham Strategic Allocation.	See officer response paper on Skerningham comments.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP407	6.10.13	Paragraph	Object	Object to the proposed changes to Springfield Park (which is an Asset of Community Value). Allowing a road across Springfield Park will destroy it. Extending the park to the north is inadequate and will be cut off by Green Lane. Putting a road across the park is unacceptable on safety and aesthetic grounds. Springfield Park should be removed from the plan.	Please see officer response on the Skerningham Strategic Allocation.	See officer response paper on Skerningham comments.
Mr David Clark				DBDLP67	6.10.14	Paragraph	Object	The site also contains Skerningham Medieval Village that is not mentioned for some reason on page 138 of the plan (Appendix C: Darlington's Heritage Assets).	Skerningham Medieval Village is not a Scheduled Monument and is therefore not included on the list on page 138 of the plan. The potential location of Skerningham Medieval Village is identified on Figure C.1 showing Areas of High Archaeological Potential across the Borough. Under draft Policy ENV 1 development proposals involving ground disturbance in this area must be accompanied by an archaeological evaluation report.	Please see officer response on the Skerningham Strategic Allocation.

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									Please see officer response on the Skerningham Strategic Allocation.	
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP408	6.10.14	Paragraph	Object	Development will compromise the character and setting of the two Listed Building on the site. There is a failure to recognise the Skerningham deserted medieval village. Northern Link Road Route B would destroy these historic assets.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mrs Laura Roberts	Northumbrian Water			DBDLP739	Policy H 11	Greater Faverdale - Strategic Site Allocation	Neutral	Support sites allocation. Site should be required to incorporate sustainable drainage systems.	Support noted and agree with suggested change to policy.	Include reference to the need for the site to incorporate sustainable drainage systems under criterion x. Add Bullet: • incorporates a sustainable drainage system.
Ms Emily Hrycan	Historic England			DBDLP1107	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	There needs to be some evaluation of the potential impact of development on the Grade II Listed building within the site and Stockton & Darlington Railway HAZ.	Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified have been included within the policy and/or supporting text.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the policy and/or supporting text.
Ms Emily Hrycan	Historic England			DBDLP1143	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	The Plan and the supporting evidence base including the SA should be amended to ensure that it includes a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for development and to ensure that there are appropriate site specific mitigation measures which will minimise harm to the historic	Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified have been included within the policy and/or supporting text.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the policy and/or supporting text. The final sentence of Policy H 11 has been amended to read: 'The site design and layout ~~will need to protect~~ must ~~protect and~~ conserve and enhance the ~~Scheduled Monument~~ Listed Building on the site, and its setting, and the historic Stockton & Darlington Railway in accordance with policy ENV 1 and ENV 2. ~~which~~

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								environment in line with the requirements of the NPPF and the 1990 Act. The last line of the policy incorrectly repeats the NPPF (it is not protect and conserve). It should also ensure that it is correct in referencing assets that are within and adjacent to the boundary - there is no scheduled monument in the site but a Grade II heritage asset.		~~incorporates the trackbed of the historic Stockton and Darlington Railway.~~'
Marion Williams	Environment Agency			DBDLP 1295	Policy H 11	Greater Faverdale - Strategic Site Allocation	Neutral	Site should be used as an opportunity to re-naturalise the watercourse with SUDS used as the main method of surface water drainage.	Comments noted	Criteria to be added to H 11 x. • incorporates sustainable drainage systems. The plan should also be read as a whole and consideration given to policies DC 4 and EN 7 which prioritise the incorporation of SUDS into development schemes and encourage the restoration of natural watercourses.
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1213	Policy E 1	Safeguarding Existing Employment Opportunities	Object	Suggestion of more flexibility of uses for employment generating uses beyond the traditional employment uses B1 B2 B8.	Table 7.2 specifies the suggested uses for each site in more detail. Other uses can be considered flexibly through the planning application process.	Text to be reworded as follows: The following existing employment areas, as shown on the Policies Map, are promoted and safeguarded for existing and ongoing economic investment. Within these areas, planning permission will be granted in line with the 'suggested uses' of each site setout below. Proposals for other employment uses not falling within the 'suggested uses' of specific sites will only be permitted where the Borough Council is satisfied that they will not have detrimental effect on the amenities of the occupiers of adjoining or nearby properties or prejudice the development of adjacent sites.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 670	7.1.12	Paragraph	Neutral	Which four sites have been identified through the Helaa as mixed use sites ?	There aonly three sites which have been identified for mixed use for the plan going forward Site 185 Greater Faverdale	Paragraph 7.1.12 to change "…**two** new sites have been identified through the…(HELAA)…".

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									Site 352 Barton Street Haughton Road Site 355 Lingfield Point The fourth initial mixed use site 361 DTVA Airport North has been re-assessed as an Employment Site only after excluding Site 16 and including Site 27 after the Tees Valley Mayor took over the running of the Airport and land from Peel holding which voided residential development.	Site 352 - Remains an employment site due to applications being granted for residential uses on other parts of the site.
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1106	Policy E 3	Darlington Farmers Auction Mart Relocation	Object	Widening the boundary of the allocation so that it reflects the previous outline consent (rather than the smaller reserved matters boundary). Ensure the mix of uses also reflect the previous outline consent (in addition to those uses listed in Policy E3 currently) so that the land can be brought forward in a flexible manner . Better define the uses within Policy E3 to create more certainty to our Client; and Consider the future potential for a mixed use sustainable development on our Client's wider landholdings in the form of a new settlement/Garden Village	Boundary of the site can be amended based on previous applications and architectural vision. Mix of uses considered accurately in policy E3 which outlines ancillary rural uses and related agricultural uses. Mixed use for residential settlement / garden village is ruled out at this location as it is not considered a sustainable location for residential use.	Change Boundary of site on Policy map.
Ms Emily Hrycan	Historic England			DBDLP 1149	Policy E 4	Economic Development in the Open Countryside	Object	Para 2 Suggestion in policy that where it is possible and appropriate, proposals for the re-use of a heritage asset will be approved. This policy does not provide the same level of	Comments noted and to be amended	1st sentence Para 2 should be amended to read:

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								protection and will not safeguard Darlington's heritage assets. What does Bullet B means in terms of make use of retained features? If a feature is deemed to be part of the significance of a heritage asset then, make use would not always be appropriate. As not all features can be actively used.		~~Where possible and appropriate~~ existing buildings ~~including designated or non-designated heritage assets~~ shall **be retained and** reused. Bullet b) to read Make use of retained features that contribute to local distinctiveness or historic interest **if appropriate;**
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 676	Policy TC 1	Darlington - Town Centre Boundary	Object	Town Centre Uses not defined Boundary of Town Centre wrongly defined (spelling mistake) a 167	Town Centre Uses defined in Para 8.1.5 Correct boundary description could be more precise	Minor changes for description of boundary The Town Centre boundary is shown in the policies map and includes **South of** St Augustines Way (A68), **South of** Northgate Roundabout and **South of** St Cuthberts Way (A167) to the north , ...
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 680	Policy TC 3	Additional Site for Town Centre Uses	Object	Site "Number" 271 not visible on any Policy map / TC 3 policy hatching includes the Town Centre boundary.	Site Number as in table and text not visible The Site is allocation for additional Retail uses for the Town Centre First Policy which also helps to implement the Town Centre First policy and allows the sequential test for retail development.	Delete Site Number from Table in Policy TC3 and notation on policies map to be changed to differentiate from Town Centre Fringe and boundary revised to exclude properties on Northgate.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 682	Policy TC 4	District and Local Centres	Object	Are other District and Local Centres missing (North road etc. Reference point "iii" mentions a set of criteria that uses must satisfy to be acceptable.	The approach of this new Local Plan sets to only retain and safeguard Centres in Cockerton and Mowden due to their characteristic and safeguarding purpose.	Reword Policy TC4 to: The boundaries of the District and Local Centres are identified on the Policies Map. • Cockerton (District Centre) • Mowden (Local Centre) Types of uses that will be acceptable within the boundaries include shops, financial services, restaurants and cafes, drinking establishments, hot food takeaways, and a range of community and leisure

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										facilities (included within classes A2-A5, D1 and D2 of the Use Classes Order) so long as they: a. Are physically integrated with the rest of the centre; and b. Will ensure the vitality and viability of the centre is maintained.
Charles Johnson	Conservative Group			DBDLP141	Policy TC6	Darlington - Town Centre Fringe	Object	Objection to undefined "High density" in TC6 Should be within NPPF 2018 guidelines of chapter 11 achieving appropriate densities for Town centres	Reference to 'high density' has been removed in a suggested rewording of this policy. Ultimately acceptable densities will be determined at application stage and will also be expected to reflect the requirements of the Council's Design of New Development SPD.	Reword of policy TC6 to: 'Development and regeneration of the Town Centre Fringe will be promoted throughout the plan period to deliver a range of mixed use development and environmental improvements. To support the delivery of the remaining priorities identified the Town Centre Fringe Masterplan; development in this area should: a) Manage flood risk along the whole of the river corridor that incorporates enhanced river habitat and green infrastructure within the River Skerne Strategic GI corridor; b) Conserve historic buildings in the area, with an emphasis on creating opportunities for the celebration of Darlington's Heritage; c) Provide an improvement of existing housing in the area; d) Provide improvements in connectivity for pedestrians, cyclists and public transport into and through the area to allow access to jobs, leisure and business opportunities. Removal of the Gas Holder on Valley Street North poses a significant constraint to development and it's removal and site remediation at the earliest opportunity will be supported.'

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Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 684	Policy TC 6	Darlington - Town Centre Fringe	Object	The old Town Centre Fringe Masterplan is not enough to kickstart regeneration - A new plan is needed to identify all possible opportunities for residential development to press government to release resources for brownfield development. Policy is imprecise and should include excluded options "Perhaps the phrase "Included options for intensified land use re-development:" would be better replaced with "Development permitted in the Town Centre Fringe are:"	The NPPF makes clear that we should only rely on sites that have a reasonable prospect of coming forward. This would not prevent an updated Town Centre Fringe Masterplan or Strategy from being developed.	Reword of policy TC6 to: 'Development and regeneration of the Town Centre Fringe will be promoted throughout the plan period to deliver a range of mixed use development and environmental improvements. To support the delivery of the remaining priorities identified the Town Centre Fringe Masterplan; development in this area should: a) Manage flood risk along the whole of the river corridor that incorporates enhanced river habitat and green infrastructure within the River Skerne Strategic GI corridor; b) Conserve historic buildings in the area, with an emphasis on creating opportunities for the celebration of Darlington's Heritage; c) Provide an improvement of existing housing in the area; d) Provide improvements in connectivity for pedestrians, cyclists and public transport into and through the area to allow access to jobs, leisure and business opportunities. Removal of the Gas Holder on Valley Street North poses a significant constraint to development and it's removal and site remediation at the earliest opportunity will be supported.'
Marion Williams	Environment Agency			DBDLP 1275	Policy TC 6	Darlington - Town Centre Fringe	Neutral	Point D) green corridor schemes is too weak. Enhance the ecological functioning of the river to achieve Water Framework Directive objectives	Noted and appropriate rewording suggested.	Reword of policy TC6 to: 'Development and regeneration of the Town Centre Fringe will be promoted throughout the plan period to deliver a range of mixed use development and environmental improvements. To support the delivery of the remaining priorities identified the Town Centre Fringe Masterplan; development in this area should: a) Manage flood risk along the whole of the river

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										corridor that incorporates enhanced river habitat and green infrastructure within the River Skerne Strategic GI corridor; b) Conserve historic buildings in the area, with an emphasis on creating opportunities for the celebration of Darlington's Heritage; c) Provide an improvement of existing housing in the area; d) Provide improvements in connectivity for pedestrians, cyclists and public transport into and through the area to allow access to jobs, leisure and business opportunities. Removal of the Gas Holder on Valley Street North poses a significant constraint to development and it's removal and site remediation at the earliest opportunity will be supported.'
Ms Julie Nixon				DBDLP326	9	ENVIRONMENT	Object	Development of this site will have an adverse impact on the local environment, resulting in the loss of valuable countryside/agricultural land and wildlife habitats. The plan does not deliver in terms of meeting any existing human or environmental concerns nor does it consider the need that many people have to connect with the natural world as part of the human psyche. The plan should be conserving and improving green space and include new tree planting and wetland creation. The Skerningham area is used for recreation by residents.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes. The landowners on the Skerningham site are working together to bring the site forward and have not indicated that there is any reason for any part of the site to be considered unavailable. Paragraph 72 of the NPPF is clear that larger scale development can often be the best way to secure the delivery of large numbers of new homes.	Please see officer response on the Skerningham Strategic Allocation.

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								How will this fit with the Brightwater Project? Houses should not be built in flood zones. Object to any loss of community woodland and impact on history /heritage and burial site. Development will put a strain on the town's already overstretched roads and services (including health, education and emergency services). The additional traffic will cause congestion, and affect people's health. Dispute the need for this many homes. The Government figure is much lower. Lets become a town that attracts more environmentally sensitive/friendly businesses. Why are we not regenerating existing properties and land. We should be encouraging environmentally friendly design, construction and materials. Building at Skerningham would be more detrimental and difficult as there are many more landowners involved than in other locations which is more costly and complicated.		

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MRS ELIZABETH WATSON				DBDLP875	9	ENVIRONMENT	Object	The Council set an excellent Tree and woodland strategy 2011-2020 to proactively manage and enlarge the tree population of the Borough of Darlington in order to protect our historic heritage of trees and provide a valued environmental amenity for future generations. Providing more housing units in inappropriate places e.g. Blackwell Meadows,Blackwell Grange East (HELAA009), Beaumont Hill (HELAA039) will have severe Impact on Biodiversity and Ecology.	Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. The policy is clear that any adverse effects on the environment should in the first instance be avoided and then mitigated where possible. Compensation will only be considered as a last resort. This approach is in line with national policy. Clause DIII of Policy ENV 7 has been amended to better reflect the provisions of paragraph 175c of the NPPF in respect of ancient woodland and ancient or veteran trees. Please see officer response on the Skerningham Strategic Allocation and Blackwell Grange East.	The penultimate sentence of Clause DIII of Policy ENV 7 has been amended to read: 'New development will not be permitted that would result in the loss, fragmentation, isolation or deterioration of ancient woodland or ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists~~theneed for and benefits of the development in that location clearly outweigh the harm~~.'
Marion Williams	Environment Agency			DBDLP1297	9	ENVIRONMENT	Neutral	Darlington has a general responsibility not to compromise the achievement of UK compliance with the Water Framework Directive (WFD). A fundamental objective of WFD is that there should be no deterioration in the ecological condition of any waterbody. It is also the default objective for every waterbody to be improved to good ecological potential by 2027. All waterbodies within the Darlington Borough Council currently fail to meet the criteria for good ecological status, or potential, and action is needed to improve the ecological condition of our waterbodies. Darlington needs to incorporate WFD priorities, and reflect Northumbria River Basin Management Plan (RBMP)	Comment noted. Changes have been made to policy ENV 4 to reflect the Council's obligations under the Water Framework Directive.	A new criterion has been added to Policy ENV 4 after criterion C (and necessary consequential changes to policy numbering have been made) to read: 'Expecting development to improve local water quality, wherever possible, taking into account the Northumbria River Basin Management Plan;' Draft Local Plan criterion D of Policy ENV 4 has been amended to read: 'D. Working with partners and the community to bring forward priority projects and measures identified in Darlington's Green Infrastructure Strategy and the Northumbria River Basin Management Plan; The following new text (along with the accompanying footnote) has been added to the supporting text of Policy ENV 4 after paragraph 9.4.10: 'The EU Water Framework Directive became part of UK law in 2003* with the primary objectives of achieving good ecological status in water bodies, and providing protection for drinking water sources and protected sites (Natura 2000 sites and Sites of Special Scientific Interest). These requirements are reflected in the Environment Agency's Northumbria River Basin Management Plan which covers the Darlington

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								information on waterbody improvement priorities, in local planning policies, Infrastructure Delivery Plans and in the determination of individual planning applications. Darlington must also consider what actions or measures contained in the RBMP relate to them and implement the necessary actions accordingly. The Local Plan uses the terms 'infrastructure' and 'green infrastructure' in several places. The Council should be specific when using the term 'infrastructure' whether this includes or excludes 'green infrastructure'.		Borough. In making decisions on spatial plans and planning applications, the Council has a duty to have regard to the Northumbrian River Basin Management Plan to ensure the protection and improvement of water quality. Changes to the design of development proposals will often avoid harm to water bodies. Development that would adversely affect the quality or quantity of surface or groundwater, flow of groundwater or ability to abstract water will not be permitted unless it can be demonstrated that no significant adverse impact would occur or mitigation can be put in place to minimise this impact within acceptable levels. *Water Environment (Water Framework Directive) Regulations 2003'
Ms Emily Hrycan	Historic England			DBDLP 1099		Safeguarding the Historic Environment	Object	Historic England is concerned that the Plan policies do not contain a robust framework to deliver the conservation and enhancement of the historic environment in Darlington and to guide how the presumption in favour of sustainable development should be applied locally. In particular: · There does not appear to be an adequate, up-to date and relevant evidence base on the historic environment. · It does not set out a positive and clear strategy for the historic environment – in both its policies and site allocations. · It does not contain strategic policies which would appropriately safeguard the area's heritage assets in particular Policy	DBC has engaged with Historic England during the preparation of the emerging Local Plan and will continue to do so as the plan progresses towards examination. Changes to the plans key heritage policies (ENV 1 and ENV 2) have been made to reflect discussions held with Historic England since the Draft Local Plan consultation stage. Where directed by Historic England, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified through this work have been included within the policy and/or supporting text.	Please see recommended changes to heritage policies. Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the the policy, supporting text and/or the Housing and Employment Statements as appropriate.

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								ENV1. · In terms of the site Allocations, no assessment has been made of the impact the principle of an allocation may have on the significance of the heritage assets (including within the SA). Reference is made to the need to consider this when the development comes forward but the Plan needs to demonstrate that the site can accommodate development to the quantum proposed without harm to the historic environment during the Plan making stage not be deferred to the application stage.		
Ms Emily Hrycan	Historic England			DBDLP 1100		Safeguarding the Historic Environment	Object	A requirement of the NPPF (Paragraph 169) is that a sound local plan will be based on a strong and up-to-date evidence base about the historic environment. This should be used to assess the significance of the heritage assets in the area and the contribution they make to the town. The draft plan does not appear to have this and therefore, Historic England objects to the Plan. Suggested amendments That an evidence base on the historic environment be put together to accompany the Plan prior to the next stage.	Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified have been included within policy and/or supporting text.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the the policy, supporting text and/or the Housing and Employment Statements as appropriate.
MR MICHAEL GREEN				DBDLP 237	9.1.2	Paragraph	Support	Support for paragraph 9.1.2 noted. Detailed comment relating to the heritage, environmental and archaeological significance of, and	In response to representations that highlighted the sensitivity of Site 009: Blackwell Grange East relative to the land to the south of the site, it is proposed to be replaced with revised	In response to representations that highlighted the sensitivity of Site 009: Blackwell Grange East relative to the land to the south of the site, it is proposed to be

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								community connection to, the Blackwell Grange East site (site ref 9). A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Object to the proposal to allocate Blackwell Grange East site (site ref 9) for residential development.	site 403. A plan of this change is available in Appendix 2b. Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified have been included within policy and/or supporting text.	replaced with revised site 403. A plan of this change is available in Appendix 2b. Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the the policy, supporting text and/or the Housing and Employment Statements as appropriate.
MR MICHAEL GREEN				DBDLP 274	9.1.2	Paragraph	Support	Support for paragraph 9.1.2 noted. Detailed comment relating to the heritage, environmental and archaeological significance of, and community connection to, the Blackwell Grange East site (site ref 9). A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Object to the proposal to allocate Blackwell Grange East site (site ref 9) for residential development.	In response to representations that highlighted the sensitivity of Site 009: Blackwell Grange East relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b. Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures have been included within the policy and/or supporting text.	In response to representations that highlighted the sensitivity of Site 009: Blackwell Grange East relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b. Depending on the outcome of the Council's Heritage Impact Assessment, changes to the plan may be necessary prior to the publication of the Submission Draft Local Plan.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 411	9.1.2	Paragraph	Object	No account has been taken of the historic environment in the Skerningham Strategic Allocation (including Skerningham Manor and the deserted medieval village).	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mrs Jennifer				DBDLP 445	9.1.2	Paragraph	Object	The Local Plan does not support the environment within the Skerningham and Barmpton area -	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.

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Bradley								it will destroy it. It may include new green areas but will destroy existing irreplaceable green areas.	The Local Plan should be read as a whole. All relevant policies in the plan will be taken into account when a planning application is submitted for the Skerningham Strategic Allocation. Therefore, the applicant will need to demonstrate that their proposals meet the requirements of not only Policy H 10, but also other relevant policies in the plan including those in the environment section.	
Mr Ralph Bradley				DBDLP463	9.1.2	Paragraph	Object	The Local Plan does not support the environment within the Skerningham and Barmpton area - it will destroy it. It may include new green areas but will destroy existing irreplaceable green areas.	Please see officer response on the Skerningham Strategic Allocation. The Local Plan should be read as a whole. All relevant policies in the plan will be taken into account when a planning application is submitted for the Skerningham Strategic Allocation. Therefore, the applicant will need to demonstrate that their proposals meet the requirements of not only Policy H 10, but also other relevant policies in the plan including those in the environment section.	Please see officer response on the Skerningham Strategic Allocation.
Mr Neil Minto				DBDLP816	9.1.7	Paragraph	Object	Yes the Quakers did a lot for the town. You seem to have forgotten the Town Library in Crown Street from your list!	Reference to the Crown Street Library is made in Appendix C: Darlington's Heritage Assets, however a further reference has been added to the supporting text to policy ENV 1.	The second sentence of paragraph 9.1.7 has been amended to read: '...including South Park, the indoor market and clock tower, Crown Street Library, and the Friends Meeting House.'
Mr David Clark				DBDLP68	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Object	There is no reference to the Skerningham medieval village in relation to the Skerningham Strategic Allocation. DBC has not listed this medieval village on page 138 of their consultation draft June 2018 when they have included many other medieval villages?	Skerningham deserted medieval village is not included in the lists of designated heritage assets on page 138 of the Draft Local Plan because it is not a designated asset. It is however included on the local Historic Environment Record (HER) maintained by Durham County Council. The area associated with the potential location of the deserted medieval village of Skerningham is included on Figure C.1 showing Areas of High	Please see officer response on the Skerningham Strategic Allocation.

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									Archaeological Potential, found in Appendix C of the Draft Local Plan. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report. Please see officer response on the Skerningham Strategic Allocation.	
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP840	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Object	It is not clear from reading Policy EN1 (C) what 'archaeological evaluation' relates to in the context of sites over 1 ha in size, whether this means a desk-based assessment, geophysical survey or trial trenching. Skerningham Estates Ltd suggests the following amendment to ensure consistency with the NPPF (para. 189). "Outside Areas of High Archaeological Potential, planning applications on sites of more than 1 hectare must be accompanied by an archaeological evaluation report, unless the area is already known to have been archaeologically sterilised by previous development (such as mineral extraction). The archaeological evaluation report should consist of a desk-based assessment. A geophysical survey and targeted trial trenching should only be undertaken if necessary."	Comment noted. This point is picked up in paragraph 9.1.21 of the supporting text to the policy and has been amended from the Draft Local Plan text to more closely reflect NPPF paragraph 189.	The first sentence of paragraph 9.1.21 has been amended to read: '...Durham County Council take the approach that an appropriate desk-based assessment and, where necessary, a field evaluation is required for all development proposals affecting an area of 1 hectare or more...'
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP860	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Object	**Conservation areas, listed buildings and historic parks and gardens** To ensure consistency with national planning policy, which allows harm to a heritage asset to be balanced against the public	Comments noted. Changes to Policy ENV 1 have been recommended following discussions with Historic England.	Please see recommended changes to Policy ENV 1: Protecting, Enhancing and Promoting Darlington's Historic Environment. The first sentence of paragraph 9.1.21 has been amended to read: '...Durham County Council take the approach that an appropriate desk-based assessment and, where necessary, a field evaluation is required for

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								benefits of a proposal (Paragraphs 133-134 of the 2012 NPPF and Paragraphs 195-196 of the 2018 NPPF), Policy ENV1 should be updated. In its current form, the parts of Policy ENV1 which relate to development (including demolition) within conservation areas and which affects listed buildings and historic parks and gardens do not allow for the public benefits of the proposal to be balanced against any harm which may be caused and is therefore not consistent with national planning policy. **Archaeological sites and scheduled monuments** There is no definition provided of an 'archaeological evaluation'. We would suggest that the following wording is added to the policy. It includes an acknowledgement that the information submitted with an application should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal, in line with the NPPF (Paragraph 128 or 189 of the 2012 and 2018 NPPF): <u>The archaeological evaluation report should consist of a proportionate desk-based assessment. A geophysical survey and targeted trial trenching should only be undertaken if necessary.</u>	Paragraph 9.1.21 of the supporting text to the policy specifies what is meant in terms of ecological evaluation. However, the text has been amended to more closely reflect NPPF paragraph 189. There is no conflict between the policies stance on securing the optimal viable use for heritage assets and paragraph 196 of the NPPF.	all development proposals affecting an area of 1 hectare or more...'

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								Non-designated heritage assets This part of Policy ENV1 is not consistent with either version of the NPPF (Paragraphs 135 and 197 respectively) which requires a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. In its current form, this part of Policy ENV1 does not have a positive approach to development affecting non-designated heritage assets and should be amended to be in line with the NPPF. **Securing optimum viable use** Both versions of the NPPF are clear that securing the optimum viable use may be a public benefit of a proposal and Planning Practice Guidance confirms that "harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset". This section of Policy ENV1 is not consistent with the relevant paragraphs of the 2012 and 2018 NPPFs and should not require all proposals to secure the optimum viable use of a heritage asset. **Energy efficiency** This part of Policy ENV1 does not reflect the balance of harm against the public benefits of a proposal as set out in the NPPF and should be amended to ensure consistency.		
Ms Emily	Historic England			DBDLP1151	Policy ENV 1	Protecting, Enhancing and	Object	Historic England's response contains detailed recommended changes to Policy ENV 1, a full	DBC had engaged with Historic England during the preparation of the Local Plan and will continue to do so	Please see recommended changes to heritage policies.

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Hrycan						Promoting Darlington's Historic Environment		copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal	as the plan progresses towards examination. Changes to the plans key heritage policies (ENV 1 and ENV 2) have been made to reflect discussions held with Historic England since the Draft Local Plan consultation stage.	
Mr G Raistrick		Mr Joe Ridgeon		DBDLP1251	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Object	Generally support Policy ENV1 but object to part A) Conservation Areas, which states that "Built development will not be permitted on public and private open spaces within or adjacent to conservation areas". Public and private open spaces within or adjacent to CA's may be most sustainable location for development and the Planning (Listed Buildings and Conservation Areas) Act 1990 and national guidance in both the NPPF and PPG provides specific protection for buildings and areas of special architectural and historic interest. Further protection and additional constraints are not required and is not "sound".	Changes to Policy ENV 1 have been made to reflect discussions held with Historic England since the Draft Local Plan consultation stage.	Please see recommended changes to heritage policies.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP413	9.1.12	Paragraph	Object	The statement that Listed buildings will be protected and great weight will be given to the conservation of heritage assets needs to be robustly supported. The Skerningham Strategic Allocation will flout this with regard to the Listed buildings within the allocation, the historic heritage of the site and the Deserted Medieval Village of Skerningham.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr David Clark				DBDLP69	9.1.13	Paragraph	Object	Skerningham Medieval village is historic village from Medieval times 1066-1540 forms part of proposed Skerningham 251 Map 7 but seems that DBC forgot to	Skerningham deserted medieval village is not included in the lists of designated heritage assets on page 138 of the Draft Local Plan because it is not a designated asset. It is however included on the local Historic Environment	Please see officer response on the Skerningham Strategic Allocation.

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								include this Medieval village on page 138?	Record (HER) maintained by Durham County Council. The area associated with the potential location of the deserted medieval village of Skerningham is included on Figure C.1 showing Areas of High Archaeological Potential, found in Appendix C of the Draft Local Plan. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report. Please see officer response on the Skerningham Strategic Allocation.	
Mr David Clark				DBDLP 70	9.1.19	Paragraph	Object	Skerningham Medieval village is within proposed 251 Map 7 but not appearing on DBC sites listed on page 138?	Skerningham deserted medieval village is not included in the lists of designated heritage assets on page 138 of the Draft Local Plan because it is not a designated asset. It is however included on the local Historic Environment Record (HER) maintained by Durham County Council. The area associated with the potential location of the deserted medieval village of Skerningham is included on Figure C.1 showing Areas of High Archaeological Potential, found in Appendix C of the Draft Local Plan. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report. Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Mr David				DBDLP 71	9.1.20	Paragraph	Object	Skerningham Medieval village within proposed development 251 Map 7 see attached.	Skerningham deserted medieval village is not included in the lists of designated heritage assets on page 138 of the Draft	Please see officer response on the Skerningham Strategic Allocation.

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Clark									Local Plan because it is not a designated asset. It is however included on the local Historic Environment Record (HER) maintained by Durham County Council. The area associated with the potential location of the deserted medieval village of Skerningham is included on Figure C.1 showing Areas of High Archaeological Potential, found in Appendix C of the Draft Local Plan. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report. Please see officer response on the Skerningham Strategic Allocation.	
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 1387	9.1.21	Paragraph	Object	Paragraph 9.1.21 requires field evaluation for all sites of 1ha or more. Skerningham Estates Ltd queries whether there will be a need for trial trenching, should a desk top assessment / geophysical survey not identify any unknown anomalies. Skerningham Estates Ltd suggests that this paragraph is amended as follows: *"Outside of the identified Areas of High Archaeological Potential, Durham County Council take the approach that desk-based assessment field evaluation is required for all development proposals affecting an area of 1 hectare or more, unless it is already known to have been archaeologically sterilised by previous development such as mineral extraction. Should the desk top assessment identify archaeological potential, a*	Comment noted. Paragraph 9.1.21 of the supporting text to the policy has been amended to more closely reflect NPPF paragraph 189.	The first sentence of paragraph 9.1.21 has been amended to read: '...Durham County Council take the approach that an appropriate desk-based assessment and, where necessary, a field evaluation is required for all development proposals affecting an area of 1 hectare or more...'

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								geophysical survey should be undertaken to identify any unknown anomalies. Following the results of the geophysical survey targeted trial trenching may then be required. The reasoning underpinning this is that archaeological investigation and research in recent decades has shown right across the country that the number and geospatial density of archaeological sites is far higher than previously imagined and so the likelihood of encountering archaeology on a site of this size or larger has increased."		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP1386	9.1.25	Paragraph	Object	Paragraph 9.1.25 advises that the council will seek to secure the optimum viable use for a building, and that it may be converted to a new use if it can be demonstrated that it will be compatible with its significance. The NPPF 2018 makes provision for public benefits to outweigh any harm which is not considered in this paragraph. The following change is suggested to this paragraph in accordance with the NPPF 2018 (para. 196): *"For statutorily protected buildings, those within conservation areas and non-designated heritage assets, the Council will seek to secure the optimum viable use. Keeping a building in its original use is preferred, as it generally has least impact on its character or appearance. It may be converted to a new use, if it can be demonstrated that it will be*	Objection noted. The change made to the supporting text is in line with paragraph 196 of the NPPF.	The final sentence of paragraph 9.1.25 has been amended to read: 'It may be converted to a new use, if it can be demonstrated that it will be compatible with the significance and the setting of the historic building, and not detract from other evidential, historic, aesthetic or communal heritage values, or unless there are public benefits which outweigh the harm.'

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								compatible with the significance and the setting of the historic building, and not detract from other evidential, historic, aesthetic or communal heritage values, or unless there are public benefits which outweigh the harm."		
Rosalind Kain	Darlington Borough Council			DBDLP2	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Support	The branchlines are not currently indicated on the Proposals Map. The two S&DR branchlines (historically known as Darlington and Croft) within the Borough should be added to the adopted version of the Map.	Agreed, the branchlines have been added to policies map.	The S&DR branchlines have been added to the policies map.
Mr Mike Allum	Durham County Council			DBDLP1056	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Neutral	Durham County Council welcome the acknowledgement of the importance of the assets connected to the railway and also the acknowledgement of the importance of partnership working with us. We would have concerns that the application of a 50m 'corridor' for the trackbed and branchlines may in practice prove overly restrictive and difficult to implement, however we remain committed to working with you to ensure a comprehensive and consistent policy approach for the asset.	Comment noted. Reference to the 50m corridor has been removed from Policy ENV 2.	Please see recommended changes to heritage policies.
Ms Emily Hrycan	Historic England			DBDLP1161	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Object	Historic England's response contains detailed recommended changes to Policy ENV 2, a full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal DBC had engaged with Historic England during the preparation of the Draft Local Plan and will	Please see recommended changes to the Local Plan's heritage policies (ENV 1 and ENV 2) which have been discussed and agreed with Historic England.	Please see recommended changes to the Local Plan's heritage policies (ENV 1 and ENV 2) which have been discussed and agreed with Historic England.

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								continue to do so as the plan progresses towards examination. Changes to the plans key heritage policies (ENV 1 and ENV 2) have been made to reflect discussions held with Historic England since the Draft Local Plan consultation stage.		
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP687	Policy ENV 3	Local Landscape Character	Support	CPRE welcomes the purposes of Policy ENV3 and notes the strong parallels with the purposes of Green Belt designation (NPPF para 80) such that it is not clear why the Local Plan does not simply designate Green Belt to fulfil the policy objectives. The gap between Low Coniscliffe and the urban area should be added as a rural gap. Policy ENV3,C): "Retain and improve…", should this not be "Retaining and improving…" Policy ENV3,D): "Protect and enhance…", should this not be "Protecting and enhancing…"?	The NPPF (paragraph 135) makes it clear that new Green Belts should only be established in exceptional circumstances. There has not been any major change in circumstances that would make the adoption of new Green Belt necessary, and normal planning and development management policies (including Policy ENV 3) are considered adequate to deal with development proposals around the Borough's settlements. The Local Plan sets out a clear strategy for the borough and identifies sufficient land to accommodate the identified needs of the Borough over the plan period. Low Coniscliffe was not identified under criterion A)1. of Policy ENV 3 due to the planning permission granted on land to the North East of the village (application reference 16/01231/FUL) between the village and the proposed development limit of Darlington, taking into account the South Coniscliffe Park allocation site (site ref. 41). However, the status of Low Coniscliffe as a rural village distinct from Darlington town has not changed in the Local Plan, as recognised by the settlement hierarchy (see pages 17-20 of the Draft Local Plan) and by the extent of the settlements development limit. Should planning permission for this site lapse in the future, the Council would be able to reconsider whether to include Low Coniscliffe under Policy	The start of Policy ENV 3 criterion C has been amended to read: 'Retaining and improving…' The start of Policy ENV 3 criterion D has been amended to read: 'Protecting and enhancing…'

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									ENV 3 criterion A)1 when reviewing the Local Plan.	
Marion Williams	Environment Agency			DBDLP1280	Policy ENV 3	Local Landscape Character	Neutral	The current green infrastructure should be maintained to benefit and maintain the species populations and habitats already present and to prevent their deterioration in the long term. B iii) All developments, particularly green corridors and green infrastructure should support the connectivity of habitats and wildlife. These connections should be increased in scope and scale and be of high biodiversity value to maintain the connectivity function.	Comment noted. The combination of Policies ENV 3, ENV 4, ENV 5 and ENV7 will help to maintain and enhance green and blue infrastructure across the Borough, and with it species populations and habitats. Criterion B)iii of Policy ENV 3 has been amended to reflect the comment.	Criterion B)iii of Policy ENV 3 has been amended to read: ' iii. Retain and support their connectivity for people, habitats and wildlife;'
Mr David Clark				DBDLP72	9.3.5	Paragraph	Object	Springfield Park has been there for many years and serves for the recreational purposes mental and physical health of many local residents yet DBC rejected having it designated as a green space? perhaps as the interested property developers had their sights set on it and want a access road on the land it is on?	Planning Practice Guidance states that: 'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.' Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation.

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									been reflected in the supporting text to Policy ENV 6. Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 418	9.3.5	Paragraph	Object	Applications for Local Green Space in the Skerningham area have been effectively suspended by the Skerningham Strategic Allocation "Masterplan" although they would all appear to compliment the sentiments of the statement.	Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position will be reflected in the supporting text to Policy ENV 6.	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.'
Dr Ellen Bekker	Lead Adviser Natural England			DBDLP 299	9.4.3	Paragraph	Support	Footnote 29 (p 84) should read 'In Darlington designated wildlife sites include Sites of Special Scientific Interest (SSSI)'.	Noted. The Local Plan has been amended accordingly.	Footnote 29 on page 84 has been amended to read: 'In Darlington designated wildlife sites include Sites of Special Scientific Interest (SSSI)...'
Alan Marshall	Mowden Ward Councillor			DBDLP 89	Policy ENV 4	Green Infrastructure	Support	Whilst supportive of Policy ENV 4, I would like to see Darlington's current urban tree canopy cover of 16% being enhanced by requiring housing developers to plant	The revised NPPF (2019) stipulates that local planning authorities should seek opportunities for achieving net environmental gains through development (such as through new habitat creation or improved public	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity.~~

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								enough trees so their canopy cover is at least 25%. This has been incorporated in the Wycombe Council Local Plan.	access to the countryside), including net gains for biodiversity. Policies ENV 4, ENV 6 and ENV 7 all seek to protect and enhance existing green infrastructure in the Borough, with Policy ENV 5 requiring new provision on developments over a certain size. As referred to under paragraph 9.6.12, the Council are also looking to identify a number of biodiversity offsetting sites to help compensate for the impact of development on biodiversity in the Borough where new provision cannot be made on-site in line with Policies ENV 7 and ENV 8. Policies ENV 7 and ENV 8 has been amended to reflect the revised NPPF expecting developments to provide net gains for biodiversity. Clause DIII of Policy ENV 7 has been amended to better reflect the provisions of paragraph 175c of the NPPF in respect of ancient woodland and ancient or veteran trees.	~~Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity~~ and geodiversity and ensure no net loss of the Borough's natural resourses~~.' The penultimate sentence of Clause DIII of Policy ENV 7 has been amended to read: 'New development will not be permitted that would result in the loss, fragmentation, isolation or deterioration of ancient woodland or ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists~~theneed for and benefits of the development in that location clearly outweigh the harm~~.'
Dave McGuire	Sport England (North East)			DBDLP 104	Policy ENV 4	Green Infrastructure	Object	Sport England's playing field policy allows the development of minor peripheral parts of a playing field site that are unsuitable for playing pitches provided the development does not; The proposed development affects only land incapable of forming part of a playing pitch and does not: • reduce the size of any playing pitch;	Comment noted. The policy wording of Policy ENV 4 has been amended to reflect the concerns of Sport England.	The first bullet point of criterion F iii of Policy ENV 4 has been amended to read: 'the sports facilities on the site would be best retained and enhanced through the development of ~~a small part of the site~~land that is incapable of forming part of a playing pitch and will not prejudice the use of the playing field, ~~and~~where the benefits of the development to sport and recreation clearly outweigh the loss of the land;'

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								• result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas); • reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality; • result in the loss of other sporting provision or ancillary facilities on the site; or • prejudice the use of any part of a playing field and any of its playing pitches. Sport England are concerned that the Plan's exception as written might legitimise situations where Sports Clubs see the selling of a land asset as being a quick and easy way of securing their financial future or enabling the development of a sports facility that could funded another way or isn't best sited there. Whilst not necessarily citing either of these scenarios, the Council should be mindful of what happened at the Railway Athletic Sports Ground where it was seen as expedient to sell over 25% of the site to residential development, yet now the site it too constrained to house all of the junior teams which are aligned to it and so additional		

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								pitches are being created at Staindrop Road. In light of the above Sport England wishes to object to Policy ENV4 F (iii)		
Charles Johnson	Conservative Group			DBDLP145	Policy ENV 4	Green Infrastructure	Neutral	We are concerned the amount of green infrastructure is being progressively reduced due to developments. Planning should seek to increase or at least maintain the current 16% green infrastructure.	The revised NPPF (2019) stipulates that local planning authorities should seek opportunities for achieving net environmental gains through development (such as through new habitat creation or improved public access to the countryside), including net gains for biodiversity. Policies ENV 4, ENV 6 and ENV 7 all seek to protect and enhance green existing green infrastructure in the Borough, with Policy ENV 5 requiring new provision on developments over a certain size. As referred to under paragraph 9.6.12, the Council are also looking to identify a number of biodiversity offsetting sites to help compensate for the impact of development on biodiversity in the Borough where new provision cannot be made on-site in line with Policies ENV 7 and ENV 8. Policies ENV 7 and ENV 8 has been amended to reflect the revised NPPF expecting developments to provide net gains for biodiversity.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity~~ and geodiversity and ensure no net loss of the Borough's natural resourses~~.'
Mr Richard Cowen	Acting Chair Durham Bird Club			DBDLP615	Policy ENV 4	Green Infrastructure	Object	The policy needs to take into account the benefits of Natural Capital. This now features in the revised NPPF paragraphs 170 and 171 and we believe takes the principle a step further than previously. The benefits are claimed to help well-being and so can assist in the health of the community and indeed create	DBC recognise the wider benefits from natural capital and ecosystems services. Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. However, it is acknowledged that the policy wording in Draft Local Plan Policies ENV 7 and ENV 8 could be amended to strengthen this objective and better reflect the	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:'

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								better environments for any workforce. While this Policy needs to go further specifically in creating habitats in appropriate places. This goes beyond say provided nest boxes for garden birds and should aim at bringing hirundines (swallows and martins), swifts and even, in appropriate cases, birds of prey into the work environment.	NPPF. This change her been recommended. The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referenced under several policies in the emerging Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 691	Policy ENV 4	Green Infrastructure	Neutral	Needs reference to 'net gain' for biodiversity and 25 Year Environment Plan.	Comment noted. Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. However, it is acknowledged that the policy wording in Draft Local Plan Policies ENV 7 and ENV 8 could be amended to strengthen this objective and better reflect the NPPF. This change has been recommended.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP 954	Policy ENV 4	Green Infrastructure	Support	There is a need to maintain and manage important green spaces, nature sites and to improve village services and infrastructure. For example Public Rights of Way are considered as important for public enjoyment of the countryside and highways improvements, such as street lighting, are required for reasons of highway safety.	Comment noted. Policies ENV 4 and ENV 5 recognise the importance of green infrastructure to the local environment and peoples health and wellbeing and seek to protect existing spaces, and deliver new spaces, as part of development. Public rights of way are afforded protection under Policies IN 1 and IN 2 of the Draft Local Plan. However, it has been acknowledged that the plan	Criterion e of Policy IN 1 has been amended to read: 'e. Protecting ~~Improving~~ and enhancing ~~protecting~~ public rights of way...' The following additional text has been added to the supporting text of Policy IN 1 between paragraphs 10.1.18 and 10.1.19: 'The Borough's network of public rights of way, including permissive routes, provides an important recreational resource that enables the public to experience and enjoy the natural, built and historic environments through activities such as walking, cycling and horse riding. As such, these routes play an

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								Retain a village character for Middleton St George, Maintain and where possible improve the quality of life for existing residents Maintain and where possible improve local services and infrastructure.	could be amended to more closely reflect the wording of the NPPF, and to provide clearer guidance on how development proposals affecting public rights of way will be considered. The village status of Middleton St George is recognised under Policy SH 1 and its supporting text, whilst Policy ENV 3 seeks to maintain the rural gaps between Middleton St George, Middleton One Row and Oak Tree. Where required, new services and infrastructure will be required alongside new development to support the needs of residents.	important role in ensuring the physical and mental health and wellbeing of residents as well as contributing to the Borough's visitor offer. The network is also an important sustainable transport resource, providing safe connections for low carbon forms of travel within, around and between settlements. Wherever possible, public rights of way should be retained in situ and their recreational and amenity value enhanced as a result of development, for example through improvements to surface and boundary treatments, and through the provision of improved facilities (such as gates, stiles and signage etc.). Developments that, through poor design, negatively affect the amenity of a public right of way will not be supported. In some circumstances, it may be more appropriate to divert the route of a public right of way along a suitable alternative route that provides at least as good recreational and amenity value as the one being replaced. Important factors to consider where a route is to be diverted will include the safety, directness, convenience and attractiveness of the right of way following development. Where possible, routes should be diverted to maintain key views and long range vistas. New development should not demonstrably deter the use of a public right of way.' Paragraph 10.1.19 of the Draft Local Plan has been amended to read: '~~For walking, the existing network of public rights of was is safeguarded by Policy ENV 4, and n~~New ~~W~~walking and cycling provision will be made within the Strategic and Local Green Corridors identified in ~~the~~ Darlington's Green Infrastructure Strategy, and covered by Policy ENV 4. These corridors...'
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP862	Policy ENV 4	Green Infrastructure	Object	Policy ENV4 is significantly more restrictive than both the 2012 and 2018 NPPFs in that the definition of green space provided at 9.4.3 includes all agricultural land, the urban fringe and open countryside,	Footnote 30 makes it clear that for the purposes of Policy ENV 4 criterion F the term green space refers to all public and private, formal and informal, types of green infrastructure listed under paragraph 9.4.3 excluding urban fringe, agricultural land and open countryside. Wildlife friendly green space is	The following definition of Blue Infrastructure has been added to the Glossary: 'Blue Infrastructure - Blue Infrastructure is a term used to describe a wide range of landscape elements linked to water including rivers, streams, lakes, pools, ponds and other water courses. Blue Infrastructure can include both natural and man-made landscape elements.'

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								as well as wildlife-friendly green space. Neither the 2012 nor 2018 NPPF apply such a stringent test to the development of green space. Footnote 6 of the 2018 NPPF are clear about which policies can indicate that development should be restricted. There is also no definition of "green and blue infrastructure" within the Local Plan. Policy ENV4 is therefore not positively prepared, justified or consistent with either the 2012 or 2018 NPPFs and should be amended.	however included in the definition and thereby offered protection by the policy. A definition of Green Infrastructure is provided in the Glossary to the Local Plan at Appendix A, however, a definition of Blue Infrastructure has also now been included.	
Marion Williams	Environment Agency			DBDLP 1283	Policy ENV 4	Green Infrastructure	Support	We support the opening paragraph. The wording of ENV4 sub-sections could be strengthened by the removal of caveats. For example: 'A. All new development….. ~~should~~ will through good design, ~~seek to~~ conserve and enhance…' The buffer for watercourses is not defined in the Green Infrastructure Strategy, although it does contain within the legend for the map of the Green Infrastructure Network, reference to a 30 metre buffer from Strategic Corridors (Tees & Skerne) and a 15 metre buffer from local corridors (West Beck, Cocker Beck, Baydale Beck). We recommend that in order to ensure the ecological functioning of	Comments noted. Agree with suggested changes regarding strengthening the wording of Policy ENV 4. Footnote 30 has been amended to refer to component parts of the green corridors forming constituting green spaces for the purpose of Policy ENV 4 criterion F.	Criterion A of Policy ENV 4 has been amended to read: 'All new development...~~should~~ will through good design,~~ seek to~~ conserve and enhance...' Criterion B of Policy ENV 4 has been amended to read: 'All new development that is crossed by a proposed strategic or local green corridor (...) ~~should~~will incorporate the green corridor into the sites layout and design.' Footnote 30 has been amended to read: 'For the purpose of Policy ENV 4 criterion F the term green space refers to all public and private, formal and informal, types of green infrastructure listed under paragraph 9.4.3, including component parts of the strategic and local green corridors, but excluding urban fringe, agricultural land,~~and~~ open countryside and private gardens.'

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								these watercourses the buffer strip should be at least the Flood Zone 3 outline or 50 metres, whichever is the greatest. 'B. All new developments that cross a proposed strategic or local green corridor will incorporate the green corridor into the sites layout and design' F. We suggest that 'Strategic and local green corridors', and in particular those around the Tees, Skerne, Cocker, West and Baydale Becks, as defined by the Darlington Green Infrastructure Strategy, are added to the exclusions detailed in footnote 30. The reason for this is that it could be difficult to determine if there was a surplus of such river corridor, difficult to replace such areas, and loss is likely to result in a deterioration of Water Framework Directive (WFD) status, or would compromise the achievement of WFD objectives, particularly where waterbodies are defined as already being heavily modified.		
Marion Williams	Environment Agency			DBDLP 1287	Policy ENV 4	Green Infrastructure	Neutral	ENV4 & 5: We would suggest considering Blue Green Infrastructure as a means of increasing resilience to urban flooding, note the Blue Green Space Adaption work by Newcastle University as examples of what might be achieved.	A definition of Blue Infrastructure has been provided in the Glossary to the Local Plan at Appendix A and Policy ENV 4 has been re-titled to raise the profile of blue infrastructure.	The following definition of Blue Infrastructure has been added to the Glossary: 'Blue Infrastructure - Blue Infrastructure is a term used to describe a wide range of landscape elements linked to water including rivers, streams, lakes, pools, ponds and other water courses. Blue Infrastructure can include both natural and man-made landscape elements.' The title of Policy ENV 4 has been amended to read: 'Green and Blue Infrastructure' The sub heading before paragraph 9.4.1 has been amended to read: 'Green and Blue Infrastructure'

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Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 694	Policy ENV 5	Green Infrastructure Standards	Neutral	Amend to 'Green Infrastructure *must* be designed a multifunctional *blue-green* spaces performing the above functions'	Agree in part.	The third paragraph of Policy ENV 5 has been amended to read: '~~Where appropriate~~ gGreen infrastructure should be designed as multi-functional blue-green space performing a range of the above functions.'
Marion Williams	Environment Agency			DBDLP 1286	Policy ENV 5	Green Infrastructure Standards	Neutral	Suggested revised wording 9.4.7: '…In addition, development of the Skerningham Strategic Allocation ~~is expected to~~ will include enhancements of the river corridor to the north of the town.'	Agree with suggested changes to supporting text.	The final sentence of paragraph 9.4.7 has been amended to read: 'In addition, development of the Skerningham Strategic Allocation (see Policy H 10) ~~is expected to~~ will include enhancements of the river corridor to the north of the town.'
Marion Williams	Environment Agency			DBDLP 1288	Policy ENV 5	Green Infrastructure Standards	Neutral	ENV4 & 5: We would suggest considering Blue Green Infrastructure as a means of increasing resilience to urban flooding, note the Blue Green Space Adaption work by Newcastle University as examples of what might be achieved.	A definition of Blue Infrastructure has been provided in the Glossary to the Local Plan at Appendix A and Policy ENV 4 has been re-titled to raise the profile of blue infrastructure.	The following definition of Blue Infrastructure has been added to the Glossary: 'Blue Infrastructure - Blue Infrastructure is a term used to describe a wide range of landscape elements linked to water including rivers, streams, lakes, pools, ponds and other water courses. Blue Infrastructure can include both natural and man-made landscape elements.' The title of Policy ENV 4 has been changed to read: 'Green and Blue Infrastructure' The sub heading before paragraph 9.4.1 has been amended to read: 'Green and Blue Infrastructure'
Dr Ellen Bekker	Lead Adviser Natural England			DBDLP 298	9.4.4	Paragraph	Support	The text refers to 'movement (see Policy N 1)'; we presume this is Policy IN 1.	Noted. The text has been corrected accordingly.	The final sentence of paragraph 9.4.4 has been amended to read: '...and movement (see Policy IN 1) across the Borough.'
Mr Simon Bainbridge	Member Barmpton and Skerningham	Mr Simon Bainbridge	Member Barmpton and Skerningham	DBDLP 421	9.4.5	Paragraph	Object	The Skerne buffer zone in the Skerningham Strategic Allocation would be destroyed by Route B of the inner Northern Link Road.	Only the outer link road route is now being explored and this has been reflected in changes to the policy wording and supporting text.	Please see officer response on the Skerningham Strategic Allocation.

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	Preservation Group		Preservation Group							
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP843	9.4.14	Paragraph	Object	Skerningham Estates Ltd notes and supports the comments regarding maintenance of green spaces but requests that a minor amendment is made 9.4.14: *... a maintenance levy will typically be applied…*	Comment noted. The supporting text to the policy has been amended to reflect this comment. It is acknowledged that there may be situations where other arrangements to maintain greenspaces may be more appropriate.	The second sentence of paragraph 9.4.14 has been amended to read: '...a maintenance levy will typically be applied...'
Alan Hutchinson	Whinfield Residents Association			DBDLP168	Policy ENV 6	Local Green Space	Object	The following sites should be designated as Local Green Spaces: (i) LGS02 – Springfield Park (ii) LGS03 – Green Lane (iii) LGS04/LGS013 – Skerningham Countryside Park (iv) LGS07 – Muscar House Farm (v) LGS08 – Sparrowhall Drive The fact that Skerningham Countryside Park was proposed by 2 different organisations is indicative of the importance that local communities place on this particular site. There is no mention of the sensitivity surrounding burial sites in Skerningham Countryside Park, nor any proposal to accommodate them into the masterplan. Using the proposed Skerningham masterplan as a pretext for refusing to include the sites is unfair and not in the public interest. It presupposes that the masterplan is all-powerful and supersedes any other compelling	Planning Practice Guidance states that: *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has been reflected in the supporting text to Policy ENV 6. Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation. The name of site LGS01 has been changed to 'Beech Wood'.

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								evidence. The LGS sites should inform the masterplan, and not vice versa. If the sites meet the criteria for Local Green Designation on their merits then they should be so designated, irrespective of whether DBC would find that to be inconvenient for their so-called "masterplan". We welcome the designation of LGS01, but it should be noted that the site is known locally as "Beech Wood", and not "Beech Road/Winbush Park" [sic – usual spelling is "Whinbush"].	Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	
Charles Johnson	Conservative Group			DBDLP147	Policy ENV 6	Local Green Space	Object	The table shows an extremely limited list of local green space, a survey carried out a few years ago listed a wealth of green spaces. Why is the list limited?	Green spaces listed under Policy ENV 6 are being designated as Local Green Space. These are a relatively new type of designation enabling local communities to identify green areas of particular importance to them for special protection through either a local or neighbourhood plan. The NPPF makes it clear that Local Green Space designation will not be appropriate for most green areas and sets out strict criteria that must be met to justify designation. A number of additional Local Green Space submissions have been made during the consultation on the Draft Local Plan and have been assessed in line with the existing methodology prior to making a decision on what sites should be designated in the Proposed Submission Local Plan.	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.'

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									All other green spaces are however still offered protection under Policy ENV 4 and the NPPF. Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has been reflected in the supporting text to Policy ENV 6.	
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP422	Policy ENV 6	Local Green Space	Object	The following were some of the Local Green Spaces which were nominated for inclusion in the Draft Local Plan: (i) LGS02 – Springfield Park (ii) LGS03 – Green Lane (iii) LGS04/LGS013 – Skerningham Countryside Park (iv) LGS07 – Muscar House Farm (v) LGS08 – Sparrowhall Drive (vi) LGS01- Beech Wood Only LGS01 (Beech Wood) has been approved. The Local Green Spaces Report, which rejects the other 5 sites uses the phrase: *"Site is within a potential strategic allocation area. Development of this area is to be informed by a*	Planning Practice Guidance states that: *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has been reflected in the supporting text to Policy ENV 6.	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation. The name of site LGS01 has been changed to 'Beech Wood'.

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								masterplan……Scoped out of assessment and not recommended for designation." We believe that using the proposed Skerningham Strategic Allocation Masterplan as a pretext for refusing to include the sites is not in the public interest. It presupposes that the Masterplan is all-powerful and supersedes any other compelling evidence for Local Green Space designation. The LGS sites should inform the Masterplan, and not vice versa. If the sites meet the criteria for Local Green Designation on their merits then they should be so designated, irrespective of the "Masterplan" which has not even reached a stage where it might be considered in the public domain.	Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 693	Policy ENV 6	Local Green Space	Object	CPRE welcomes the use of the new designation of Local Green Spaces in Policy ENV 6 and the recognition that these can also be designated through Neighbourhood Plans. However, the number of sites designated looks a very short list. How does it relate to the Open Spaces Strategy where many sites were listed? CPRE understands local Parish Councils and organisations were asked to submit its of spaces they considered should be "Local Green Spaces", but many have been turned down and for some there had been no response at the time of writing this submission. It is	The NPPF makes it clear that Local Green Space designation will not be appropriate for most green areas and sets out strict criteria that must be met to justify designation. A report setting out the Council's consideration of potential Local Green Spaces sites is available on the Council's website. The Council has reviewed submissions made as part of the Draft Local Plan consultation prior making a decision on what sites should be included in the Proposed Submission Draft Local Plan. All other green spaces are however still offered protection under Policy ENV 4 and the NPPF.	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' The following sentence has been added to paragraph 9.5.5: 'In addition to the Local Plan, communities have the opportunity to identify and designate land as Local Green Spaces in neighbourhood plans.'

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								known that some, such as Whinfield Residents Association and Middleton St George Parish Council are pursuing the matter, but it is still cause for great concern as these spaces are crucial to residents' quality of life.	Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has been reflected in the supporting text to Policy ENV 6. A reference has been added to the supporting text of Policy ENV 6 to acknowledge that communities can identify and designate Local Green Spaces in neighbourhood plans.	
Mr Alan Hutchinson				DBDLP 754	Policy ENV 6	Local Green Space	Object	I strongly object to DBC rejecting applications for certain Local Green Spaces in the Draft Local Plan. In particular LGS02 (Springfield Park) and LGS04/LGS013 (Skerningham Countryside Park) would appear to clearly meet the criteria. To dismiss them because of the spurious reason that the areas are covered by a masterplan which has to take precedence is not good enough. The designation of the Local Green Spaces should come first on their merits, then the masterplan adapts to what is already there.	Planning Practice Guidance states that: *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation.

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									been reflected in the supporting text to Policy ENV 6. Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	
Mr A Macnab	Middleton St George Parish Council			DBDLP822	Policy ENV 6	Local Green Space	Neutral	We are pleased to see that a number of sites proposed by the Parish Council have been included in the Draft Local Plan (Playing Field at Station Road, Water Park, and Almora Hall field). We have now submitted evidence for more spaces on the list which we expect to also be included in the Local Plan (including: The Front at Middleton One Row, Haxby Road Play Area, the 3 Allotments, Green Gap/Field at Middleton Lane, St George's Church, The Whinnies, etc.) We will continue with this task.	The Council has assessed new Local Green Space submissions made as part of the Draft Local Plan consultation, in line with the existing methodology, prior making a decision on what sites should be designated in the Proposed Submission Local Plan.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the the policy, supporting text and/or the Housing and Employment Statements as appropriate.
Mrs Liz Knight				DBDLP963	Policy ENV 6	Local Green Space	Object	The following sites should be designated as Local Green Spaces: (i) LGS02 – Springfield Park (ii) LGS03 – Green Lane	Planning Practice Guidance states that: *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable*	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any

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								(iii) LGS04/LGS013 – Skerningham Countryside Park (iv) LGS07 – Muscar House Farm (v) LGS08 – Sparrowhall Drive The fact that Skerningham Countryside Park was proposed by 2 different organisations is indicative of the importance that local communities place on this particular site. There is no mention of the sensitivity surrounding burial sites in Skerningham Countryside Park, nor any proposal to accommodate them into the masterplan. Using the proposed Skerningham masterplan as a pretext for refusing to include the sites is unfair and not in the public interest. It presupposes that the masterplan is all-powerful and supersedes any other compelling evidence. The LGS sites should inform the masterplan, and not vice versa. If the sites meet the criteria for Local Green Designation on their merits then they should be so designated, irrespective of whether DBC would find that to be inconvenient for their so-called "masterplan". We welcome the designation of LGS01, but it should be noted that the site is known locally as "Beech Wood", and not "Beech Road/Winbush Park" [sic – usual spelling is "Whinbush"].	*locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has been reflected in the supporting text to Policy ENV 6. Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation. The name of site LGS01 has been changed to 'Beech Wood'.

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Mr Knight				DBDLP968	Policy ENV 6	Local Green Space	Object	The following sites should be designated as Local Green Spaces: (i) LGS02 – Springfield Park (ii) LGS03 – Green Lane (iii) LGS04/LGS013 – Skerningham Countryside Park (iv) LGS07 – Muscar House Farm (v) LGS08 – Sparrowhall Drive The fact that Skerningham Countryside Park was proposed by 2 different organisations is indicative of the importance that local communities place on this particular site. There is no mention of the sensitivity surrounding burial sites in Skerningham Countryside Park, nor any proposal to accommodate them into the masterplan. Using the proposed Skerningham masterplan as a pretext for refusing to include the sites is unfair and not in the public interest. It presupposes that the masterplan is all-powerful and supersedes any other compelling evidence. The LGS sites should inform the masterplan, and not vice versa. If the sites meet the criteria for Local Green Designation on their merits then they should be so designated, irrespective of whether DBC would find that to be	Planning Practice Guidance states that: *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. This position has been reflected in the supporting text to Policy ENV 6. Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation. The name of site LGS01 has been changed to 'Beech Wood'.

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								inconvenient for their so-called "masterplan". We welcome the designation of LGS01, but it should be noted that the site is known locally as "Beech Wood", and not "Beech Road/Winbush Park" [sic – usual spelling is "Whinbush"].		
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1033	Policy ENV 6	Local Green Space	Object	The proposed allocation of Merrybent Community Woodland as a local green space within policy ENV 6 is supported. However, LCMPC object to the lack of inclusion of the medieval manor, dovecot and tower at Low Coniscliffe, Merrybent Drive green, Merrybent Green and Low Coniscliffe green space, as set out within the LCMNP. Full details of the proposals are contained within a local green space background paper, this sets out the demonstrable importance of these spaces to the local community.	Support noted. A reference has been added to the supporting text of Policy ENV 6 to acknowledge that communities can identify and designate Local Green Spaces in neighbourhood plans.	The following sentence has been added to paragraph 9.5.5: 'In addition to the Local Plan, communities have the opportunity to identify and designate land as Local Green Spaces in neighbourhood plans.'
Major Frederick Greenhow MBE				DBDLP 97	9.5.3	Paragraph	Object	The following areas should be designated as Local Green Space: • Skerningham Countryside Park • Muscar House Farm • Springfield Park & Green Lane A lot of evidence was provided by the Whinfield Residents Association (WRA), believing that the above plus other sites met with the Local Green Space designation.	Planning Practice Guidance states that: *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is	A new paragraph has been added under 9.5.6 to read: 'Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.' Please see officer response on the Skerningham Strategic Allocation.

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								Both the Barmpton & Skerningham Preservation Group (BSPG) and the WRA supported by their residents / communities and our local MP - Jenny Chapman MP (who herself walked this ground on the 4th November 2017) have strongly highlighted the importance that Skerningham Country Park in particular should remain a 'Green Space' and not become a development site.	more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process. Following additional engagement with the public and other stakeholders on the future of Springfield Park in January 2020, organised at the request of Council Members, the park has been removed from the Skerningham Strategic Allocation site. As a result of this change in the status of Springfield Park, it has been reassessed as a potential Local Green Space, and is recommended to be added as a Local Green Space in the Proposed Submission Local Plan. Please see officer response on the Skerningham Strategic Allocation.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP227	9.6.1	Paragraph	Object	The Council is prioritising short term growth ahead of longer term more sustainable proposals to mitigate flood risk, and safeguard and enhance biodiversity. Efforts to preserve and enhance biodiversity can add to the size of growth of the economy and peoples well-being. The Local Plan outputs should be more balanced between the economy and biodiversity. Stronger biodiversity outputs should include no net losses but instead net gains. Examples should include housing/employment proposals being sympathetic to the existing wildlife and their habitat and	The Local Plan provides a long term 20 year plan for the Boroughs growth and development. The Council has adopted a balanced strategy to meeting its housing requirement through the allocation in the Draft Local Plan of 26 sites of which 14 sites are 150 dwellings or less, and a further 6 sites are under 500 dwellings. Furthermore, the sites are appropriately spread across urban extensions, the urban area and the Boroughs larger service villages. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). Policy ENV 7 seeks to deliver net gains for biodiversity as a result of	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'

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								promote its longevity. Nest boxes, hedgehog highways, fruit trees in gardens, nectar-rich planting for our pollinators and even wall cavities for bats and starlings. Further measures include increasing the size of green infrastructure buffer zones surrounding new developments and new roads to 100m on all sides. Red Hall Nature Reserve and the new road is a good example of this. Ingenium Parc is being developed along these lines and if this continues this will be another good example of Green Infrastructure working. The financial contribution from each development and business rate levy for employment sites could be used to fund ongoing management and maintenance of the nature reserve and the landscaped area surrounding each development / industrial unit.	development. However, it is acknowledged that the policy wording in Draft Local Plan Policies ENV 7 and ENV 8 could be amended to strengthen this objective and better reflect the NPPF. This change has been recommended. The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referenced under several policies in the emerging Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP230	9.6.2	Paragraph	Support	Farmland species are declining in the borough and these must be included in proposals to protect and enhance biodiversity.	Support noted. Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. However, it is acknowledged that the policy wording in Policies ENV 7 and ENV 8 could be amended to strengthen this objective and better reflect the NPPF.	Amend the third paragraph of Policy ENV 7 to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' Amend the final sentence of the second paragraph of Policy ENV 8 to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'
Dr Ellen	Lead Adviser			DBDLP300	9.6.2	Paragraph	Support	Footnote 37 refers to the Conservation of Habitats and	Noted. The reference in footnote 37 has been updated.	Footnote 37 has been amended to read: "Natural Environment and Rural Communities (NERC) Act

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Bekker	Natural England							Species Regulations 2010, which should now be 2017.		2006, and the Conservation of Habitats and Species Regulations 2017~~2010~~"
Mr David Phillips	Darlington Friends of the Earth			DBDLP 231	9.6.5	Paragraph	Support	Farmland species are declining in the borough and these must be included in proposals to protect and enhance biodiversity.	Support noted. Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. However, the policy wording in Policies ENV 7 and ENV 8 has been amended to strengthen this objective and better reflect the NPPF.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfil its planning duties in relation to minimising impacts on and providing net gains for biodiversity~~ and geodiversity and ensure no net loss of the Borough's natural resources~~.'
Mr Ben Lamb	manager Tees Rivers Trust			DBDLP 31	Policy ENV 7	Biodiversity and Geodiversity and Development	Neutral	Recommendation that implementation of the Your Tees Catchment Partnership (YTCP) Management Plan should also be supported within the plan.	Comment noted. Changes have been made to policy ENV 4 to reflect the Council's obligations under the Water Framework Directive.	A new criterion has been added to Policy ENV 4 after criterion C (along with necessary consequential changes to policy numbering) to read: 'Expecting development to improve local water quality, wherever possible, taking into account the Northumbria River Basin Management Plan;' Criterion D of Draft Local Plan Policy ENV 4 has been amended to read: 'D. Working with partners and the community to bring forward priority projects and measures identified in Darlington's Green Infrastructure Strategy and the Northumbria River Basin Management Plan; The following new text (along with the accompanying footnote) has been added to the supporting text of Policy ENV 4 after paragraph 9.4.10: 'The EU Water Framework Directive became part of UK law in 2003* with the primary objectives of achieving good ecological status in water bodies, and providing protection for drinking water sources and protected sites (Natura 2000 sites and Sites of Special Scientific Interest). These requirements are reflected in the Environment Agency's Northumbria River Basin Management Plan which covers the Darlington Borough. In making decisions on spatial plans and planning applications, the Council has a duty to have

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										regard to the Northumbrian River Basin Management Plan to ensure the protection and improvement of water quality. Changes to the design of development proposals will often avoid harm to water bodies. Development that would adversely affect the quality or quantity of surface or groundwater, flow of groundwater or ability to abstract water will not be permitted unless it can be demonstrated that no significant adverse impact would occur or mitigation can be put in place to minimise this impact within acceptable levels. *Water Environment (Water Framework Directive) Regulations 2003'
Alan Hutchinson	Whinfield Residents Association			DBDLP169	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	If even only part of the Skerningham Countryside Park were lost, biodiversity would be adversely affected. It is difficult to comprehend how the proposed relocation of the golf course would enhance or protect the River Skerne Strategic Corridor. The Skerningham masterplan conflicts with Point DIII and H of Policy ENV 7. There appear to be no environmental benefits to residents of Whinfield in allowing the relocation of the golf course.	Please see officer response on the Skerningham Strategic Allocation. The Skerningham Strategic Allocation does not conflict with Policy ENV 7 criterion DIII and H. The Council would argue that the benefits of the strategic allocation clearly outweigh any resulting loss, and that Policy H 10 requires suitable replacement planting to be undertaken, resulting in a net increase in the area of community woodland as a result of development. The site is required to provide a pattern of well integrated and interconnected green spaces across the site, protect the amenity of existing residential properties (in line with Policy DC 3) and retain and enhance existing hedgerows and trees wherever possible together with other measures.	Please see officer response on the Skerningham Strategic Allocation.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preserva	DBDLP424	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	It is difficult to comprehend how the proposed relocation of the golf course would enhance or protect the River Skerne Strategic Corridor, or how the corridor could be maintained if the inner	Please see officer response on the Skerningham Strategic Allocation. Only the outer link road route is now being explored and this has been reflected in changes to the policy wording and supporting text.	Please see officer response on the Skerningham Strategic Allocation.

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			tion Group					Northern Link Road proposal, Route B were built.		
Allan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 696	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	Whilst CPRE agrees with the concepts in Policy ENV7 and wishes to support it, we find the wording and referencing chaotic, vague and imprecise and in places, repetitive, for example: 1. Local Nature Reserves and Local Wildlife Sites appear in both Policy ENV7.D and ENV7. E and F. 2. Policy ENV3.C. Rural area: There is an earlier intimation that "…the areas listed below, as identified on the Policies Map,…", but in the legend for the mapping there is no designated colouring/hatching/etc, for "Rural area" – or is it the lack of colouring/hatching/etc that is significant? CPRE is concerned when wording and referencing is imprecise and open to legal challenge. Precision in language is essential, especially in view of the number of cases relating to planning applications which have been taken to the courts where words, sentences and punctuation have been forensically analysed for meaning and where case law upholds it is what a policy says the matters, not its intention.	Comment noted. The policy has been amended to clarify these points.	Part DII of Policy ENV 7 has been amended to read: '**II. Local Nature Reserves and Local Wildlife Sites** Development likely to have an adverse effect on any of the Borough's Local Nature Reserves or Local Wildlife Sites will only be permitted if it can be shown that the reasons for the development or benefits to the local community from the development outweigh the interest or value of the site and any harm can be overcome by mitigation or compensation measures. Designate new Local Nature Reserves which meet the Natural England Criteria to ensure the protection of land and species, including Red Hall Wetland, Mill Lane (spanning the Skerne), and Cocker Beck. Local Wildlife Sites are identified and selected for their local nature conservation value. They protect threatened species and habitats acting as buffers, stepping stones and corridors between nationally-designated wildlife sites. Darlington has sites such as Blackwell Meadows, Coatham Grange and West Cemetery.' The following statement after Policy ENV 7 criterion DIII has been deleted: '~~New wildlife sites will be designated as appropriate.~~' Criterion E and F of Policy ENV 7 have been deleted.

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Mr Richard Cowen	Acting Chair Durham Bird Club			DBDLP 619	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	While Durham Bird Club clearly supports policies to protect biodiversity (particularly in relation to birds) we are concerned about a number of developments that have taken place in Darlington or are proposed that may have a detrimental impact on this (including proposals at Conisciffe and Skerningham). We note the proposals of the revised NPPF in respect of compensation (eg paragraphs 32 and 175) and also the impact of Footnote 6 to it. We trust that the issue of compensation is one that should arise only very rarely but when it does, it is likely to impact on an important site. As far as woodland is concerned, we note the provisions of the revised NPPF relating to ancient woodland and ancient or veteran trees at paragraph 175(c) and question whether this wording in this Policy is wholly consistent it.	Noted. The second paragraph of Policy ENV 7 makes it clear that compensation would only be considered appropriate as a last resort. Policies ENV 7 and ENV 8 will be amended to reflect the revised NPPF expectation that developments provide net gains for biodiversity. Clause DIII of Policy ENV 7 will be amended to better reflect the provisions of paragraph 175c of the NPPF in respect of ancient woodland and ancient or veteran trees.	Amend the third paragraph of Policy ENV 7 to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' Amend the final sentence of the second paragraph of Policy ENV 8 to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity~~ and geodiversity and ensure no net loss of the Borough's natural resources~~.' Amend the penultimate sentence of Clause DIII of Policy ENV 7 to read: 'New development will not be permitted that would result in the loss, fragmentation, isolation or deterioration of ancient woodland or ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists~~theneed for and benefits of the development in that location clearly outweigh the harm~~.'
Mr Richard Cowen	Acting Chair Durham Bird Club			DBDLP 624	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	While Durham Bird Club clearly supports policies to protect biodiversity (particularly in relation to birds) we are concerned about a number of developments that have taken place in Darlington or are proposed that may have a detrimental impact on this (including proposals at Conisciffe and Skerningham). We note the proposals of the revised NPPF in respect of compensation (eg paragraphs 32 and 175) and also the impact of Footnote 6 to it. We trust that the issue of compensation is one that	Noted. The second paragraph of Policy ENV 7 makes it clear that compensation would only be considered appropriate as a last resort. Policies ENV 7 and ENV 8 has been amended to reflect the revised NPPF expectation that developments provide net gains for biodiversity. Clause DIII of Policy ENV 7 has been amended to better reflect the provisions of paragraph 175c of the NPPF in respect of ancient woodland and ancient or veteran trees.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity~~ and geodiversity and ensure no net loss of the Borough's natural resources~~.'

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								should arise only very rarely but when it does, it is likely to impact on an important site. As far as woodland is concerned, we note the provisions of the revised NPPF relating to ancient woodland and ancient or veteran trees at paragraph 175(c) and question whether this wording in this Policy is wholly consistent it.		The penultimate sentence of Clause DIII of Policy ENV 7 has been amended to read: 'New development will not be permitted that would result in the loss, fragmentation, isolation or deterioration of ancient woodland or ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists~~theneed for and benefits of the development in that location clearly outweigh the harm~~.'
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 695	Policy ENV 7	Biodiversity and Geodiversity and Development	Neutral	Reference to net gain for biodiversity and 25 Year Environment Plan.	Policies ENV 7 and ENV 8 has been amended to reflect the revised NPPF expecting developments to provide net gains for biodiversity and the Governments 25 Year Environment Plan.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity and geodiversity and ensure no net loss of the Borough's natural resourses.'
Mrs Liz Knight				DBDLP 964	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	If even only part of the Skerningham Countryside Park were lost, biodiversity would be adversely affected. It is difficult to comprehend how the proposed relocation of the golf course would enhance or protect the River Skerne Strategic Corridor. The Skerningham masterplan conflicts with Point DIII and H of Policy ENV 7. There appear to be no environmental benefits to residents	Please see officer response on the Skerningham Strategic Allocation. The Skerningham Strategic Allocation does not conflict with Policy ENV 7 criterion DIII and H. The Council would argue that the benefits of the strategic allocation clearly outweigh any resulting loss, and that Policy H 10 requires suitable replacement planting to be undertaken, resulting in a net increase in the area of community woodland as a result of development. The site is required to provide a pattern of well integrated and interconnected green spaces across the site, protect the	Please see officer response on the Skerningham Strategic Allocation.

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								of Whinfield in allowing the relocation of the golf course.	amenity of existing residential properties (in line with Policy DC 3) and retain and enhance existing hedgerows and trees wherever possible together with other measures.	
Mr Knight				DBDLP969	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	If even only part of the Skerningham Countryside Park were lost, biodiversity would be adversely affected. It is difficult to comprehend how the proposed relocation of the golf course would enhance or protect the River Skerne Strategic Corridor. The Skerningham masterplan conflicts with Point DIII and H of Policy ENV 7. There appear to be no environmental benefits to residents of Whinfield in allowing the relocation of the golf course.	Please see officer response on the Skerningham Strategic Allocation. The Skerningham Strategic Allocation does not conflict with Policy ENV 7 criterion DIII and H. The Council would argue that the benefits of the strategic allocation clearly outweigh any resulting loss, and that Policy H 10 requires suitable replacement planting to be undertaken, resulting in a net increase in the area of community woodland as a result of development. The site is required to provide a pattern of well integrated and interconnected green spaces across the site, protect the amenity of existing residential properties (in line with Policy DC 3) and retain and enhance existing hedgerows and trees wherever possible together with other measures.	Please see officer response on the Skerningham Strategic Allocation.
Marion Williams	Environment Agency			DBDLP1289	Policy ENV 7	Biodiversity and Geodiversity and Development	Neutral	The wording of ENV7 does not secure the achievement of the DEFRA 25 Year Plan of net environmental gain. Suggest revised 3rd para: 'Development should will enhance biodiversity in order to provide environmental net gains where possible by…' We support and applaud the specific actions listed for the River Tees and the River Skerne Strategic Corridors. We suggest that the Cocker Beck/West Beck/Baydale Beck system is also	Comments noted. Policies ENV 7 and ENV 8 have been amended to reflect the revised NPPF expecting developments to provide net gains for biodiversity. The River Tees and River Skerne are the two main rivers crossing the borough and both identified in Darlington's Green Infrastructure Strategy as strategic green corridors, therefore, given their status it was considered appropriate that Policy ENV 7 sets out specific actions for both river corridors. Whilst also clearly important, in order to minimise the length of this strategic policy, it was	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'

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								included with specific actions listed. The Council should consider for inclusion in the list of priorities specific water dependent sites that are upstream of proposed development allocations and so could be contributing natural flood management benefits. Of particular relevance is the Burtree Marshes LWS. There is also potential to enhance the ecological condition of the floodplain around Broken Scar that may have downstream flood risk benefits and provide a strategic wildlife offer on a sub-regional/regional scale. A & B Invasive species – revised wording to 'manage, and where possible eradicate'	not considered prudent to include specific measures for the other watercourses referred to within the policy. However, it is recognised that the policies supporting text could include a reference to the actions set out in the GI Strategy for the other strategic and local green corridors, including the Cocker Beck, West Beck and Baydale Beck.' The final sentence of Policy ENV 8 has been amended accordingly to reflect the comment regarding invasive species.	The following text has been added as a new paragraph after paragraph 9.6.6: 'Darlington's Green Infrastructure Strategy includes a number of measures to improve the environmental and recreational value of the borough's strategic and local green corridors, and should be read alongside this policy when considering development proposals affecting a green corridor.' The final sentence of Policy ENV 8 has been amended to read: 'Where developers identify the presence of non-native invasive species on-site, measures will be required to contain the species and ensure it is effectively managed, or where possible eradicated,~~dealt with~~ during development.
Major Frederick Greenhow MBE				DBDLP 100	Policy ENV 8	Assessing a Developments Impact on Biodiversity	Object	The Biodiversity and Geodiversity would be greatly affected by any development on Skerningham Countryside Park. The building of houses and a new golf club would not protect wildlife and fauna along the Skerne Corridor - but would have a complete adverse affect. You cannot build a woodland overnight it takes 10 - 20 years. I strongly object to the development within Skerningham Country Park as there are no environmental benefits whatsoever to either the communities, wildlife and landscape - only detrimental effects.	Please see officer response on the Skerningham Strategic Allocation.	Please see officer response on the Skerningham Strategic Allocation.
Dr Ellen	Lead Adviser			DBDLP 301	Policy ENV 8	Assessing a Developmen	Support	Policy ENV 8 should read 'Assessing a Development's Impact on Biodiversity' or	Comments noted. The plan should be read as a whole and it is not necessary to add cross references to other policies	The title of Policy ENV 8 has been amended to read: 'Assessing a Development's Impact on Biodiversity'.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
Bekker	Natural England					ts Impact on Biodiversity		'Assessing Development Impacts…'. There should also be clarity that this policy does not override ENV 7 D (I), in particular that development that has adverse effects would not normally be permitted and would only be allowed in certain circumstances. In addition, compensation for significant harm to a SSSI will need to be determined on a case-by-case basis (as the policy refers to creating priority habitats, but it will depend on the SSSI affected, which type of mitigation would be appropriate).	in most circumstances. Given that Policy ENV 8 follows immediately on from ENV 7 it is not considered necessary in this case. In addition, it not considered necessary to refer to compensation being considered on a case-by-case basis. Policy ENV 7 makes it clear that compensation for significant adverse effects to biodiversity or geodiversity will only be considered as a last resort. This implies that each case will need to be considered on their own merits to determine whether or not it would be considered acceptable. The title of Policy ENV 8 has been amended accordingly.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 697	Policy ENV 8	Assessing a Developments Impact on Biodiversity	Neutral	There is almost a feeling that if a developer follows this procedure and submits an application having followed it they will get permission. Is this not a "how to do it", a process, rather than a policy?	The policy follows the 'mitigation hierarchy' set out in paragraph 175 a) of the NPPF. Policy ENV 7 makes it clear that compensation for significant adverse effects to biodiversity or geodiversity will only be considered as a last resort. Policy ENV 8 makes it clear to applicants how planning applications affecting biodiversity interests will be considered, and the information that will be required to determine them. However, the wording of Policy ENV 8 has been amended to strengthen the principle that significant harm to biodiversity should be avoided wherever possible.	The first sentence of Policy ENV 8 has been amended to read: '...will need to follow the ~~following~~ sequence of actions set out below to identify ~~and~~ how harm to biodiversity can be avoided, or failing that adequately mitigated ~~impact on biodiversity and geodiversity~~ where this is possible.'
Marion Williams	Environment Agency			DBDLP 1290	Policy ENV 8	Assessing a Developments Impact on Biodiversity	Neutral	Suggested revised wording final point – 'Where developers identify the presence of non-native invasive species on-site, measures will be required to contain the species and ensure it is effectively managed, or where possible, eradicated during development.'	Agree with suggested change to policy.	The final paragraph of Policy ENV 8 has been amended to read: 'Where developers identify the presence of non-native invasive species on-site, measures will be required to contain the species and ensure it is effectively ~~dealt with~~ managed, or where possible, eradicated during development.'

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP228	9.6.10	Paragraph	Object	The Council is prioritising short term growth ahead of longer term more sustainable proposals to mitigate flood risk, and safeguard and enhance biodiversity. Efforts to preserve and enhance biodiversity can add to the size of growth of the economy and peoples well-being. The Local Plan outputs should be more balanced between the economy and biodiversity. Stronger biodiversity outputs should include no net losses but instead net gains. Examples should include housing/employment proposals being sympathetic to the existing wildlife and their habitat and promote its longevity. Nest boxes, hedgehog highways, fruit trees in gardens, nectar-rich planting for our pollinators and even wall cavities for bats and starlings. Further measures include increasing the size of green infrastructure buffer zones surrounding new developments and new roads to 100m on all sides. Red Hall Nature Reserve and the new road is a good example of this. Ingenium Parc is being developed along these lines and if this continues this will be another good example of Green Infrastructure working. The financial contribution from each development and business rate levy for employment sites could be used to fund ongoing management and maintenance of	The Local Plan provides a long term 20 year plan for the Boroughs growth and development. The Council has adopted a balanced strategy to meeting its housing requirement through the allocation in the Draft Local Plan of 26 sites of which 14 sites are 150 dwellings or less, and a further 6 sites are under 500 dwellings. Furthermore, the sites are appropriately spread across urban extensions, the urban area and the Boroughs larger service villages. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. However, the policy wording in Policies ENV 7 and ENV 8 have been amended to strengthen this objective and better reflect the NPPF. The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referenced under several policies in the emerging Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								the nature reserve and the landscaped area surrounding each development / industrial unit.		
Mr David Phillips	Darlington Friends of the Earth			DBDLP229	9.6.11	Paragraph	Object	The Council is prioritising short term growth ahead of longer term more sustainable proposals to mitigate flood risk, and safeguard and enhance biodiversity. Efforts to preserve and enhance biodiversity can add to the size of growth of the economy and peoples well-being. The Local Plan outputs should be more balanced between the economy and biodiversity. Stronger biodiversity outputs should include no net losses but instead net gains. Examples should include housing/employment proposals being sympathetic to the existing wildlife and their habitat and promote its longevity. Nest boxes, hedgehog highways, fruit trees in gardens, nectar-rich planting for our pollinators and even wall cavities for bats and starlings. Further measures include increasing the size of green infrastructure buffer zones surrounding new developments and new roads to 100m on all sides. Red Hall Nature Reserve and the new road is a good example of this. Ingenium Parc is being developed along these lines and if this continues this will be another good example of Green Infrastructure working.	The Local Plan provides a long term 20 year plan for the Boroughs growth and development. The Council has adopted a balanced strategy to meeting its housing requirement through the allocation in the Draft Local Plan of 26 sites of which 14 sites are 150 dwellings or less, and a further 6 sites are under 500 dwellings. Furthermore, the sites are appropriately spread across urban extensions, the urban area and the Boroughs larger service villages. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). Policy ENV 7 seeks to deliver net gains for biodiversity as a result of development. However, the policy wording in Policies ENV 7 and ENV 8 has been amended to strengthen this objective and better reflect the NPPF. The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referenced under several policies in the emerging Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	The third paragraph of Policy ENV 7 has been amended to read: 'Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, ~~as a minimum to ensure no net loss of biodiversity or geodiversity. Development should enhance biodiversity in order to provide net gains where possible~~ by:' The final sentence of the second paragraph of Policy ENV 8 has been amended to read: 'This ensures the Council can fulfill its planning duties in relation to minimising impacts on and providing net gains for biodiversity ~~and geodiversity and ensure no net loss of the Borough's natural resourses~~.'

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								The financial contribution from each development and business rate levy for employment sites could be used to fund ongoing management and maintenance of the nature reserve and the landscaped area surrounding each development / industrial unit.		
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP700	10	TRANSPORT AND INFRASTRUCTURE	Neutral	Importance of encouraging walking and hierarchy of mode needs should be more prominent.	Additional emphasis on sustainable methods of transport provided in the chapter introduction. Otherwise the main policy and supporting text is already reflective of a transport hierarchy balanced in favour of walking and cycling, public transport then highways.	Change 10.0.1 to read: The majority of new residential, commercial and employment development is therefore guided to the main towns and larger villages **and sustainable methods of transport will be prioritised.**
Mr Christopher Bell	Highways England			DBDLP937	10	TRANSPORT AND INFRASTRUCTURE	Object	Highways England require further evidence in order for the plan to be found sound. A substantial number of proposed sites have been identified by this review that will potentially impact on the SRN, namely the A1 (M) and the A66 which surround the wider Darlington area. Additional evidence required: 1. Details should be supplied in relation to the size and location of any allocation of pitches for gypsies and travellers, in order to confirm that they will not have an impact on the SRN.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. Highways England will remain integral to this process and will be kept informed of progress.	To be covered in supporting evidence and Statement of Common Ground with Highways England.

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								2. Details of any additional sites to be considered. 3. Additional detail should be provided as to the probable impacts of the development traffic upon the SRN, and the capacity or viability of the SRN to cope with the scale of the proposed development. The traffic impact at the SRN of sites included will need to be considered further by DBC in association with Highways England. Although some discussion of this is made in the SA in Appendix G in relation to potential mitigatory measures for each site and developer contributions, this needs to be reflected in the LP. If highway mitigation measures are likely to be required as part of a development, the viability of such will also need to be considered. 4. An assessment of the cumulative traffic impact of all the Local Plan sites is required, alongside discussion surrounding any likely mitigation measures that would be required at key SRN junctions. Highways England's key concern remains		

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								the cumulative impact of traffic from all Plan sites upon the SRN and how this will be mitigated.		
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP1216	10	TRANSPORT AND INFRASTRUCTURE	Object	Separate Airport Policy requested to cover: • Airport role • Masterplan • Strategic Growth Area • Safety with specific references in the policy to circulars and zones to be on policies map.	It is not considered a standalone Airport Policy would offer significant benefits. Whilst the continued operation of the airport is supported by the council in planning terms there is little that can be done to secure this than isn't already factored into the suite of relevant policies within the plan. Airport safeguarding areas will be included on the policies map as opposed to an appendix.	Airport safeguarding areas will be included on the policies map.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP699	Policy IN 1	Delivering a Sustainable Transport Network	Object	Suggest formatting changes to policy. Concern over impacts of highway infrastructure.	Formatting to be reviewed across the document before publication. New highway infrastructure will need to be subject to more detailed environmental consideration in due course.	Review policies across the document for consistency of formatting.
Gordon Pybus	Darlington Association on Disability			DBDLP76	Policy IN 2	Improving Access and Accessibility	Object	Suggest changes to policy wording to be more inclusive of more disabilities. In singling out Dementia as a condition this could be to the detriment of other needs. Need for Equality Impact Appraisal before plan is adopted.	Balancing varying need across a plan always requires compromise. Dementia is of significant concern nationally over the next 20 years with an aging population profile so needs to be considered alongside other specific needs. An Equalities Impact Appraisal will be produced to consider potential impacts in detail.	Policy DC 2 to be reworded see comment DBDLP1411 for details.
Gillan Gibson	Campaign to Protect Rural England (CPRE) -			DBDLP702	Policy IN 2	Improving Access and Accessibility	Neutral	Criteria on provision/improvement of disabled access appears out of place.	It is assumed this comment is against IN2 d not IN3 as submitted. Seeking improvement to access buildings is considered a vital part of improving access and accessibility is considered an integral part of the plan. It is	Point d. to be moved to the top of the list and points renumbered appropriately.

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	Darlington Group								accepted that point d is perhaps a little out of place with the other points mainly relating to sustainable and public transport connectivity. This point will be moved to the top of the list as it then represents a logical hierarchy of building access then footpath access then public transport access and facilities.	
Mr Steven Drabik	Architectural Liaison Officer Durham Constabulary			DBDLP765	Policy IN 2	Improving Access and Accessibility	Neutral	Suggested inclusion of wording to ensure safe design principles for new footpaths and cycleways.	Policy can be reworded accordingly but the matter is also considered as part of the Design of New Development SPD.	b. All developments should provide ~~good~~ **safe** access to the borough wide cycling and walking network including links to the Public Rights of Way network and leisure routes. c. All new development should provide easy **and safe** access for those who wish to use public transport. Accessibility is based on 80% or more of the site being within 400m walking distance of a bus stop.
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP701	Policy IN 2	Improving Access and Accessibility	Neutral	Healthy New Towns Design principles should be incorporated.	This integration will be provided in the next stage of the plan.	Healthy new towns principles diagram to be incorporated into the plan.
Mr John Fleming	Gladman Developments			DBDLP1090	Policy IN 2	Improving Access and Accessibility	Object	Objection raised to the requirement for 80% of a development site being within 400m walking distance of a bus stop. It is suggested that 1 km would be more appropriate as suggested in IHT guidance 'Guidelines for Providing Journeys on Foot'. The policy should also recognise the fact that new development proposals will often improve	The 400m walking distance from a bus stop is derived from the Department of Environment Circular 82/73 (DOE, 1973) which gives 400 metres as the recommended maximum walking distance along the footpath system, this represents a 5-minute walk at about 5 kph (roughly the average walking speed in the National Travel Survey). The Chartered Institution of Highways & Transportation (CIHT) in their most recent guidance 'Buses in Urban Developments' January 2018 (1) challenges the 400 meter criterion and	Policy IN 2 to be reworded to require 80% of major developments to be within 400m of a bus stop.

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								access to public transportation through financial agreement and design of a proposal to incorporate access to new bus stops and sustainable modes of transportation as part of the development proposal.	suggests a range of criteria between 500m and 250m in different locations would be more appropriate to acknowledge that a flexible approach is required in certain circumstances. As Darlington has a relatively compact main urban area and clearly defined larger villages it is not considered there is a clear need to go for a lower threshold for Town Centres etc. 400m remains towards the top end of the recommended scale of acceptable distances and there is flexibility within the policy as drafted that only 80% of a site has to be within a 400m radius of a bus stop. If developments cannot meet the requirement applicants are welcome to submit potential mitigation measures or explain any extenuating circumstances. (1) https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.p	
Paul Hunt	Persimmon Homes			DBDLP 1200	Policy IN 2	Improving Access and Accessibility	Object	c) of Policy IN 2 should be worded as such “All new developments should provide easy access for those who wish to use public transport. All new developments should aim for 80% of the site to be within 400m walking distance of a bus stop”	This point is to be reworded to read 'all new major development....' This will allow suitable flexibility for smaller developments.	Reword IN 2 (c): 'All new major development.....'
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1124	Policy IN 2	Improving Access and Accessibility	Object	Objection raised to the requirement for 80% of a development site being within 400m walking distance of a bus stop. it is considered this does not reflect development in rural areas and additional flexibility in wording should be considered.	The 400m walking distance from a bus stop is derived from the Department of Environment Circular 82/73 (DOE, 1973) which gives 400 metres as the recommended maximum walking distance along the footpath system, this represents a 5-minute walk at about 5 kph (roughly the average walking speed in the National Travel Survey).	Policy IN 2 to be reworded to require 80% of major developments to be within 400m of a bus stop.

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									The Chartered Institution of Highways & Transportation (CIHT) in their most recent guidance 'Buses in Urban Developments' January 2018 (1) challenges the 400 meter criterion and suggests a range of criteria between 500m and 250m in different locations would be more appropriate to acknowledge that a flexible approach is required in certain circumstances. As Darlington has a relatively compact main urban area and clearly defined larger villages it is not considered there is a clear need to go for a lower threshold for Town Centres etc. 400m remains towards the top end of the recommended scale of acceptable distances and there is flexibility within the policy as drafted that only 80% of a site has to be within a 400m radius of a bus stop. If developments cannot meet the requirement applicants are welcome to submit potential mitigation measures or explain any extenuating circumstances. (1) https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf	
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP1244	Policy IN 2	Improving Access and Accessibility	Object	Objection raised to the requirement for 80% of a development site being within 400m walking distance of a bus stop. It is suggested that 1 km would be more appropriate as suggested in IHT guidance 'Guidelines for Providing Journeys on Foot'.	The 400m walking distance from a bus stop is derived from the Department of Environment Circular 82/73 (DOE, 1973) which gives 400 metres as the recommended maximum walking distance along the footpath system, this represents a 5-minute walk at about 5 kph (roughly the average walking speed in the National Travel Survey). The Chartered Institution of Highways & Transportation (CIHT) in their most recent guidance 'Buses in Urban Developments' January 2018 (1)	Policy IN 2 to be reworded to require 80% of major developments to be within 400m of a bus stop.

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									challenges the 400 meter criterion and suggests a range of criteria between 500m and 250m in different locations would be more appropriate to acknowledge that a flexible approach is required in certain circumstances. As Darlington has a relatively compact main urban area and clearly defined larger villages it is not considered there is a clear need to go for a lower threshold for Town Centres etc. 400m remains towards the top end of the recommended scale of acceptable distances and there is flexibility within the policy as drafted that only 80% of a site has to be within a 400m radius of a bus stop. If developments cannot meet the requirement applicants are welcome to submit potential mitigation measures or explain any extenuating circumstances. (1) https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf	
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1320	Policy IN 2	Improving Access and Accessibility	Object	Objection raised that policy lacks flexibility. Specifically objection is raised to the requirement for 80% of a development site being within 400m walking distance of a bus stop. The Institute of Highways and Transportation issued guidance for 'Providing for Journeys on Foot' in 2000. Table 3.2 of that document defines 'suggested acceptable walking distances', defining 400m as 'desirable', but also considering 'acceptable' and the 'preferred maximum' to be 800m and 1,200m respectively.	The 400m walking distance from a bus stop is derived from the Department of Environment Circular 82/73 (DOE, 1973) which gives 400 metres as the recommended maximum walking distance along the footpath system, this represents a 5-minute walk at about 5 kph (roughly the average walking speed in the National Travel Survey). The Chartered Institution of Highways & Transportation (CIHT) in their most recent guidance 'Buses in Urban Developments' January 2018 (1) challenges the 400 meter criterion and suggests a range of criteria between 500m and 250m in different locations would be more appropriate to	Policy IN 2 to be reworded to require 80% of major developments to be within 400m of a bus stop.

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									acknowledge that a flexible approach is required in certain circumstances. As Darlington has a relatively compact main urban area and clearly defined larger villages it is not considered there is a clear need to go for a lower threshold for Town Centres etc. 400m remains towards the top end of the recommended scale of acceptable distances and there is flexibility within the policy as drafted that only 80% of a site has to be within a 400m radius of a bus stop. If developments cannot meet the requirement applicants are welcome to submit potential mitigation measures or explain any extenuating circumstances. (1) https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.p	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP704	Policy IN 3	Transport Assessments and Travel Plans	Neutral	Confusion over wording of point c) relating to the statement 'contribute positively to congestion'.	Alternative wording recommended.	c. contribute positively to **managing** congestion, environmental and safety issues including ~~managing~~ car parking provision.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP705	Policy IN 4	Parking Provision including Electric Vehicle Charging	Neutral	Stronger policy wording suggested to require 'at least' one double charging point per 50 spaces.	Alternative wording to be included.	Wording to be changed to: 'For each additional 50 parking spaces at least one double charging point should be provided.'
Gillan Gibson	Campaign to Protect Rural England (CPRE) -			DBDLP706	10.4.4	Paragraph	Object	Objection is raised that the wording implies surface parking outside of the ring road will be protected solely for parking which	It is not the intention to restrict Town Centre Fringe regeneration so alternative wording is proposed.	Wording to be changed to: 'Outside of the ring road existing parking provision will generally be protected for long stay parking and

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	Darlington Group							will restrict wider regeneration opportunities.		Residents Parking Zones, unless part of a wider regeneration scheme'.
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1207	Policy IN 5	Airport Safety	Object	Broadly support the policy but wish to see the safeguarding zones included on the policies map. Policy should also be reworded to include reference to specific circulars.	Safeguards can be included on the policies map and reference to circulars included in policy as opposed to the reasoned justification.	Revised Policy IN 5 Wording: ***Within the established 13km (bird strike hazard area) and the 15km (radius of critical airspace) safeguarding areas surrounding the airport, as identified on the policies map, relevant development proposals will require consultation with the operator of the airport, and must consider the operational integrity of the airport, its surveillance systems, and the safety of air traffic services, in accordance with Government Circular 1/2003, or any successor guidance.*** ***Within the Public Safety Zones adjacent to the airport runway, as identified on the policies map, there is a general presumption against new development, unless the proposal accords with guidance in Government circular 1/2010 or any successor guidance.***
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1215	Policy IN 5	Airport Safety	Object	Wish to see DTVA specific policy as detailed in comment DBDLP1216. Separate Airport Policy requested to cover: • Airport role • Masterplan • Strategic Growth Area • Safety with specific references in the policy to circulars and zones to be on policies map.	It is not considered a standalone Airport Policy would offer significant benefits. Whilst the continued operation of the airport is supported by the council in planning terms there is little that can be done to secure this than isn't already factored into the suite of relevant policies within the plan. Airport safeguarding areas will be included on the policies map as opposed to an appendix.	Airport safeguarding areas will be included on the policies map.
Gillan Gibson	Campaign to Protect Rural England (CPRE) -			DBDLP 710	Policy IN 7	Telecommunication Masts	Object	Suggested minor amendment to wording to read 'It is not harmful.....'	This is a typo that will be rectified.	Change wording to e. 'It is not harmful.....'

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	Darlington Group									
Dr Ellen Bekker	Lead Adviser Natural England			DBDLP 302	Policy IN 9	Renewable and Energy Efficient Infrastructure	Object	Objection noted from statutory consultee. Advising that the policy should incorporate consideration of potential impact of renewable energy schemes on biodiversity and landscape (including cumulative impacts).	Agree this could be made a more prominent consideration of this policy although impact on biodiversity and landscaping are considered in separate policies.	*Policy IN9 suggested rewording:* *Renewable and low carbon energy development in appropriate locations will be supported. In determining planning applications for such projects significant weight will be given to the achievement of wider social, environmental and economic benefits.* *a. Wind energy development will be granted planning permission if the applicant can demonstrate that the proposal will not have unacceptable impact, either individually or cumulatively upon:* *i. shadow flicker;* *ii. visual dominance;* *iii. protected species and habitats;* *iv. landscape character and fabric;* *v. heritage assets;* *vi. communication links; and* *vii. aviation and radar.* *b. Solar Power developments will be granted planning permission if the applicant can demonstrate that the following considerations have be taken into account:* *i. the importance of siting systems in situations where they can collect the most energy from the sun;* *ii. need for sufficient area of solar modules to produce the required energy output from the system;* *iii. the colour and appearance of the modules;* *iv. demonstrate effective use of land by focussing large scale solar farms on previously developed and non agricultural land;*

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										v. where a proposal involves agricultural land it has been demonstrated that: *1. the land has been shown to be poorer quality land in preference to higher quality agricultural land; and* *2. the proposal allows for continued agricultural use where applicable and/or encourages* *biodiversity improvements around solar arrays;* *vi. the proposal has adequately mitigated the visual impact on the landscape and the effect of glint and glare on neighbouring uses and aircraft safety.* *c. Hydro Power: Applications for hydropower should be accompanied by a detailed Flood Risk* *Assessment. Early engagement should take place with the local planning authority and the Environment Agency.* *d. District Heating: Required in major development over 300 houses to be enabled for district energy connection unless demonstrated not to be feasible or financially viable to do so.* *Where relevant, planning applications will also need to include a satisfactory scheme to restore the site to a quality of at least its original condition once operations have ceased.*
Mrs Rachel Allum	Senior Development Planner Banks Group			DBDLP443	Policy IN 9	Renewable and Energy Efficient Infrastructure	Object	Proposing the inclusion of an onshore wind generation policy. Suggested two Test criteria approach and model wording for policy. test 1) No map for suitability produced in Draft Local Plan and methodology important	Policy for onshore wind more suitable at Tees Valley level and should be looked at within the Tees Valley Infrastructure Plan 2019. Scope for Wind turbine parks currently only the West of the Borough but will have impact if planned on Large Turbine scale (plus 125m) as suggested. Criteria based issue to be included to demonstrate development will not have	See IN 9 Rewording for Comment DBDLP302

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								test 2) Backing of local Community is open to interpretation Additional Test 3: Criteria based where it can be demonstrated that proposed development will not have unacceptable adverse impacts, individually or cumulatively to: 1. residential amenity as a result of noise, shadow flicker, visual dominance; 2. protected species or habitats; 3. landscape character and fabric; 4. heritage assets; 5. communication links; and 6. aviation and radar.	adverse impacts individually and or cumulatively. Onus will be put on the applicant to evidence.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 713	Policy IN 9	Renewable and Energy Efficient Infrastructure	Support	General support for policy IN9. Solar panels should be encouraged on industrial buildings. Minor changes to referencing suggested.	Solar panels will be encouraged on industrial units under draft Policy DC 1. It would not be appropriate to impose additional requirements.	Across the plan we need consistency in numbering and referencing.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 714	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Seeking clarity of formatting of policies (use of bullet points not recommended). Paragraph in section on 'Protection of Existing Community Facilities' appears out of place. The 'Locational Strategy' should have a cross reference.	Bullet points have been used in certain circumstances so as to not indicate a priority order. It is acknowledged this may make referencing less precise. It may be and a,b,c, would be more beneficial. Agree that paragraph on 'Protection of Existing Community Facilities' does appear out of place and this will be rectified.	Numbering has been reviewed. Rename subsection 'Provision and protection of Community Facilities'

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								Clarification sought as to why affordable housing schemes are exempt from education contributions.	Cross reference to 'Locational Strategy' not required as plan should be read as a whole. DfE guidance issued in November 2019 states it is up to individual authorities to set an approach for seeking contributions from affordable housing.	
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP848	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	General support for policy as drafted but seeking additional exemptions to apply to one bedroom dwellings, one and two bedroom apartments and student accommodation.	Exceptions will be revisited. Student accommodation is a logical addition as are one bed properties but two bedroom apartments could be capable of providing family accommodation. This approach would be supported by the pupil yield factor being calculated on any new property of two or more bedrooms.	Exception to be made for one bedroom properties and Student accommodation (unless it specifically includes provision for families).
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP44	12	GLOSSARY	Object	There should be a definition of 'infill development' which should include the filling of gaps and the rounding off of villages.	Comments noted. A definition for infill development will be added to the glossary. It is however considered that the rounding off of villages does not fall under the definition.	Text below to be added to the glossary: Infill development - The development of a small area of vacant land between existing buildings.
Nick McLellan	Story Homes			DBDLP1045	APPENDIX A	HOUSING TRAJECTORY	Object	Comments relate to site 99 Maxgate Farm, MSG. Story Homes advise the Council of development timescales. First completions are anticipated to be delivered in the second quarter of 2020 and thereafter. The site can also accommodate a total yield of 260 units following the removal of the proposed school site (as outlined in comments related to H 2 Housing Allocations ref DBDLP1044). The housing trajectory should be updated accordingly.	Comments noted. Update yield accordingly. The anticipated rates of delivery in the housing trajectory are an estimate and are based on the most up to date information available. The trajectory does not restrict sites from coming forward sooner or delivering at a faster rate. As outline permission, s106 legal agreement and reserved matters approval are still required it is considered appropriate to leave the start date for this site later on in the trajectory.	Update table 6.3, appendix A and appendix B with new yield.
Paul Hunt	Persimmon Homes			DBDLP1382	APPENDIX A	HOUSING TRAJECTORY	Neutral	Comment also recorded against Site 8 - Berrymede Farm (DBDLP1185)	Comments noted. As there will be a minimum of 2 volume house builders on site it is agreed that the delivery rate in the trajectory can be increased to 60 dwellings per annum.	Increase delivery rate for site 8 Berrymead Farm to 60 dwellings per annum in Appendix A Housing Trajectory.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								Support for the inclusion of Site 8 - Berrymead Farm however wish to see trajectory altered to indicate a more rapid rate of delivery. Start date is considered appropriate given necessity to secure reserved matters approval and associated lead in times. The site is jointly owned by Persimmon Homes, Taylor Wimpey and Northumbrian Land Ltd and as such will be constructed simultaneously by a minimum of 2 volume house builders across multiple sales outlets. As such we anticipate that the scheme will deliver 60 dwellings per annum and accordingly will be completed by 2026. The trajectory should be amended to reflect the above anticipated build out rates.		
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1312	APPENDIX A	HOUSING TRAJECTORY	Object	Part of wider response logged against Policy H 2. Delivery rate is considered too ambitious due to no indication of a planning application or known developer backing. There is a discrepancy in figures between the trajectory at Appendix A and Policy H 2 for site 249 Coniscliffe Park, North.	Comments noted. Agreed to move site 249 back in the trajectory. Figures to be updated accordingly in policy H 2 and discrepancy rectified. Figures will also be updated in the housing allocation statement.	Agreed to move site 249 back in the trajectory. Figures to be updated accordingly in Appendix A Housing Trajectory, housing allocation statement and policy H 2 and discrepancy rectified.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1314	APPENDIX A	HOUSING TRAJECTORY	Object	Part of wider response logged against Policy H2. Discrepancy on the yield to be delivered over the plan period between Appendix A Housing Trajectory and policy H 2 Housing Allocations, for site 41 South Coniscliffe Park.	Comments noted. Discrepancy to be rectified.	Policy H 2 Housing Allocations to be amended to show correct yield during plan period for site 41 South Coniscliffe Park.

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Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP1385	APPENDIX A	HOUSING TRAJECTORY	Object	Extract of comment DBDLP1233. Comments that site 41 South Coniscliffe Park is anticipated to deliver first completions in 2020 and a rate of 42 dwellings per annum. Requested that Appendix A Housing Trajectory is updated to reflect this. Site will be completed we within plan period. Drafting error in table 6.3 with regards to site yield, suggesting a total of 590 dwellings rather than 535 in line with the pending planning application.	Comments noted. The anticipated rates of delivery in the housing trajectory are an estimate and are based on the most up to date information available. The trajectory does not restrict sites from coming forward sooner or delivering at a faster rate. As outline permission, s106 legal agreement and reserved matters approval are still required it is considered appropriate to leave the start date for this site later on in the trajectory. A standard delivery rate of 30 dwellings per annum has been applied to the site. No evidence has been provided to support an increased figure. As such no change is proposed. Discrepancy in site yield is to be amended in policy H 2 Housing Allocations.	Yield discrepancy for site 41 South Coniscliffe Park is to be amended in policy H 2 Housing Allocations.
Paul Hunt	Persimmon Homes			DBDLP1185		Site 8 - Berrymead Farm	Neutral	Duplicate comment recorded against Appendix A Housing Trajectory. Support for the inclusion of Site 8 - Berrymead Farm however wish to see trajectory altered to indicate a more rapid rate of delivery. Start date is considered appropriate given necessity to secure reserved matters approval and associated lead in times. The site is jointly owned by Persimmon Homes, Taylor Wimpey and Northumbrian Land Ltd and as such will be constructed simultaneously by a minimum of 2 volume house builders across multiple sales outlets. As such we anticipate that the scheme will deliver 60 dwellings per annum and accordingly will be completed by 2026. The trajectory should be	Comments noted. As there will be a minimum of 2 volume house builders on site it is agreed that the delivery rate in the trajectory can be increased to 60 dwellings per annum.	Increase delivery rate for site 8 Berrymead Farm to 60 dwellings per annum in Appendix A Housing Trajectory.

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								amended to reflect the above anticipated build out rates.		
Ms Emily Hrycan	Historic England			DBDLP 1104		Site 20 - Great Burdon	Object	Potential harm to Haughton Conservation and the Scheduled WWII Bombing Decoy should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified as part of this work have been included within the policy and/or supporting text.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the policy and/or supporting text.
-Anne Carrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1027		Site 41 - South Coniscliffe Park	Object	Low Coniscliffe and Merrybent Parish Council consider there is no justification for the site. It is not considered a suitable location and will be physically detached by Baydale Beck from the existing urban area. It is considered that a site of this size should have a policy of its own similar to Skerningham and Greater Faverdale.	The need for sites are discussed in greater detail in officer response on housing requirement and standard method and response on brownfield sites, urban sprawl and empty homes. The site allocation statement for this site and 249 (Coniscliffe Park North) will be amended to highlight the necessity to provide convenient and safe pedestrian/cycle connections into the existing urban area crossing Baydale Beck.	Additional criteria to be added to the allocation statement for this site and site 249 (Coniscliffe Park North). J. The development will provide convenient and safe pedestrian and cycle connections into the existing urban area crossing Baydale Beck.
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1233		Site 41 - South Coniscliffe Park	Support	Supported for the proposed allocation is reiterated on the following grounds: • Would supply high quality housing. • Accessible location. • Create construction jobs. • Support local services.	Support is noted for the promoted site and additional detailed consideration and assessment will take place throughout the planning process. WWTW reference to be incorporated. Trajectory modifications considered in comments on Appendix A. (See Comment Ref DBDLP1385)	Change 'Sewage Works' to 'Waste Water Treatment Works'

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								• Support the provision of a link road between. • Deliver publicly accessible open space • other wider environmental benefits are also described. Seeking change of reference to Sewage Works to be replaced with Waste Water Treatment Works. Trajectory modifications are also suggested.		
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1028		Site 249 - Coniscliffe Park, North	Object	Low Coniscliffe and Merrybent Parish Council consider there is no justification for the site. It is not considered a suitable location and will be physically detached by Baydale Beck from the existing urban area. It is considered that a site of this size should have a policy of its own similar to Skerningham and Greater Faverdale.	The need for sites are discussed in greater detail in the officer response on housing requirement and standard method and the response on brownfield sites, urban sprawl and empty homes. The site allocation statement for this site and 41 (South Coniscliffe Park) will be amended to highlight the necessity to provide convenient and safe pedestrian/cycle connections into the existing urban area crossing Baydale Beck.	Additional criteria to be added to the allocation statement for this site and site 41 (South Coniscliffe Park). J. The development will provide convenient and safe pedestrian and cycle connections into the existing urban area crossing Baydale Beck.
Ms Laura Gardner				DBDLP 955		Site 392 - Elm Tree Farm	Object	The additional traffic along Sparrow Hall Drive and Whinfield Road will cause congestion, pollution, noise and affect road safety. Development of this site will have an adverse impact on the local environment and landscape, resulting in the loss of local wildlife and recreational opportunities. This will have an	Transport modelling work has been undertaken to test highway mitigation schemes and ensure developments do not have an unacceptable impact on local and strategic highway network. Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.

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								impact on resident's health and wellbeing. Development will put a strain on the town's already overstretched roads and local services (including doctors and schools). Development will devalue property in the area. Dispute the need for this many homes. The town centre is diminishing. Priority should be given to the development of brownfield land and use of empty properties.		
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1172		Site 392 - Elm Tree Farm	Object	Support for promoted site. Requesting some changes to housing statements: • Farm buildings not special enough to justify retention. • The reference to 'historic track' may be misleading as it is the existing golf club access. • Reference to 'high landscape value' as this is not an identified designation. It is acknowledged that the landscape is attractive.	Support for the proposed allocation noted. Although the farm buildings hold no statutory protection it is good planning practice to retain and convert old buildings where appropriate. If there are structural or layout reasons why the buildings cannot be retained, this should be justified when a planning application is submitted. The historic track is the route along Green Lane, not the access to the golf club. This will be clarified with additional text in the statement. The statement outlines that the site is within an area of high landscape sensitivity, not high landscape value. It is considered appropriate to retain this wording.	Amend criteria c of housing allocation statement 392 Elm Tree Farm as below: ~~A~~ The Green Lane historic track ~~crosses~~runs adjacent to the site. This should be protected and accommodated in an appropriate site layout.

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Mrs Veronica Harland				DBDLP659		Site 392 - Elm Tree Farm	Object	Objection is raised on the following grounds: • There is no need for 142 houses on the site. • Development will lead to an increase in traffic congestion, pollution and concerns over highway safety. Particular concerns are raised in relation to parked cars on Sparrowhall Drive Causing an obstruction and that Barmpton Lane is not wide enough to accommodate buses. • Concern is raised about accessing particular properties (This information is thought to be part of the developers pre-application consultation as it does not form part of the local plan). • The development plus the relocation of the golf course will lead to a significant increase in traffic and pollution. • Clarification is sought as to where the new green space will be created. • Developing vacant brownfield sites should be prioritised and there are a significant number of empty homes which should be brought back into use.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Comment is noted regarding parking however this is not a matter for the local plan and restrictions and be implemented by the Highway Authority if they see fit. Should access be provided across Springfield Park it would be engineered to a standard to function as one of the primary access points to the Skerningham development. Further details of exact specifications will be developed as the scheme progresses. Consideration of Elm Tree Farm in previous plans and applications, a significant amount of time ago, has little relevance with wholesale changes to national planning policy having taken place since.	See officer response paper on Skerningham comments.

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								• Concern that creating an access point over Springfield Park will create a 'Rat Run'. • Elm Tree Farm was refused planning permission in 1997 for 75 dwellings.		
Mr Christopher Bell	Highways England			DBDLP911		Site 1 - Alderman Leach	Neutral	Highways England raises no concern with this site.	Advanced discussions have been held with a developer for Site 1 Alderman Leach however the yield proposed for the site has reduced to below 10 dwellings. This site is therefore to be removed from the proposed allocations.	Remove site 1 Alderman Leach from policy H 2, Appendix A and Appendix B.
Michael Wilson				DBDLP324		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds that the description of 'open space disused golf course' is misleading and development would be in conflict with the Archeo Environment Statement of Significance.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
MR MICHAEL GREEN				DBDLP238		Site 9 - Blackwell Grange East	Object	Objection on the grounds of: • loss of historic parkland, • potential for archaeology • conflict with the Archeo Environment Statement of Significance, • loss of recreation • loss of trees,	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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								• sensitivity of 'memorial trees' and areas used to scatter ashes.		
MR MICHAEL GREEN				DBDLP261		Site 9 - Blackwell Grange East	Object	Objection raised in relation to: • sensitivity and ethical responsibility for 'memorial trees' and areas used to scatter ashes, • impact on ecology and in particular newts.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Sophie [illegible]ard				DBDLP269		Site 9 - Blackwell Grange East	Object	Objection on the grounds of: • further loss of greenspace, • loss of trees, • impact on habitats, • increased traffic congestion.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Sarah Railton				DBDLP271		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Dr Ranajit Chatterjee				DBDLP273		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of impact upon a key green corridor into Darlington and a perceived lack of need for 'high end' properties.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Barry Appleby				DBDLP287		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of parkland/green space and impact on wildlife habitat.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised

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									site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	site 403. A plan of this change is available in Appendix 2b.
Catherine Appleby				DBDLP288		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of parkland/green space and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Gillian Rickaby				DBDLP289		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of: • loss of parkland, • impact on heritage, • loss of trees and wildlife habitat, • loss of recreation space, • lack of need for 'high end' housing.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Samantha Rickaby				DBDLP295		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of: • loss of 'green belt', • character of the West End would be altered, • loss of greenery would result in more pollution, • increase in traffic, • no need for executive homes, • wildlife habitats have already been destroyed on the western side of Blackwell.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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Mrs A Dimelow				DBDLP 428		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and increase in traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Paul Hunter				DBDLP 431		Site 9 - Blackwell Grange East	Object	Objection raised on grounds of loss of trees, wildlife habitat and parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Paul Harris				DBDLP 432		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Susan Taylor				DBDLP 435		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of loss of green space and trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mrs Ruth Harmer				DBDLP 441		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland. Inconsistency with draft Policies ENV 1 and ENV 3 and need for executive/'high end' housing also questioned.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Carl Watson				DBDLP 446		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Richard Hurst				DBDLP 455		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of impact on a key gateway into Darlington.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised

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									revised site 403. A plan of this change is available in Appendix 2b.	site 403. A plan of this change is available in Appendix 2b.
Frank Peacock				DBDLP 458		Site 9 - Blackwell Grange East	Object	Parkland should be a protected local green space.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Carole Sobkowiak				DBDLP 467		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of impact on a key green gateway to Darlington, impact on Listed Buildings and loss of trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
T Copping				DBDLP 471		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of perceived loss of 'green belt'.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Moira Bradey				DBDLP 473		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of trees. Particular concern raised over 'memorial trees'.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Zoe Coltman				DBDLP 476		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Patricia Harris				DBDLP 478		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Christopher Green				DBDLP 489		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of parkland and trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised

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									site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	site 403. A plan of this change is available in Appendix 2b.
Dr Elizabeth Elliott				DBDLP 490		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and trees and associated impact on health and wellbeing.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mrs J Shearn				DBDLP 494		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and trees. Statement requested about replacement of trees on site currently being developed but this is no longer a local plan matter so has not been included in comments.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
aul utchinson				DBDLP 495		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of loss of trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Barry Holland				DBDLP 496		Site 9 - Blackwell Grange East	Object	Objection is raised to the principle of housing development on the site 9.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Kevin Winkworth				DBDLP 497		Site 9 - Blackwell Grange East	Object	Objection on the grounds of loss of parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Audrey Peacock				DBDLP 502		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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Ty Hankinson				DBDLP504		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of green field sites when brown field should be the priority.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Brian Tudor				DBDLP513		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Lynn Halland				DBDLP518		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of impact on a key green gateway into Darlington.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Angela Gibson				DBDLP532		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Debbie				DBDLP538		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and green space.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Anna-Maria Thain				DBDLP540		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Christine Kent				DBDLP544		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and trees. It is also considered there is not	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised

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								enough information or sufficient time to allow thorough consultation.	site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	site 403. A plan of this change is available in Appendix 2b.
A H Berry				DBDLP 550		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds that development would conflict with the Archeo-Environment Statement of Significance.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
glenys drummond				DBDLP 454		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and a gateway feature to Darlington in the form of green avenues along Grange Road and Carmel Road.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
David Hailton	All Saints' Church, Blackwell			DBDLP 549		Site 9 - Blackwell Grange East	Object	Objection on the grounds of loss of parkland/greenspace and increased traffic also adding to existing problems caused by Blackwell Meadows.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Sue Turnbull				DBDLP 477		Site 9 - Blackwell Grange East	Object	Objection on the grounds of loss of parkland and trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Angela Green				DBDLP 566		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, impact on ecology (including Great Crested Newts) as well as concern over potential disturbance of 'memorial trees'.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Alison Boddy				DBDLP 570		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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Mr Peter Holt				DBDLP571		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and trees. It is important to keep this area attractive to live and invest.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Emma Easby				DBDLP591		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, impact on wildlife habitats and increase in traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
B Myers				DBDLP610		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of loss of greenspace and trees. The need for 'high end' housing is also questioned and development of brownfield sites would be preferable.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b and officer response on 'brownfield sites, urban sprawl and empty homes'.
Clare Hedley				DBDLP611		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Claire Chapman				DBDLP612		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
D Myers				DBDLP616		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of perceived loss of 'green belt', increase in traffic and that development of brownfield would be preferable.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b and officer response on 'brownfield sites, urban sprawl and empty homes'.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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Mrs Joanne Gilligan				DBDLP617		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of: • loss of green space for recreation • lack of need for 'high end' properties, • increased pressure on health services, • impact of additional traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Eleanor Rees				DBDLP622		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of loss of historic parkland, loss of trees and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
McCabe				DBDLP643		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of loss of historic parkland and impact of additional traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Moira Rickaby				DBDLP639		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Cally Howell				DBDLP648		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
D Skilbeck				DBDLP654		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of green space for recreation and dog walking.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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									revised site 403. A plan of this change is available in Appendix 2b.	
Clive Rickaby	Blackwell Action Group			DBDLP 746		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of: • loss of historic parkland, • loss of trees, • traffic noise has increased since the removal of trees on the opposite side of Carmel Road South, • inconsistency with Archeo-Environment Statement of Significance, • increased traffic and it's effect on congestion and air quality. Questions are also raised about the level of engagement with the community and the level of supporting evidence provided.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b. The level of engagement and evidence provided to support the plan will ultimately be tested by an independent inspector during the plan's examination in public.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Miss Clare Storey				DBDLP 764		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Stephen Scaife				DBDLP 715		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and potential loss of the site for recreational purposes.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Simon				DBDLP 743		Site 9 - Blackwell Grange East	Object	Objection raised on the following grounds:	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised

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Oxley								• The scope and impact of the proposed development has significantly extended from the original proposal. • Conflict with the recommendations of the Archeo Environment Statement of Significance. • Grade II* Listed Perimeter Wall under threat • Scoring system used to select the parklands for development is flawed. • Future opportunities exist to reintegrate the Grange with its historic parkland.	revised site 403. A plan of this change is available in Appendix 2b.	site 403. A plan of this change is available in Appendix 2b.
Mrs Janice Oxley				DBDLP 747		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Adam Mather				DBDLP 755		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds of: lack of need for housing, housing should not outweigh the harm it causes, loss of parkland for recreation, loss of tranquility,	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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								brownfield sites would be more preferable to greenfield.		
Mr David Newsome				DBDLP761		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and potential impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mrs Janet Bradshaw				DBDLP763		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and potential harm to wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr David Ridley				DBDLP766		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Ray Sims				DBDLP773		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and impact of increased traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Helen Sims				DBDLP774		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and impact of increased traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Helen Lawton				DBDLP638		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees, impact of increased traffic on pollution. Development of the site would also have a negative impact on peoples health and wellbeing.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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Ms Janet Land				DBDLP621		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of: • loss of green space, • lack of housing need, • potential impact on public rights of way, • loss of trees, • potential impact on wildlife habitats, • perceived financial gain.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b and 'Housing Requirement & Standard Method'	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Rebecca Erwin				DBDLP620		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees which in turn could exacerbate flooding and potential impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Margaret Holiday				DBDLP813		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
J Shearn				DBDLP866		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and potential impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mrs J Thorns				DBDLP867		Site 9 - Blackwell Grange East	Object	Objection on the grounds of lack of need for 'high end' housing.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b. The housing allocation statement for the site does not specify that the	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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									allocation should be for executive style housing. However, given the context of the surrounding area a low density scheme would be more appropriate and this has therefore been reflected in the site yield.	
Mr Christopher Bell	Highways England			DBDLP912		Site 9 - Blackwell Grange East	Object	'Possible concern' on the basis of impact on the strategic road network despite limited scale of development proposed. Particular impacts on A66 a concern owing to close proximity.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Joanne Ashwood				DBDLP939		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland and inconsistency with Archeo-Environment Statement of Significance.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mrs Karen Storey				DBDLP943		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, impact on wildlife habitats and lack of housing need.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b. and 'Housing Requirement & Standard Method'	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Matthew Davidson-Hall				DBDLP970		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees and impact of increased traffic. It is considered there are better sites available within the borough.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Bill Burrows				DBDLP999		Site 9 - Blackwell Grange East	Object	Objection is raised on the grounds o loss of open space, potential impact on listed buildings, loss of trees and that the development density appears too high.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

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Ms Claire Urwin				DBDLP 1002		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees which in turn could exacerbate flooding and potential impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Mr Phil Urwin				DBDLP 1005		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees which in turn could exacerbate flooding and potential impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Miss Poppy				DBDLP 1007		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees which in turn could exacerbate flooding and potential impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
[illegible] esbitt				DBDLP 1008		Site 9 - Blackwell Grange East	Object	Objection on the grounds of loss of green space.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Irma Hillary				DBDLP 1009		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of historic parkland, loss of trees, potential impact on wildlife habitats and there is not considered to be a need for executive/'high end' housing.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Michael Hedley				DBDLP 1030		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of open space and trees.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
L Beadle				DBDLP 1034		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of green space and impact from increased traffic.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
P Nesbitt				DBDLP 1038		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of green space.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Redacted				DBDLP 1040		Site 9 - Blackwell Grange East	Object	Objection raised on the following grounds: there is insufficient existing parking for South Park, loss of trees has already harmed a key green gateway, loss of green space, opportunity to create more accessible car parking for the park, Blackwell could be a tourism asset, Blackwell has a lack of facilities or a defined centre,lower speed limits should be in place on the A66. In summary reduce the number of houses on the site and enhance the offer of the parkland.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b. Highways England are responsible for the operation of the A66 and if speed limits need to be lowered for safety reasons they have the power to impose necessary changes. It is the intention for the parkland to be restored and have improved public access.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Emily Hrycan	Historic England			DBDLP 1113		Site 9 - Blackwell Grange East	Object	Potential harm to Grade II* listed Blackwell Grange Hotel, some Grade II assets and the South Park registered Park and Garden and the West End Conservation Area should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate	The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
								mitigation measures to minimise harm.	identified as part of this work have been included within the policy and/or supporting text. In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	
George Davidson-Hall				DBDLP 1274		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of trees and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Samuel Davidson-Hall				DBDLP 1277		Site 9 - Blackwell Grange East	Object	Objection raised on the grounds of loss of trees and impact on wildlife habitats.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.	In response to representations that highlighted the sensitivity of Site 009 relative to the land to the south of the site, it is proposed to be replaced with revised site 403. A plan of this change is available in Appendix 2b.
Ms Emily Hrycan	Historic England			DBDLP 1116		Site 11 - Cattle Mart	Object	Potential harm to Grade II* listed Bank Top Station should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified as part of this work have been included within the policy and/or supporting text.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the policy and/or supporting text.
Ms Emily	Historic England			DBDLP 1139		Site 95 - Beech Crescent	Object	Potential harm to Heighington Conservation Area and it's various heritage assets should be given greater consideration to	The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the policy and/or supporting text.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
Hrycan						East, Heighington		provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified as part of this work have been included within the policy and/or supporting text.	
Mr A Macnab	Middleton St George Parish Council			DBDLP819		Site 375 - South of High Stell, MSG	Object	Objection raised to Site 375 on the grounds that it will lead to increased traffic congestion and create a safety hazard.	An initial assessment by the Council's Highway Engineer has raised issues with vehicle accessibility to this site. As such it has been decided to remove the proposed allocation from the Local Plan. However, the site is a logical extension to the village and therefore the site will remain within the proposed development limits of the village. As such, if access issues can be resolved in the future the site can be brought forward for development.	Remove site 375 South of High Stell from policy H 2, Appendix A Housing Trajectory, Appendix B Housing Allocation Statements and policies maps.
Mr Christopher Bell	Highways England			DBDLP924		Site 375 - South of High Stell, MSG	Object	Site of possible concern to Highways England with potential impact on the A66.	An initial assessment by the Council's Highway Engineer has raised issues with vehicle accessibility to this site. As such it has been decided to remove the proposed allocation from the Local Plan. However, the site is a logical extension to the village and therefore the site will remain within the proposed development limits of the village. As such, if access issues can be resolved in the future the site can be brought forward for development. The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an	Remove site 375 South of High Stell from policy H 2, Appendix A Housing Trajectory, Appendix B Housing Allocation Statements and policies maps.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change Recommended
									unacceptable impact on local and strategic highway network.	
Mr John Fleming	Gladman Developments			DBDLP 1093		Site 375 - South of High Stell, MSG	Neutral	Support for inclusion of promoted site however consider the quantum of development proposed at the site should be greater than the 100 units in the draft plan. It is also requested that the Housing Allocation Statement be amended to be less prescriptive about access arrangements.	An initial assessment by the Council's Highway Engineer has raised issues with vehicle accessibility to this site. As such it has been decided to remove the proposed allocation from the Local Plan. However, the site is a logical extension to the village and therefore the site will remain within the proposed development limits of the village. As such, if access issues can be resolved in the future the site can be brought forward for development.	Remove site 375 South of High Stell from policy H 2, Appendix A Housing Trajectory, Appendix B Housing Allocation Statements and policies maps.

Officer Response Papers and Key Amendments APPENDIX 2

a) HOUSING CHAPTER: SUMMARY OF MAIN ISSUES AND RESPONSES

b) BLACKWELL GRANGE EAST REVISED SITE PLAN

c) POLICY H 10: SKERNINGHAM STRATEGIC ALLOCATION - SUMMARY OF MAIN ISSUES AND RESPONSES

d) HERITAGE POLICIES PAPER – RECOMMENDED CHANGES to POLICIES ENV 1 & ENV 2 IN RESPONSE TO COMMENTS MADE BY HISTORIC ENGLAND

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APPENDIX 2a

HOUSING CHAPTER: SUMMARY OF MAIN ISSUES AND RESPONSES

Please note: Recommend changes outlined in this paper are in response to the main issues raised during the consultation on the Draft Local Plan. Further changes have been recommended to the policy in relation to other individual comments, and are set out within the main Consultation Summary and Response table.

HOUSING REQUIREMENT AND STANDARD METHOD

The NPPF was re issued with a number of changes in July 2018, one of which was the introduction of the standard method for calculating housing need.

Paragraph 60 of the NPPF (now 2019) states, "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."

The Council considers that there are exceptional circumstances to justify an alternative approach to the standard method figure of 177 dwellings per annum for Darlington; further detail of which is set out below. However the standard method figure has been issued by the Government as the minimum, starting point for authorities identifying their housing need.

The standard method uses the 2014-based household projections to establish a baseline of housing need. In February 2019 the Government outlined that the 2014-household projections should be used in the calculation rather than the 2016 projections. This was to provide stability for planning authorities and communities, to ensure that historic under-delivery and declining affordability are reflected and to be consistent with the Government's objective of significantly boosting the supply of homes.

For Darlington this data and the related population projections show low levels of growth and result in a local housing need figure of 177 dwellings per annum. The household and population projections for Darlington are however contradicted by comparative administrative data (NHS patient register, school census and records of those people receiving state pension) published by the Office for National Statistics which show significantly higher levels of growth. This data justifies the need for an adjustment to household growth projections / standard method figure as a baseline for calculating housing need.

The Council commissioned consultants (ORS), who specialise in demographic modelling, to carry out a more accurate projection of household growth across the plan period. This work factored in local data and long term migration trends (10 years) which give a clearer and more accurate picture of migration patterns. The impacts of Brexit on migration trends is currently unknown, but this can be considered in future Local Plan Reviews when more information is available. Consideration was also given to un-met need from concealed families, homeless households and those older people moving into residential institutions. This resulted in a housing need figure of 422 dwellings per annum.

The work undertaken by ORS did consider market signals which gives an indication of whether at that point in time supply was meeting demand in the housing market and if there is any un-met need from previous years. On the whole market signals did not indicate any need for an upward adjustment to the housing number. Changes in house prices, rents and affordability trends are typically in line with or better than the equivalent rates for England

and the comparator areas, while the rate of development has been higher than the England average.

The Local Plan makes an allowance for 7,000 (full time equivalent) jobs over the plan period. This figure comes from projecting the most recent trend on actual number of jobs created in the borough available from national statistics (BRES 2005 – 2015) forward by twenty years. This was considered to be the most realistic and appropriate estimation of jobs growth over the plan period. The demographic analysis carried out by ORS indicated that the economically active population would increase by 3,482 people over the plan period. This figure is much lower than the anticipated 7,000 jobs. Other factors considered included out commuting and in commuting of workers in the borough based on current trends. Overall, after taking account of these factors it was estimated that this would result in a shortfall of 1,808 workers. If all of the additional workers were to be met by increased migration to attract more workers to live in Darlington an additional 1,400 dwellings or 70 dwellings per annum would be required. This will result in an uplift and annual requirement of 492 dwellings per annum.

The jobs growth projection does not factor in impacts of Brexit or the contraction of the town centre. The likely effects of these two issues are very difficult to calculate but will be kept under review and can be considered further in future Local Plan reviews when more information on the impacts is available. A number of economic models do look at the likely economic impact of Brexit however for Darlington projections result in a significant decrease in jobs in Darlington. This is not something we can plan for as it doesn't support the Government's ambitions for growth which have to be accounted for in the local plan making process. This is also not an approach the Council would support. Additionally, given Darlington's recent economic successes including being the 7th fastest growing economy in the UK of 238 local authority areas in 2015 based on GVA, and on a range of positive indicators, we can make a valid case for why these projections are unreliable. Further detail on economic forecasts and jobs projection can be found in the Darlington Future Employment Needs Report September 2017 available on the Council's website https://microsites.darlington.gov.uk/local-plan/

In summary, the Council considers that there is sufficient evidence to set a housing target higher than the Government's standard method figure. The standard method is very much a minimum starting point for local authorities and is therefore proposed as the lower end of the requirement range. This has been recognised by all of the other Tees Valley authorities who are also planning for growth above this level. It is considered that the housing target within policy H 1 will meet the objectively assessed housing needs of the borough across the plan period. Full details on how the figure has been derived can be found in the Strategic Housing Market Assessment Update 2017 available on the Council's website https://microsites.darlington.gov.uk/local-plan/

The housing target in the plan will be assessed by an independent planning inspector, appointed by the Government, at a Local Plan examination. This will take place once the plan has been submitted to the planning inspectorate.

HOUSING REQUIREMENT AND HOUSING TARGET

The Council's approach to the above has been taken to provide a range for the housing requirement. This approach has been supported by decisions by planning inspectors. The wording of the policy is to be amended to ensure that this is clear.

The lower minimum housing requirement figure of 422 dwellings per annum, is considered to be the baseline need for the borough over the plan period. The higher housing target of 492 dwellings per annum is an aspirational figure and accounts for the Council's predicted jobs

growth over the plan period and reflects the additional new homes required to meet the need for additional workers. This figure also remodels population and household growth and takes into account concealed and homeless families, older people moving into residential institutions and market conditions. The target is not intended to be a restrictive ceiling figure and prevent further delivery of sustainable sites above this level. Additional wording is to be added to policy H 1 Housing Requirement to clarify this.

It is considered more appropriate to assess the five year supply on the housing requirement of 422 dwellings per annum as this is the baseline and minimum housing need for the plan period. It would be unreasonable to assess it on the housing target figure as the Council could be penalised for its economic growth ambitions. The National Planning Practice Guidance supports this approach. It is also important to note that the housing target of 492 dwellings per annum is significantly above the Government's standard method figure of 177 dwellings per annum. It is therefore clear that the Council is not trying to restrict housing land supply.

FIVE YEAR SUPPLY FALL-BACK POSITION

The fall-back position in the last paragraph of policy H 1 with regards to the five year housing land supply is considered to be pro-active and appropriate. It is an approach which has been accepted by Inspectors for other recently adopted Local Plans. If at any time the Council cannot demonstrate a five year supply the tilted balance of paragraph 11 of the NPPF (2019) would be engaged, however the last paragraph of the H 1 provides additional guidance in terms of which areas would be suitable for additional housing land to come forward, if this situation occurred.

For clarification, regardless of the supply position the Council will be supportive of sites which are located within the development limits, are sustainable, suitable for housing and are consistent with relevant national and local policies.

It may not however be clear that, in the circumstance that the Council cannot demonstrate a five year supply of housing land, sites **beyond** the development limits of the main urban area or service villages but well related to the limits, will be supported. This is providing that such proposals comprise sustainable development and are consistent with national and Local Plan policies. The wording as it stands may be interpreted incorrectly; i.e. only referring to sites **within** the development limits. The paragraph is to be amended to improve clarity.

It is also outlined within paragraph 6.2.9 that if monitoring indicates that there is persistent and prolonged under delivery of housing, a review of the housing chapter and housing allocations will be undertaken in order to resolve the situation.

Recommended change to Local Plan:

Amend last paragraph of policy H 1 as follows:

At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites located beyond development limits, that would ~~both~~ make both a positive contribution to the five year supply of housing land and be well related to the development limits of the main urban area or service villages (as defined in policy SH 1) will be supported. Such proposals should comprise of sustainable development and be consistent with relevant national and Local Plan policies.

BROWNFIELD SITES, URBAN SPRAWL AND EMPTY HOMES

There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. Some of the brownfield allocation sites have now received planning permission and have therefore been moved to the housing commitments list (Table 6.4) of the Publication Draft. A number of brownfield sites have also been delivered since the start of the plan period in 2016.

The Local Plan does have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe regeneration area has not been included in the proposed housing allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development.

The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Historically the Borough has grown from the main urban area outwards. Brownfield sites within the main urban area cannot be solely relied upon to meet the housing needs (for reasons outlined above) consequently urban extensions are the next most logical approach to delivering new homes. These sites are adjacent to existing services and transport routes and provide opportunities to deliver new infrastructure and facilities. A number of sites are also proposed in the service villages as these settlements already have a number of facilities/services and good sustainable transport links, therefore they are considered sustainable locations for housing development.

This approach does inevitably result in the loss of largely agricultural land adjacent to the main urban area and service villages, however sites have been selected wherever possible that will minimise the impact on surrounding rural areas. The Council has sought to avoid areas of highest landscape, environmental and agricultural value. The NPPF does promote the effective use of land and the prioritisation of brownfield land. Development in the countryside on the edge of settlements is not however contrary to the NPPF provided that the strategy and sites selected by the Local Plan can be demonstrated to be in line with the overall purpose of the planning system, that is, to contribute to the achievement of sustainable development. The Local Plan should also be read as a whole and there are other policies in the plan which will prevent urban sprawl and protect the open countryside.

A contribution from windfall sites has not been included in the housing supply or housing trajectory, any delivery on windfall sites will provide additional flexibility. Although a contribution of 25 units a year on 'small sites' of less than 10 units has been factored into the trajectory based on average delivery over the local plan period thus far. Making an estimation of larger windfall development over recent years would be difficult for Darlington due to the age of existing housing policies and allocations. A large proportion of the sites being developed more recently would be classed as windfall. Subsequently it is not considered appropriate to make an estimation of a windfall allowance and factor this in to the housing land supply.

The Council is active in working with Registered Providers to bring back into use homes which have been empty for a specific period of time. This supply of homes would not be

sufficient to meet the quantitative housing needs of the borough. It is also expected that there is always some vacancy in the housing market to allow for movement.

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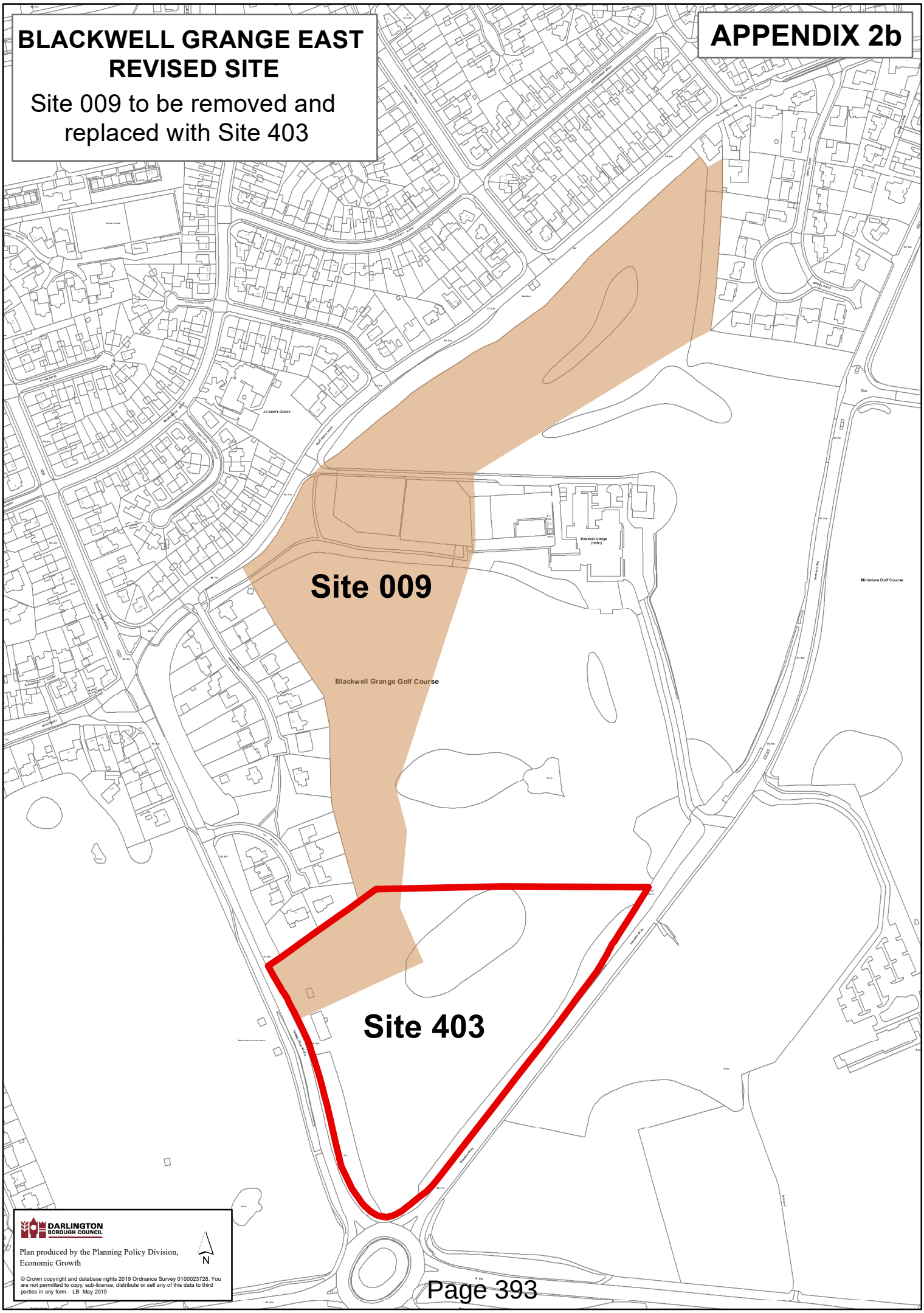
BLACKWELL GRANGE EAST REVISED SITE

Site 009 to be removed and replaced with Site 403

APPENDIX 2b



DARLINGTON BOROUGH COUNCIL

Plan produced by the Planning Policy Division, Economic Growth

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APPENDIX 2c

POLICY H 10: SKERNINGHAM STRATEGIC ALLOCATION
SUMMARY OF MAIN ISSUES AND RESPONSES

Please note: Recommend changes outlined in this paper are in response to the main issues raised during the consultation on the Draft Local Plan. Further changes have been recommended to the policy in relation to other individual comments, and are set out within the main Consultation Summary and Response table.

NUMBERS AND STRATEGY

Dispute the need for this many homes. The Government figure is much lower.

Please see officer response on housing requirement and standard method.

Priority should be given to the development of brownfield land and use of empty properties.

Please see officer response on brownfield sites, urban sprawl and empty homes.

Object to the scale of development proposed on the site.

The Council has adopted a balanced strategy to meeting its housing requirement through the allocation of 18 sites of which 7 sites are 150 dwellings or less, and a further 5 sites under 500 dwellings (at draft plan stage 14 of the 26 proposed allocation sites were 150 dwellings or less). Furthermore, the sites are appropriately spread across the urban area, urban extensions, and the Boroughs larger service villages.

Paragraph 72 of the NPPF recognises that the supply of large numbers of new homes can often best be achieved through planning for larger scale development such as through significant extensions to existing towns, provided that they are well located and designed, and supported by the necessary infrastructure and facilities. This is the Council's intention for the Skerningham Strategic Allocation which has been selected following the consideration of a number of potential strategic growth options as part of the Issues and Scoping consultation and subsequently the Sustainability Appraisal process. The North/North East of Darlington is considered to be a suitable, sustainable and deliverable location for a significant extension of the town.

There are not the jobs to support this scale of development.

The Council's emerging Local Plan provides for the creation of 7,000 new jobs within the plan period. This is in line with previously achieved job creation levels and is therefore deliverable to 2036. The Draft Local Plan identifies 175 hectares (net available) employment land on existing and proposed employment sites, most of which is situated on the east and north-west sides of Darlington town.

It represents development in the countryside and a considerable expansion of the development limit contrary to the NPPF.

Development in the countryside on the edge of settlements is not contrary to the NPPF provided that the strategy and sites selected by the Local Plan can be demonstrated to be in line with the overall purpose of the planning system, that is, to contribute to the achievement

of sustainable development. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal.

This proposal has been led by speculative land agents rather than by the Council.

The Local Plan process has been led by Darlington Borough Council as the local planning authority for the borough. The Council is required to meet the needs of the Borough through the preparation of a Local Plan. In order to identify sufficient suitable, available and deliverable sites the Council initiated a call for sites process in 2014 alongside the Issues and Scoping consultation. This process resulted in some 120 sites being put forward by landowners and developers for consideration as part of the Local Plan. These sites have subsequently been assessed through the Housing and Employment Land Availability Assessment and the Sustainability Appraisal processes, to determine their suitability and sustainability respectively for development, and therefore potential for allocation in the Local Plan. The Sustainability Appraisal process also considered the environmental, social and economic sustainability of various strategic development options open to the Council in developing the Local Plan. To take allocation sites through examination the Council will need to demonstrate that they are capable of being delivered over the Local Plan period, in order to demonstrate this it is necessary to engage with the landowner and developers promoting sites.

Through this process it became clear that sites on the north side of Darlington town had the potential to serve as strategic urban extensions to the town and deliver significant numbers of houses, along with suitably located employment land, to help meet identified local needs. To successfully deliver larger scale sites it is necessary and prudent to engage with the landowners and developers involved in their promotion in order to identify all of the constraints and opportunities involved, understand the viability of development and to develop a masterplan for their development.

The town centre is diminishing.

Town centres around the country are facing a number of challenges such as the growth of online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. Skerningham Strategic Allocation, along with growth elsewhere around the town, will generate increased expenditure in the town centre that will help to support local employment and the vitality and viability of the centre.

Recommended changes to Local Plan

Amend paragraph 6.10.8 to read: 'The site promoters have indicated that the site has the potential to provide ~~up to~~between 15-30 hectares of employment land on the south eastern corner of the site close to the A66 Little Burdon roundabout. However, this land was not assessed as part of the most recent Employment Land Review process and the Plan already makes sufficient provision for the employment needs of the District over the plan period on existing employment sites~~,~~ and ~~at~~ new allocations, such as Central Park, Ingenium Parc and Greater Faverdale. The need to release this part of the Skerningham site for employment

uses will be considered when the Local Plan is next reviewed, and as part of any future update/review of the Council's employment land evidence base.'

ENVIRONMENT & HERITAGE

Development of this site will have an adverse impact on the character of the area and the local environment, resulting in the loss of valuable countryside/agricultural land and wildlife habitats. The development will have no environmental benefits for the area.

An objective of the masterplanning exercise being undertaken for the Skerningham Strategic Allocation is to ensure that key landscape elements, including both natural and historic assets on the site, green spaces and public routes within the area, are retained and protected. The existing green corridor alongside the River Skerne is to be retained within the masterplan along with the creation of new open space to serve new and existing residents and an increase in the area of woodland on the site proposed.

Whilst the proposed build development will result in a change to landscape character, proposed development areas on the site have been located so as to minimise the adverse effects on the wider landscape. This includes the siting of development away from prominent ridge lines, working with the local topography and incorporating existing landscape features such as hedgerows, woodland and trees. Around 45% of the masterplan area is to remain open; this is predominantly to be located in the more sensitive landscape character areas (e.g. in the vicinity of the River Skerne).

Although the proposal will result in the loss of agricultural land, where survey data exists, this confirms that the land is classified as 3b (i.e. not the best and most versatile agricultural land). Across Darlington there are around 14,268 hectares of agricultural land (based on local authority data from Defra, 2016). The proposed Skerningham Garden Community allocation covers 490 hectares, the equivalent of 3% of the total agricultural land in the Borough. As such, the proposed development will not have a materially adverse effect on the quantum of agricultural land in the Borough.

A preliminary ecological appraisal has been undertaken by the site promoter. This survey work has not identified any constraints that would prevent the site from being developed, subject to appropriate mitigation. Mitigation will include strengthening the green infrastructure network within the site providing for net bio-diversity gains in accordance with paragraph 170 of the NPPF and safeguarding protected species and habitats.

This will have an impact on resident's health and wellbeing.

Since 2016 Darlington has been an NHS Healthy New Towns pilot alongside nine other local authority areas across England. Policies in the emerging Local Plan have been informed by six Darlington Healthy New Towns Design Principles. The Draft Local Plan also contains Policy DC 2: Health and Wellbeing, which encourages developments that support improvements to health and wellbeing in Darlington though a number of measures such as integrating health and community facilities, improving accessibility to green spaces, and avoiding impacts on the environment and residential amenity. The policy also requires that developments of 100 or more homes are supported by a Health Impact Assessment as part of the planning application to explain how health considerations have informed design.

The Skerningham strategic Allocation, and associated masterplan framework, has been informed by the Darlington Healthy New Town Design Principles. This is illustrated by the inclusion of measures such as:

- Including a centrally located and well connected neighbourhood centre offering a range of community facilities and services, including the delivery of a health hub;
- Providing 2 new primary schools, crèche and nursery provision, along with a reserve site for a new secondary school;
- Retaining and extending public rights of way, footpaths and cycle routes across the site;
- Providing a network of green and blue infrastructure, with the priority given to wildlife friendly green space (under the provisions of Policy ENV 5), along with space for sport and informal recreation and play;
- Maintaining the green corridor along the River Skerne valley;
- Protecting the amenity of existing residents;
- Providing a focus on encouraging sustainable transport modes including, public transport, walking and cycling, with strong links to adjoining communities, employment locations and Darlington town centre.

Other policies in the Local Plan will also influence the developments impact on the health and wellbeing of residents, including mental health, such as:

- Policy DC 1: Sustainable Design Principles – seeking to reduce carbon emission and create safe and attractive environments;
- Policy H 4: Housing Mix – expecting housing developments to provide an appropriate mix of housing types, sizes and tenures to meet local needs, supporting proposals for specialised housing for older people and those with disabilities, and requiring that a percentage of all new houses meet higher accessible and adaptable dwelling standards; and
- Policy ENV 7: Biodiversity and Geodiversity and Development – conserving and enhancing elements of biodiversity and geodiversity importance on sites with the aim of securing net gains for biodiversity as a result of development.

The area is used for recreation by residents.

Whilst development of the Skerningham Strategic Allocation will inevitably change the nature of the landscape of the area, it will maintain opportunities for recreation by new and existing residents. The walking routes (including formal Public Rights of Way) will be retained and extended as part of the sites development, including new routes along the southern side of the River Skerne. The area of community woodland is to be increase on the site and access will be retained. Existing areas of open space are also to be retained with additional green infrastructure provided, as part of an extensive network of greenspace, as part of the development. Policy ENV 5 of the Draft Local Plan prioritises the provision of wildlife friendly green space as part of on-site provision. The River Skerne Valley will remain as a Strategic Green Corridor in line with the Council's Green Infrastructure Strategy and a further local corridor will be created alongside the line of the East Coast Mainline. The golf club is to be relocated into the area around the community woodland.

Development will impact on/result in the loss of Public Rights of Way. Object to any loss of Green lane.

Green Lane will be incorporated within the future Skerningham Strategic Allocation development. It will be retained and new linkages to the wider green space network

proposed will be introduced across the site linking communities to local facilities/services and the countryside. Throughout the proposed development, existing rights of way will be retained, wherever practicable along their exiting alignment, and new routes provided ensuring that there is an increase in the amount of accessible routes, including those for pedestrians, cyclists and horses.

This will impact on the Brightwater Partnership project.

The circular route proposed under the Brightwater Partnership project on the south side of the River Skerne has been incorporated into the layout of the masterplan framework, along with additional routes providing improved connections to new and existing residential communities.

All of the existing community woodland should be retained. New tree planting to replace the loss of Community Woodland would take decades to establish. Any replacement would be vastly inferior.

As much of the existing community woodland as is possible will be retained as part of the relocation of Darlington Golf Club. It is acknowledged that new tree planting will take time to establish, just as the existing wooded areas have, but new planting will be phased alongside development to ensure that the new planting will have established by the time that the development is complete. New planting will take place as a continuation of the existing woodland site alongside the River Skerne, with the requirement for a net increase in the area of community woodland set out in the policy. The same level of community access as is currently enjoyed by residents will be expected after development, with new routes created along the southern side of the River Skerne. In addition existing hedgerow trees within the wider site will be retained wherever possible and new native trees planted as part of a coordinated landscaping strategy between buildings and as part of new green spaces.

The relocation of the golf club will impact on Skerningham Community Woodland and permissive Public Rights of Way in the area. There is no justification for the relocation of the golf club.

The relocation of Darlington Golf Club will enable new residential properties for be located closer to the town centre, existing local services and employment opportunities. It will allow for the creation of a more logical layout of development on the Skerningham site with a principal vehicular access from the A1150 into the centre of the site. Permissive rights of way in the area will be retained wherever possible along their existing alignment, and as much of the existing community woodland as possible will be retained.

Darlington Golf Club was originally located closer to the River Skerne, north-west of its current location. The relocation of the golf club will be undertaken with the cooperation of Darlington Golf Club who will benefit from the proposal through the provision new modern facilities.

See responses above for further consideration of the impact of the allocation on rights of way and the community woodland.

The Skerningham Masterplan is at odds with the Council's Green Infrastructure Strategy and standards.

The River Skerne Valley will remain as a Strategic Green Corridor in line with the Council's Green Infrastructure Strategy and a further local corridor will be created alongside the line of the East Coast Mainline. New green space will be required as part of development in line with the provisions of Policies ENV 4: Green Infrastructure and ENV 5: Green Infrastructure Standards. The allocation is required to deliver a net increase in the area of community woodland on the site as a consequence of development. Existing wildlife interests on the site will be protected under Policy ENV 7: Biodiversity and Geodiversity and Development.

Object to the proposed changes to Springfield Park (which is an Asset of Community Value). Allowing a road across Springfield Park will destroy it.

The proposals set out in the Draft Local Plan would see Springfield Park retained as part of the sites development with provision made for a new vehicular access across the eastern edge of the park designed so as to minimise its impact on the recreational value of the remaining parkland area. Replacement green space was to be provided on the land immediately to the north of the park, along with suitable enhancements to the park designed in consultation with the local community. However, following additional engagement with the public and other stakeholders on this matter in January 2020, organised at the request of Council Members, Springfield Park has been removed from the Skerningham Strategic Allocation Site.

Concerned that development will result in flooding of the River Skerne.

New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). Areas at risk of surface water flooding have been taken into account in the layout of development on the emerging masterplan. Built development will be located outside flood zones 2 and 3 (i.e. those areas most susceptible to flooding). Through incorporating appropriate sustainable drainage systems development will limit water runoff into watercourses to greenfield rates in line with Policy DC 4: Flood Risk & Sustainable Drainage Systems (SUDS). Priority will be given to the use of natural drainage features that will form part of the blue-green infrastructure provision on the site.

Development will compromise the character and setting of the listed building on the site. The Council has overlooked the deserted medieval village on the site.

Where necessary, the Council will undertake an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. This work will be undertaken prior to their inclusion in the Proposed Submission Local Plan. Once completed, appropriate mitigation measures identified will be included within the policy and/or supporting text.

The area associated with the potential location of the deserted medieval village of Skerningham is included on Figure C.1 showing Areas of High Archaeological Potential, found in Appendix C of the Draft Local Plan. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report.

Development will bring noise, air and light pollution.

The NPPF (paragraph 170) states that planning policies should contribute to and enhance the natural environment through, amongst other things, preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. It goes on the state that development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

New development will have an impact on greenhouse gas emissions (e.g. through the use of energy and vehicle emissions) but the Draft Local Plan seeks to minimise this through its locational strategy and a number of complimentary policy requirements. The strategy looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. All new development will be required to adhere to relevant national standards on construction, materials, energy efficiency of building and water use. The Sustainability Appraisal which informed the Council's decisions on site selection also considered the potential for noise, vibration, odour and light pollution resulting from different site options, seeking to avoid locations that would be more susceptible.

Below are a number of examples of how policies in the Draft Local Plan seek to influence the location, form and design of new development in order to minimise its impact on different forms of pollution:

- Policy DC1: Sustainable Design Principles - requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption, and how buildings have been made energy efficient thereby reducing carbon emissions.
- Policy DC 2: Health and Wellbeing - requires that developments of 100 or more homes are supported by a Health Impact Assessment as part of the planning application to explain how health considerations have informed design.
- Policy DC 3: Safeguarding Amenity – avoiding conflicts between neighbouring developments including from noise and disturbance, artificial lighting, vibration and emissions emanating from a use of land and buildings.
- Policy ENV 4: Green Infrastructure – offering protection of existing green spaces and requiring new residential and non-residential development to provide new green infrastructure alongside development.
- Policy ENV 7: Biodiversity and Geodiversity and Development – conserving and enhancing elements of biodiversity and geodiversity importance on sites with the aim of securing net gains for biodiversity as a result of development.
- Policy IN 2: Improving Access and Accessibility – promoting accessibility and permeability by creating places that are well connected with each other and with existing transport networks. Prioritising the needs of pedestrians, cyclists, bus and rail users to reduce the need for travel by private vehicle.

The development would affect amenity of existing residential properties.

Development proposals on the Skerningham Strategic Allocation site, and all other development proposals, will be required to adhere to the provisions of Policy DC 3: Safeguarding Amenity. The policy seeks to protect amenity of existing users of neighbouring land and buildings, and the amenity of the intended users, through careful siting, design and layout of development.

Recommended change to Local Plan:

Amend the final sentence of Policy H 10 to read: 'The site design and layout will be required to ~~protect and~~ conserve and enhance the ~~Listed Buildings and Scheduled Monument~~designated heritage assets on and adjacent to the site, together with their settings, in accordance with Policy ENV 1.'

Amend the second and last sentence of paragraph 6.10.11 to read: 'Around~~Over~~ 45% of the site area is expected to be retained and enhanced as accessible green infrastructure ~~and~~, managed agricultural land and the relocated golf club, ~~including a large~~ as part of a wide green corridor ~~of land~~ on the south side of the River Skerne forming the river valley, and along the East Coast ~~m~~Mainline. In addition, further green space will be provided within the remainder of ~~Within~~ the site, creating an extensive network of green infrastructure ~~will be provided~~ connecting residential areas and community facilities, delivered in line with Policy ENV 4.'

Add the following sentence to Paragraph 6.10.12: 'Development will be expected to improve the value and ecological mix of the River Skerne corridor in line with the measures set out in Policy ENV 7, and must follow the sequence of actions laid out in Policy ENV 8 to identify how the potential impacts of development on biodiversity can be avoided, or failing that adequately mitigated.

Delete paragraph 6.10.13: '~~Springfield Park is to be retained as part of the sites development. Provision is to be made for a new vehicular access across the eastern edge of the park designed so as to minimise its impact on the recreational value of the remaining parkland area. Satisfactory replacement green space is to be provided on the land immediately to the north of the park in line with the conditions of Policy ENV 4, along with suitable enhancements to the park designed in consultation with the local community.~~'

Amend paragraph 6.10.14 to read: 'The site contains ~~a number of Listed Buildings,~~ the Grade II Listed Skerningham Farmhouse, which was the home of the noted cattle breeder Charles Colling, and Low Skerningham cottage and stable. The site is adjacent to the Ketton Bridge Scheduled Monument, and close to ~~the historic~~ heritage assets in and around the villages of Great Burdon and Barmpton. It is therefore necessary that the design and layout of development on the site conserves and enhances the significance of these assets and the contribution their rural setting~~s~~ makes to their significance in line with Policy ENV 1 and national policy. Also present on the site is the potential location of the deserted medieval village of Skerningham (indicated on Figure C.1: Area of High Archaeological Potential) and a burial site. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report.'

TRANSPORT AND INFRASTRUCTURE

Development will put a strain on the town's already overstretched roads and services.

Transport modelling has tested highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Development of the Skerningham Strategic Allocation site will be required to deliver improvements to the existing

highways network, and new highway infrastructure, sufficient to mitigate the impact of development on the local road network.

Policy IN 1 confirms the Councils commitment to delivering an efficient transport system with a focus on the provision of infrastructure improvements to encourage greater use of sustainable modes of travel (including walking, cycling and public transport) leading to less reliance on single occupancy vehicle journeys. As set out in the policy and at paragraph 6.10.9, the Skerningham Stategic Allocation will be designed so as to enable bus access and circulation and will include improvements to the walking and cycling network connecting to and across the site.

See responses below relating to infrastructure requirements.

The road network is not suitable for the scale of additional traffic.

All of the principle vehicular access points already have bad traffic congestion during the morning and afternoon peak.

Even if a link road goes ahead, the traffic removed from the A1150 will simply be replaced by that from the Skerningham development.

The site could impact on junction 59 of the A1(M) and A66.

Object to any link road development.

Transport modelling work has tested highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.

An application for the Skerningham Strategic Allocation site will need to be supported by an up to date Transport Assessment and Travel Plan in line with Policy IN 3 in order to minimise and manage the impact of development on the highway network and encourage more sustainable transport choices (e.g. walking, cycling, public transport and car share).

Plans for a Northern Link Road are being explored by the Tees Valley Combined Authority in conjunction with Highways England and Transport for the North. A link road will help improve east west connectivity across the Tees Valley and South Durham, linking the A1(M) more directly to Teesport, bypassing residential communities along the A1150 and A167. The link road will remove strategic vehicle movements from the urban area, and in particular a significant proportion of HGVs, reducing the level of pollution linked to these vehicles. Only the outer link road route is now being explored and this will be reflected in changes to the policy wording and supporting text.

The additional traffic generated by the development will cause congestion, air pollution, noise, and affect road safety.

See earlier comments relating to noise, air and light pollution.

The Highway Authority has powers to implement mitigation measures where highway safety is a concern on existing roads including speed limits, traffic calming, parking restrictions etc. The Highway Authority have also contributed to the site assessment process and will continue to be involved through to planning application stage of any allocations.

A new development must include adequate infrastructure and services.

As set out in the policy, the Skernignham Strategic Allocation will be expected to deliver a range of community facilities required to support the new residential population, providing for peoples day to day health, education and household needs. This will likely include schools, healthcare facilities, shops and green space.

Skerningham Strategic Allocation incorporates the NHS Healthy New Towns proposals, including a neighbourhood centre at the heart of the development. This will include provision for a doctors' surgery and pharmacy.

In addition, utility providers, public transport operators and the emergency services have been engaged during the development of the Local Plan to determine the capacity of existing services and facilities and to determine what improvements are required to support growth across the Borough. Required extensions / improvements to facilities and services will be delivered as part of the sites development.

There are significant infrastructure requirements needed but no indication of when they will be delivered.

The Council will publish an Infrastructure Delivery Plan alongside the Proposed Submission Local Plan setting out the requirements for improvements to existing infrastructure / provision of new infrastructure to support the planned level and location of growth around the Borough. This document will provide an indication of the phased delivery of infrastructure, the cost involved and responsibilities for its delivery.

Development of the Skerningham Strategic Allocation site will be carefully phased so that new infrastructure and facilities are provided alongside, or where appropriate in advance of, new properties. Phasing will ensure that new communities are supported by appropriate infrastructure, and to minimise the pressure placed by development on existing services and facilities in the area.

Recommended change to Local Plan:

Amend criterion vii of policy H 10 to read: 'A local distributor road between the A167 and A1150 close to the Little Burdon roundabout, to include a crossing of the East Coast Mainline, and ~~S~~safeguarded a corridor~~s~~ 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 across the River Skerne to the ~~outer~~ Northern Relief Road route~~ option across the River Skerne as required~~;

Amend paragraph 6.10.10 to read: 'The site will require the delivery of a new internal distributor road between the A167 north of Beaumont Hill and the A1150 close to the A66 Little Burdon roundabout. The specification of this road will be determined by the Transport Assessment submitted with a planning application for the site. As set out in the Transport and Infrastructure section and illustrated on the Key Diagram, there are aspirations to improve the strategic road network across the Tees Valley including the potential for a new Northern Link Road improving the connectivity between the A1(M) and the A66. ~~Currently two possible alignments for the~~ A business case, and detailed alignment and specification, for the Northern Link Road are being explored by the Tees Valley Combined Authority in conjunction with Highways England and Transport for the North, with a view to delivering the link road over the next 10 year. It is anticipated that the Northern Link Road will include a connection into the centre of the Skerningham Stategic Allocation site across the River Skerne ~~both of which have implications for the Skerningham strategic allocation. Until the~~

~~route and funding for a Northern Link Road are confirmed, i~~It is therefore important that the ~~plans~~ proposals for the Skerningham site do not compromise the delivery of the Northern Link Road, and make suitable provision for it in the masterplan for the site.~~either the inner or outer Northern Link Road route options (including a potential crossing of the East Coast mainline) and/or the provision of an internal distributor road.~~

Amend Figure 6.1 to show the potential route of the local distributor road and potential outer alignment of the Northern Link Road.

Delete Figure 6.2 from the Local Plan.

CONSULTATION

There has been insufficient public consultation regarding the proposals for Skerningham. Believe that public comments will not affect the outcome. **There has been no consultation with local community groups on the proposals.**

The concept of a strategic development on the north side of Darlington has been in the public domain for over two years and, during that time, there have been a number of opportunities for residents to find out more about what was being proposed and make their views known on the potential development and shape emerging plans for the area. The idea of locating strategic development to the north side of Darlington as part of the emerging Local Plan was first considered in the Council's Issues and Scoping document that was published for consultation during the summer of 2016. In November 2016, a report on the consultation was taken to Cabinet along with a paper setting out a proposed Local Plan Strategic Framework for Darlington, clearly identifying the North of Darlington as a strategic location for growth.

The Council has adopted a masterplanning approach to the development of strategic development proposals at Skerningham and Greater Faverdale. This is an appropriate approach to take to ensure that these significant development proposals are fully integrated with the town and respond appropriately to the particular constraints and opportunities of each site. The sites promoters, Theakston Land and Banks Group, undertook a consultation exercise during the Autumn of 2017 on early plans for Skerningham, distributing flyers to homes in the vicinity of the proposed allocation site, and holding a consultation event in the Harrowgate Club. As a result of that consultation exercise changes were incorporated to the emerging masterplan, including the removal of housing development from Springfield Park and the incorporation of increased separation distances from existing dwellings along Green Lane.

The Council undertook a six week public consultation on the Draft Local Plan during the summer of 2018, including proposals for the Skerningham Strategic Allocation. The consultation included a number of drop in sessions at the Dolphin Centre and attendance at locally organised events to publicise the plan and engage with local residents and businesses.

Additional engagement with the public and other stakeholders took place in January 2020 to inform them of the results of further traffic modelling work on the need for an access across Springfield Park and potential designs for a remodelled park. This engagement was

prompted by the request of Members for further work to be undertaken on this area of objection to the Draft Local Plan.

Information on the Local Plan process to date along with copies of reports and papers can be found at: https://microsites.darlington.gov.uk/local-plan/.

Recommended change to Local Plan:

No changes recommended.

HERITAGE POLICIES PAPER – RECOMMENDED CHANGES to POLICIES ENV 1 & ENV 2 IN RESPONSE TO COMMENTS MADE BY HISTORIC ENGLAND

Please note: Recommend changes outlined in this paper are in response to the comments made by Historic England to Policies ENV 1 and ENV 2 of the Draft Local Plan, and have been agreed with Historic England during subsequent discussions. Further changes have been recommended to these policies in relation to other individual comments, and are set out within the main Consultation Summary and Response table.

Safeguarding the Historic Environment

9.1.1 National planning policy([20]) requires local planning authorities to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. It emphasises the importance of sustaining and enhancing the significance of heritage assets and acknowledges the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

9.1.2 The historic environment includes areas and buildings, archaeological sites, historic streets and transport routes, historic landscapes, parks and other green spaces. It is a non-renewable, shared resource, and any loss or harm to it is usually irreversible. Understanding the significance of the historic environment and the contribution that the setting of historic assets makes to their significance is essential to guide good decisions about land use change and development affecting them.

9.1.3 As a group, Darlington's archaeology and historic buildings are of considerable significance not least because of its potentially significant railway, industrial and Quaker history. The Borough's designated heritage assets([21]) include:

- Over 550 Listed Buildings;
- 20 Scheduled Monuments;
- 17 Conservation Areas; and
- 2 Registered Parks and Gardens

9.1.4 The Borough also contains a wealth of non-designated heritage and archaeological assets. Non-designated heritage assets can be summarised as parts of the historic environment including buildings, structures, areas and archaeology that are considered by the Local Planning Authority to be locally significant. They can be identified through strategic planning and development management, included on a Local List, and can sometimes be as significant as designated assets.

9.1.5 The origins of the town of Darlington first appeared in writing in 1003. The small Anglo-Saxon settlement experienced medieval growth as a result of Darlington's position in the Durham bishopric. The market flourished to serve an agricultural hinterland and those passing through the town on the Great North Road between London and Edinburgh. Around St Cuthbert's Church, a

[20] Chapter 16~~2~~, National Planning Policy Framework (NPPF), DCLG, 2019~~2~~

[21] Identified on the Historic Environment Record (HER) maintained by Durham County Council's Archaeology Service on behalf of Darlington Borough Council

prominent Grade I listed town centre landmark, grew an ecclesiastical complex, with the Bishop's palace at its heart (1164 -1870). By the 1530s Darlington was described as the best market town in the bishopric outside of Durham. In 1585 a fire destroyed most of medieval Darlington. The town was rebuilt within the medieval streets and burgage plots and this pattern of central yards and wynds survives in the town centre today. There was little building beyond the confines of the medieval settlement, other than the mansions of the influential Quaker families on the fringes of the urban core, until growth was triggered by the arrival of the railway([22]).

9.1.6 Opened in 1825, the Stockton and Darlington Railway was funded by Edward Pease a prominent Darlington Quaker as the world's first publicly financed passenger railway. This is covered by a standalone policy (see Policy ENV 2) due to its national significance.

9.1.7 Darlington has particularly significant Quaker history and associated heritage assets. Darlington Quakers played an active part in the government, industry, commerce and development in the town during the eighteenth and nineteenth centuries. They were responsible for many of Darlington's landmark Victorian public buildings and manor houses, parks and cemeteries including South Park, the indoor market and clock tower, and the Friends Meeting House. The value and significance of these assets is recognised, for their contribution to the unique identity of the borough and their potential contribution to tourism. Non-designated heritage associated with the Quaker movement includes Elm Ridge Methodist Church and Carmel School.

9.1.8 Darlington has also played a significant role in the development of industry. It has a number of designated heritage assets of significance to industries like leather, tanning, textiles and steel. Designated assets include Tees Cottage Pumping Station and the Cummins building on Yarm Road, the latter being the most contemporary building – constructed in 1965 - to be listed.

9.1.9 'Experience Darlington' is an overarching concept promoting heritage assets as part of the Visitor Economy Strategy([23]) that seeks to link and make the most of Darlington's locally distinct heritage as summarised above.

9.1.10 The vision for Darlington's Town Centre Fringe and its historic environment is set out in the Conservation Management Plan([24]) and aims for the area to be transformed into a vibrant urban area with well-maintained historic buildings, exciting small scale modern development, a thriving tourism industry based on railway heritage and a healthy, accessible river.

9.1.11 The Borough contains a significant Roman settlement at Piercebridge and other characterful rural villages and hamlets. These villages are home to a high concentration of listed vernacular cottages and historic farm buildings and are generally designated as Conservation Areas. Several of the Conservation Area villages are located along the River Tees corridor and this relationship with the river setting is an integral part of their historic and aesthetic value. Walworth Castle is a prominent Grade I listed building in a picturesque rural setting within the Borough. The character of the Borough's rural historic environment and the heritage assets integral to it will be protected, enhanced and promoted.

9.1.12 The Council will support proposals which conserve and where appropriate enhance the historic environment of Darlington. Particular consideration will be given to ensure that the

[22] Gillian Cookson: The Townscape of Darlington (2003)
[23] Experience Darlington: A Visitor Economy Strategy 2016-2026, DBC
[24] A Conservation Management Plan for Darlington Town Centre Fringe, 2010, Archaeo-Environment

significance of those elements of the historic environment which contribute most to Darlington's distinctive identity and sense of place are not harmed. These include:

- The buildings, spaces, trackbed and other infrastructure associated with the Stockton and Darlington Railway.
- The medieval streets and burgage plots associated with medieval Darlington.
- Evidence of Roman activity such as the settlement at Piercebridge.
- The mix of buildings and spaces associated with the Quaker movement including Victorian public buildings, manor houses, parks and cemeteries.
- Remnants of Darlington's industrial heritage including leather, tanning, textiles and steel and its associated infrastructure.
- The historic farm buildings and rural villages and hamlets, including those along the River Tees.
- The range of its places of worship.
- Conservation areas and listed buildings across the Borough.
- Key cultural assets encompassing parklands, woodlands, landscapes, canals and riversides, museums, libraries, art galleries, public art, food and drink, customs and traditions.

Policy ENV 1

Protecting, Enhancing and Promoting Darlington's Historic Environment

A) Designated heritage assets

Proposals affecting a designated heritage asset (Listed Buildings, Historic Parks and Gardens, Scheduled Monuments, or an archaeological sites of national importance) should conserve those elements which contribute to its significance, including any contribution made by its setting. Harm to such elements will be permitted only where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset (or an archaeological site of national importance) will be permitted only in exceptional circumstances.

Development involving the alteration, extension or change of use of a listed building or construction of any structure within its curtilage must:

i. protect its significance as a listed building; and
ii. protect existing historic hard and soft landscaping features including trees, hedges, walls, fences and surfaces; and
iii. protect historic plot boundaries and layouts; and
iv. ensure the optimum viable use of the building, where appropriate.

Any development affecting the setting of a listed building will be permitted if the proposal conserves or enhances either its significance and/or the contribution its setting makes to its significance. Proposals involving the demolition of a listed building or structure within the curtilage of a listed building will not be permitted, except in exceptional circumstances as detailed in national policy.

Development will only be permitted in Parks and Gardens of National Interest where it cannot be accommodated elsewhere, is directly related to the conservation management of the park or garden, and does not harm those elements which contribute to its enjoyment, layout, design, character, appearance or setting (including key views from or towards the landscape).

B) Conservation Areas

Proposals affecting~~Development in~~ a conservation area, involving the alteration, extension or change of use of a building or construction of any structure ~~must~~should preserve and enhance those elements identified in any conservation area appraisal as making a positive contribution to the significance of that area. ~~pay s~~Special attention should be given to:

i. existing architectural and historic character and associations by having regard to the positioning and grouping, form, scale, massing, detailing of development and the use of materials in its construction; and
ii. existing hard and soft landscaping features including areas of open space, trees, hedges, walls, fences, watercourses and surfacing and the special character created by them; and
iii. historic plot boundaries and layouts; and
iv. the setting of the conservation area.

Built development will not be permitted on public and private open spaces within or adjacent to conservation areas where they make a positive contribution to its setting as identified in the conservation area appraisal~~are important to the~~ including landscape and~~or~~ townscape ~~qualities of the conservation area or provide~~and views or vistas into, from or within the conservation area, unless it can be demonstrated that the ~~wider~~ public benefit demonstrably outweighs the harm ~~to the heritage asset. These areas will be identified in conservation area character appraisals~~.

The demolition of buildings or structures in a conservation area will not be permitted if:

v. the building makes a positive contribution to the ~~architectural or historic~~ character and appearance of the conservation area (as identified within the conservation area appraisal); and
vi. the structural condition of the building is repairable; and
vii. there are no approved detailed plans for the redevelopment of the site and a contract has not been entered into for the implementation of that redevelopment; and
viii. there has been insufficient consideration of other options to re-use the building in its current form.

~~**B) Listed Buildings**~~

~~Development involving the alteration, extension or change of use of a listed building or construction of any structure within its curtilage must:~~

~~v. protect its significance as a listed building; and~~
~~vi. protect existing historic hard and soft landscaping features including trees, hedges, walls, fences and surfaces; and~~
~~vii. protect historic plot boundaries and layouts; and~~
~~viii. ensure the optimum viable use of the building, where appropriate.~~

~~Any development affecting the setting of a listed building will be permitted if the proposal conserves or enhances either its significance and/or the contribution its setting makes to its significance.~~

~~Proposals involving the demolition of a listed building or structure within the curtilage of a listed building will not be permitted, except in exceptional circumstances as detailed in national policy.~~

C) Archaeological Sites~~ and Scheduled Monuments~~

Proposals affecting archaeological sites of less than national importance should conserve those elements which contribute to their significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for

excavation and recording before or during development. Subsequent analysis, publication and dissemination of the findings will be required to be submitted to the local planning authority and deposited with the Historic Environment Record.

Development proposals involving ground disturbance in Areas of High Archaeological Potential (as identified in APPENDIX C), must be accompanied by an archaeological evaluation report. Householder development and extensions, and alterations to existing commercial premises of 40 metres squared or less, are exempt from this requirement unless the proposed development is likely to affect~~directly affects or is within 50 metres of~~ a Scheduled Monument. ~~Development proposals should also fully consider and protect the setting of Scheduled Monuments.~~

Outside Areas of High Archaeological Potential, planning applications on sites of more than 1 hectare must be accompanied by an archaeological evaluation report, unless the area is already known to have been archaeologically sterilised by previous development (such as mineral extraction).

~~**D) Historic Parks and Gardens**~~

~~Development will only be permitted in Parks and Gardens of National Interest where it cannot be accommodated elsewhere, is directly related to the conservation management of the park or garden, and does not harm those elements which contribute to its enjoyment, layout, design, character, appearance or setting (including key views from or towards the landscape).~~

D~~E~~) Non-Designated Heritage Assets

Proposals ~~for the demolition~~ which would remove, harm or undermine the significance of a non-designated heritage asset~~s~~ will only be permitted where the benefits are considered to outweigh the harm to the character of the local area. Proposals must protect and enhance the significance of a non-designated heritage asset, including its setting, through good design.

Applications involving the demolition of a non-designated heritage building or structure must demonstrate that there is no sustainable use of the building~~; and proposals for alterations and extensions must be based on a proportionate understanding of the significance of the asset including the structure, and respect the architectural character, and detailing of the original building. The structure, features, and materials of the building that contribute to its architectural and historic interest should be sustained or enhanced with appropriate materials and techniques proportionate to their significance~~.

~~Proposals must protect and enhance the setting of non-designated heritage assets through good design and be proportionate to their significance.~~

E~~F~~) Heritage at Risk

Proposals that would help to safeguard the significance of and secure a sustainable future for Darlington's heritage assets, especially those identified as being at greatest risk of loss or decay, will be supported.~~remove heritage assets from the Heritage at Risk Register are encouraged. The Council will support proposals to alter 'Heritage At Risk' where they will result in the optimum, viable and sustainable use. Particular support will be given to schemes that preserve or enhance heritage assets' settings and archaeological remains most at risk through neglect, decay or other threats.~~

F~~G~~) Securing the optimum viable use

If the existing or original use of a heritage asset is no longer viable development proposals will be required to secure the optimum viable alternative use.

~~H) Enabling development~~

~~In exceptional circumstances proposals for enabling development, which would otherwise conflict with adopted development plans and national policies, but which would secure the future conservation of a heritage asset may be permitted if:~~

- ~~i. the development secures the long-term future of an asset and, where applicable, its continued use for an appropriate purpose; and~~
- ~~ii. the development is necessary to resolve problems arising from the inherent needs of the asset, rather than the circumstances of the present owner, or the purchase price paid; and~~
- ~~iii. sufficient funding is not available from any other source to support the heritage asset; and~~
- ~~iv. the amount of enabling development is the minimum necessary to secure the future of the asset and that its form minimises harm to public interests; and~~
- ~~v. the public benefit of securing the future of the asset significantly outweighs the dis-benefits of the development not being in accordance with other planning policies.~~

~~I) Energy efficiency~~

~~Retrofitting energy efficiency measures and low carbon technologies into heritage assets will be encouraged where this does not impact on significance, or any harm to significance, and delivers a public benefit to outweigh the harm.~~ [Include a new criterion under Policy DC 1: Sustainable Design Principles criterion b. to read: 'energy efficiency measures and low carbon technologies will be encouraged, where this does not result in harm to the significance of a heritage asset;'

9.1.13~~2~~ The Council has a statutory duty to protect designated heritage assets such as listed buildings and scheduled ~~ancient~~ monuments. Great weight will be given to the conservation of heritage assets in line with national planning policy([25]).

9.1.14 In addition to the Council's statutory obligations regarding the historic environment[26], the Council the will:

a) Seek to identify, protect and enhance local heritage assets;
b) Promote heritage-led regeneration, including in relation to development opportunities in Darlington's Town Centre Fringe and proposals in relation to the Stockton & Darlington Railway Heritage Action zone;
c) Produce conservation area appraisals and management plans;
d) Maintain its positive approach to safeguard the future of heritage assets at risk.
e) Adopt a proactive approach utilising development opportunities to increase the promotion and understanding of the area's archaeology.

9.1.15~~3~~ The Council will encourage developments promoting the educational, recreational and/or tourism potential of the locally distinct heritage, landmarks and historic villages of the Borough through sensitive management, enhancement and interpretation of these heritage assets as set out in the Visitor Economy strategy.

9.1.16~~4~~ The Council will also seek to deliver the vision for Darlington's Town Centre Fringe over the plan period, to be transformed into a vibrant urban area with well-maintained historic buildings,

[25] Paragraphs 193~~132~~ to 197~~134~~ of the NPPF
[26] Town and Country Planning Act 1990; Planning (Listed Buildings and Conservation Areas) Act 1990; and, Ancient Monuments and Archaeological Area Act 1979

exciting small scale modern development, a thriving tourism industry based on railway heritage and a healthy, accessible river, as set out in the Town Centre Fringe Conservation Management Plan.

Conservation Areas

9.1.175 In Conservation Areas particular attention must be given in all planning decisions to the desirability of conserving and enhancing a Conservation Area's significance. The Council will consider introducing Article 4 Directions where a Conservation Area is identified as 'At Risk' when annually surveyed by the Local Authority in conjunction with Historic England.

9.1.186 As part of the Council's positive strategy for the historic environment, it will prepare and review Conservation Area Character Appraisals and Management Plans for each conservation area, including any proposed new or extended areas, as the basis for determining proposals within or where it would affect the setting of conservation areas.

Listed Buildings

9.1.197 The Borough of Darlington is fortunate in having a large stock of important listed buildings within its boundary, including those associated with the early railways. A listed building can be any kind of structure, such as a signpost, postbox, bridge, or telephone kiosk, for example, and not necessarily a building.

9.1.2018 Any changes affecting the character or appearance of a listed building are likely to require Listed Building Consent. For example historic fabric such as doors, windows, fireplaces and so on are important to the character of the building and consent is likely to be required for their alteration, removal or replacement. Applications for Listed Building Consent are dealt with by the Council's Planning Team, alongside applications for Planning Permission and other planning-related applications (e.g. proposals for a change of use, extension or other alteration to the envelope of the building, or development within its curtilage). It is always advisable to consult the Borough Council's Planning Services section before proceeding with any changes.

Archaeological Sites and Scheduled Monuments

9.1.219 Significant archaeology (designated and non-designated) in the Borough include those from the Iron Age, Roman and Medieval periods. New archaeological investigations and finds continue to be added to the Historic Environment Record (HER) allowing greater understanding of this element of the historic environment. Survey and recording prior to development is an important way of adding to the record, particularly in areas of known local historical interest, such as within designated Conservation Areas, and Areas of High Archaeological Potential (see **APPENDIX C**), where archaeological finds are more likely unless the area has already been archaeologically sterilised by an activity such as mineral extraction.

9.1.220 In line with national planning policy([27]), applications for development involving ground disturbance within Areas of High Archaeological Potential will require the submission of an appropriate desk-based assessment and, where necessary, a field evaluation. Where archaeology is found to be present the Council will require a mitigation strategy involving either preservation in situ, or excavation, analysis and reporting, or a combination of the two. Proposals affecting archaeological sites or monuments will only be approved where a satisfactory mitigation measures

[27] NPPF paragraph 18928

can be implemented. Exemptions are made in Policy ENV 1 for small scale householder and commercial development that are unlikely to affect a Scheduled Monument.

9.1.231 Outside of the identified Areas of High Archaeological Potential, Durham County Council take the approach that desk-based assessment and field evaluation is required for all development proposals affecting an area of 1 hectare or more, unless it is already known to have been archaeologically sterilised by previous development such as mineral extraction. The reasoning underpinning this is that archaeological investigation and research in recent decades has shown right across the country that the number and geospatial density of archaeological sites is far higher than previously imagined and so the likelihood of encountering archaeology on a site of this size or larger has increased.

Historic Parks and Gardens

9.1.242 A Register of Parks and Gardens of "Special Historic Interest" is maintained by Historic England to encourage their protection and conservation but has no associated statutory controls. The two registered sites within Darlington Borough are both Grade II, and both publicly owned: South Park and West Cemetery.

Non-designated Heritage Assets

9.1.253 The significance, character and setting of heritage assets of local interest will be identified using the criteria provided at **APPENDIX C** and protected through the development management process (including pre-applications), through plan making (including neighbourhood plans), the production of Conservation Area Character Appraisals and Management Plans, and other Council activities.

Heritage at Risk

9.1.264 Heritage at Risk includes buildings, structures and sites whose preservation is threatened, often by vacancy or lack of regular repair and maintenance. Darlington Council maintains a register of Grade II Listed Buildings at Risk (available online and on request). The ultimate responsibility for a historic building lies with its owner. However, the Council has the authority to issue enforcement notices to require necessary works to ensure a heritage asset is no longer at risk. These powers are used sparingly; it is in the best interests of all parties if work is carried out voluntarily and before emergency work is required. The Council adopts a proactive approach to heritage at risk by actively engaging in advice for proposals to enhance Heritage at Risk resulting in sustainable uses. Proposals that either secure the future of heritage at risk or prevent assets from becoming 'at risk' in the first place will be encouraged where the significance of the asset can be adequately protected.

Securing the Optimum Viable Use

9.1.275 For statutorily protected buildings, those within conservation areas and non-designated heritage assets, the Council will seek to secure the optimum viable use. Keeping a building in its original use is preferred, as it generally has least impact on its character or appearance. It may be converted to a new use, if it can be demonstrated that it will be compatible with the significance and the setting of the historic building, and not detract from other evidential, historic, aesthetic or communal heritage values.

~~**Enabling Development**~~

~~9.1.26 Enabling development will be considered as a last resort when other efforts to secure a sustainable future for Heritage at Risk assets or any other asset that require investment, restoration~~

~~and repair have failed. The Council will assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset and offer sufficient benefits in heritage terms, outweigh departing from planning policies. Any assessment will be based upon sound evidence that demonstrates that enabling development is the only way to secure the long term future of the heritage assets.~~

~~Energy Efficiency~~

~~9.1.27 When considering the alteration, extension or construction of any structure related to historic buildings within conservation areas and which are either listed or of local importance, the council will not prejudice the incorporation of energy efficiency measures and low carbon technologies as long as proposals are in accordance with the principles set out in this policy and the suite of Historic England guidance documents on energy efficiency.~~

Assessment of Heritage Significance

9.1.28 The Council has a responsibility to consider whether a building or structure is a heritage asset, either designated or non-designated, when exercising its planning powers. In Darlington many heritage assets will be related to the railways, Quaker's and industry but there are assets that have other local significance. The Council intends to produce a Local List, with community involvement and support, that would also include the relevant content of adopted neighbourhood plans. In the meantime, the Council has published a Criteria for Assessing Non-Designated Heritage Assets, based on Historic England guidance. This will enable the identification of non-designated heritage assets as they are brought to the Councils attention, particularly when proposals to alter them are received. Developing community skills and building capacity to identify non-designated heritage assets will help the Council to proactively meet its statutory duties in this regard. The Council is looking at options to set up an interactive way for people to nominate local heritage as well as comment on those put forward by the Council.

9.1.29 National planning policy([28]) requires applicants to assess the significance of heritage assets likely to be affected by a proposal including any contribution made by its setting([29]) and the impact of development on them. Further information is available on the Council's website to assist in compiling an assessment of significance. This should be submitted in a Heritage Statement or Heritage Impact Assessment. Potential developers are advised to contact the Council in advance to find out what level of detail will be required, as this will vary for the type and size of proposal, and the number and significance of heritage assets likely to be affected. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Planning Applications

9.1.30 Permission will not be granted for applications which are not fully justified and accompanied by the information necessary to fully assess the impact of the proposal on the significance of a designated or non-designated heritage asset or assets. Proposals that affect heritage assets should be accompanied a Heritage Impact Assessment to demonstrate that the architectural and historic interest of the structure has been understood and accounted for in any proposals. Proposals that

[28] Paragraph 189~~28~~ of the NPPF

[29] Historic England defines the setting of a heritage asset as "The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape"

affect assets of the highest significance([30]) should also be accompanied by a Statement of Significance, which may form part of a Design and Access Statement.

9.1.31 Where permission is granted for a development which would result in the total or partial loss of a designated heritage asset, approval will be conditional upon the asset being fully recorded and the record and commentary deposited with the Local Planning Authority and the Historic Environment Record.

Protecting, enhancing and promoting the Stockton and Darlington Railway

9.2.1 The route of the Stockton and Darlington Railway through the Borough is mostly intact and still serves a transport function. The route includes several important structures, but only some, such as the scheduled Skerne Bridge, have statutory protection. The area around North Road Railway Station and within the Northgate Conservation Area has a particular concentration of railway heritage, including the Museum, Carriage Works, Lime Cells and Goods Shed and associated Victorian residential terraces. In addition to designated assets, Westbrook Villas, the Coal Drops to the rear of Westbrook Villas and the Railway Tavern Public House on Northgate are examples of non-designated assets to be found in the Borough with strong links to the town's railway heritage.

Policy ENV 2

Stockton and Darlington Railway (S&DR)

Proposals which will conserve and enhance elements which contribute to the significance of the Stockton and Darlington Railway and its setting, including its trackbed and branchlines, will be supported.

~~Any proposal for development on or within 50 metres of the Stockton and Darlington Railway trackbed, including the branchlines (as indicated on the Policies Map) must~~ Proposals will be supported where they include measures that preserve any physical remains along the route, include site interpretation ~~aid their interpretation on site~~ and where appropriate reinstate a legible route where those remains no longer exist.

Development proposals that ~~would~~ support ~~prejudice~~ the development of the S&DR as a visitor attraction will be encouraged~~refused~~.

~~Any proposals for development of a heritage asset associated with the S&DR must be informed by any research undertaken as part of the Heritage Action Zone, and subsequent planning documents, adopted by the Council.~~

9.2.2 Where a development is on or within 50 metres of the trackbed, or relates to a designated or non-designated heritage asset associated with the route, The 1825 Stockton and Darlington Railway: Historic Environment Audit should inform proposals and accompanying Heritage Statements and Heritage Impact Assessments.

9.2.3 In partnership with Historic England, Durham County Council, Stockton Borough Council and other key stakeholders, the Stockton and Darlington Railway Heritage Action Zone initiative (2018-2023) will provide greater understanding of significance through historic area assessments, historic

[30] As defined in paragraph 194 b) of the NPPF

buildings assessments and archaeological investigations. Proposals for development associated with the S&DR must be informed by any research undertaken as part of the Heritage Action Zone, and subsequent planning documents, adopted by the Council.

9.2.4 The Council, with it partners, will develop further planning guidance, including a Conservation Management Plan, to ensure the protection, enhancement and promotion of this locally distinct and nationally significant heritage asset in advance of the 2025 bicentenary celebrations.

9.2.5 It is the long term aspiration to create a walking and cycling route along the full 26 mile route of the Stockton and Darlington Railway along with providing associated interpretation, opening up the route for leisure and tourist visits, and as an education resource.

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APPENDIX 3

Other recommended changes to the Local Plan:

Number	Title	Action/change to be made	Reason for change
WHOLE DOCUMENT			
Whole document	n/a	The following policies will be highlighted as strategic policies within the Local Plan as required under the revised NPPF 2018: • SD 1 - Presumption in Favour of Sustainable Development • SH 1 - Settlement Hierarchy • DC 1 - Sustainable Design Principles and Climate Change • DC 2 - Flood Risk and Water Management • H 1 - Housing Requirement • H 2 - Housing Allocations • H 3 - Development Limits • H 5 - Affordable Housing • H 6 - Rural Exceptions • H 7 - Residential Development in the Countryside • H 10 - Skerningham Strategic Allocation • H 11 - Greater Faverdale Strategic Site Allocation • E 2 - Employment Allocations • E 3 - Darlington Farmers Auction Mart Relocation • E 4 - Economic Development in the Open Countryside • ENV 1 - Protecting, Enhancing and Promoting Darlington's Historic Environment • ENV 2 - Stockton and Darlington Railway • ENV 3 - Local Landscape Character • ENV 4 - Green and Blue Infrastructure • ENV 7 - Biodiversity and Geodiversity and Development • IN 1 - Delivering a Sustainable Transport Network • IN 2 - Improving Access and Accessibility • IN 6 - Utilities Infrastructure • IN 9 - Renewable and Energy Efficient Infrastructure	To reflect the requirements of the revised NPPF.

Number	Title	Action/change to be made	Reason for change
		• IN 10 - Supporting the Delivery of Community and Social Infrastructure	
Whole document	n/a	Update paragraph reference to the NPPF in the Local Plans main text, footnotes and appendices to reflect the revised NPPF 2019.	To reflect the revised NPPF.
Numbering and bullet points in policy text	n/a	Make changes where necessary to ensure consistency in the use of numbering, letters and bullet point in policy and supporting text.	To ensure consistency across the document and enable clear referencing in reports and decision notices.
Whole Document	n/a	Change references to 'Durham Tees Valley Airport' to 'Teesside International Airport'	Airport formally renamed.
INTRODUCTION			
1.2.	Overview of the Borough	Update of figures and stats within the section	Update for accuracy
1.2.	Overview of the Borough	Inclusion of Tees Valley map showing the Borough with boundaries of nearest neighbours	Inclusion of Darlingtons location within Tees Valley Added value
1.4	Local Context	Update of strategic employment development locations in line with Key Diagram	Accuracy
Introduction		Introduction updated to reflect changes in position to the Proposed Submission Local Plan.	Update for clarity.
Figure 1.2		To be updated with latest timescales.	Accuracy
VISION, AIMS AND OBJECTIVES			
SUSTAINABLE DEVELOPMENT			
THE SETTLEMENT HIERARCHY			
4.0.#	Settlement Hierachy	Statement Boxes removed and integrated into the wording of Policy SH 1.	Clarity over status of 'Statement' boxes and also content was policy.
SH 1		Insert 'including' in front of policy list.	Clarity
	Statement	Additional 'Darlington Urban Area' statement to be provided summarising key points of paragraphs 4.0.3 to 4.0.8	Consistency with approach for hierarchy setout in Policy SH 1.
DESIGN AND CONSTRUCTION			
Policy DC 1	Sustainable Design Principles	Include requirement for BREEAM standards on Non-residential development. Insert point :	To reflect Design of New Development SPD requirement which needs continuation.

Number	Title	Action/change to be made	Reason for change
		'Non-residential buildings of 1,000 sqm floorspace or more will be required to meet BREEAM 'Very Good' standard.' And: Change wording to *'Good design is required to create attractive…… Good design will help to reduce carbon emissions and increase the resilience of developments to the effects of climate change.'* g. Delete 'where possible' h. 'Proposals for development on land affected by contamination will be permitted where the applicant can demonstrate that the site is suitable for the proposed use and development will not result in unacceptable risks to human health or the environment.' *'Proposals will be permitted where it can be demonstrated that the principles of good design have been followed. In meeting the above, reference should be made to the Borough Council's relevant design guidance documents.'*	To enhance climate change credential in design of commercial properties. Clarity Clarity Uneccesary repetition
5.1.10		Change sentence to read: 'Although the Code has been passed out…'	To reflect current policy position.
5.2.7		Needs a paragraph number and should read: 'There are a number of …..'	Formatting error.
Policies DC 2 to DC 4	Health and Wellbeing, Safeguarding Aminity and Flood Risk & Water Management	Order swapped of policies swapped.	Greater Clarity in document. Flood Risk and Management Policy needed to be earlier in the section.
Policy DC 2	Health and Wellbeing	d. ~~develop neighbourhoods and centres that~~ ensuring that new developments:-	Policy reworded partly to reflect comment DBDLP 1411 but mainly for greater effectiveness and consistency with NPPF.

Number	Title	Action/change to be made	Reason for change
		• are age friendly, inclusive, safe and attractive, and easily accessible on foot or by bicycle. Where appropriate this should integrate dementia friendly design principles; • have a strong sense of place which encourages social interaction; • ~~integrate dementia friendly design principles, including benches and landmark features~~; • are designed to promote active travel and other physical activity~~;provide access to a range of facilities including transport, health and sport and leisure facilities;~~ • ~~are designed to promote physical activity,~~ through the arrangement of buildings and uses, access to open space and landscaping~~, and the provision of facilities to support walking~~. • promote improvements and enhance accessibility to the borough's greenspaces and green infrastructure corridors; • ~~improve air and water quality, and reduce noise within the main urban area;~~ • ~~ensure development does not have an adverse impact on the environment or residential amenity through air, noise/vibration, soil, surface and goundwater pollution;~~ • All new development that may cause groundwater, surface water, air (including odour), noise or light pollution either individually or cumulatively will be required to incorporate measures to prevent or reduce their pollution so as to not cause unacceptable impacts on the living conditions of all existing and potential future occupants of land and buildings, the character and appearance of the surrounding area and the landscape; • require, in the case of development of 100 or more homes, the submission of a Health Impact Assessment (HIA)(6)as part of the application to explain how health considerations have informed the design.	
Policy DC 3	Safeguarding Amenity	Delete reference to ‘Unpleasant’ emissions	Unnecessary subjective consideration
5.3.3		Delete reference to ‘Unpleasant’ emissions	Unnecessary subjective consideration

Number	Title	Action/change to be made	Reason for change
5.3.4		Conflicts between neighbouring developments can often ~~generally~~ be avoided by careful design, siting and orientation of buildings and spaces, paying particular attention to those aspects which are most likely to cause issues, e.g. ~~car parks~~ roads and railways, service yards, bin stores and noisy equipment, plant and operations and which are most sensitive to their effects, e.g. ~~children's play areas~~, recreational areas, outdoor amenity spaces or habitable rooms. Planning conditions can also be used to mitigate and reduce to a minimum adverse impacts and to control for example ~~deal with matters such as the installation of extraction systems,~~ hours of operation and delivery times, as well as to secure any required mitigation or preventing a development from changing its character in a detrimental way. The visual impact and sustainability of any mitigation measures for example acoustic barriers should be considered by developers and applicants. In terms of new housing developments affected by noise justification of how the development has been designed to minimise noise intrusion from environmental sources should be provided and how required internal and external noise levels will be achieved.	Improved clarity of relevant considerations.
5.3.7		DELETE	Construction management conditions are attached to planning permissions.
5.3.8		Certain development is permitted under national 'permitted development' rights' with the exception of prior approval. In such circumstances with the exception of prior approval, impact on amenity is not a consideration as development of this scale is deemed to be minor in scale. Where there is clear justification to do so, permitted development rights may be removed to protect local amenity and minimise impacts on health and quality of life~~. or the wellbeing of the area.~~ In assessing impacts on health and quality of life and in looking to ensure a good standard of amenity the Council will have regard to	Further clarification as to when the policy would apply and provide links to other material considerations.

Number	Title	Action/change to be made	Reason for change
		Government and other appropriate guidance on the assessment of matters which are material planning considerations.	
Policy DC 4		g. *'delete 'where appropriate'.* Change to *'Where required, the incorporation of SuDs must……'* Change *'For development on previously developed land, ……..'* *'For development on greenfield land……'*	To provide greater clarity.
HOUSING			
Policy H 1	Housing Requirement	Add a section outlining the housing requirement for the designated neighbourhood areas based on spatial distribution of housing allocations.	To accord with para 65 of the NPPF (2019)
	Housing Requirement / Housing Land Supply	Update reasoned justification to include standard method for calculating housing need, new minimum housing requirement and new 5% buffer to five year land supply.	To align with national policy.
Table 6.1	Expected Housing Delivery	Update to reflect latest trajectory.	Accuracy
Table 6.2	Spatial distribution of housing allocations	Update to reflect new percentages following removal of sites.	Accuracy
Policy H 2 Table 6.3	Housing Allocations	Site 244 Lingfield Point East remove and add site 355 Lingfield Point to table 6.4 Housing Commitments.	Removes existing site duplication and to reflect remaining area of outline planning permission.
Policy H 2 Table 6.3	Housing Allocations	Where new site information has become available update site yields where required and update yields by and after 2036 to reflect changes in housing trajectory.	To reflect current site information.
Policy H 2	Housing Allocations	Identify 6 strategic sites in the Table: 20 Great Burdon 41 South Coniscliffe Park 185 Greater Faverdale 243 Snipe Lane, Hurworth Moor 249 Coniscliffe Park North	To identify strategic housing/mixed use sites.

Number	Title	Action/change to be made	Reason for change
		251 Skerningham	
Para 6.2.13		Update figures on total numbers from housing allocations.	To reflect changes to table 6.3
Policy H 2 Table 6.3	Housing Allocations	Two new sites to include: • Site 411 - Chesnut Street Car Park • Site 412 - Skinnergate	Additional urban brownfield allocations incorportated into proposed housing allocations
Table 6.4	Housing Commitments	Remove completed sites and update remaining dwellings and dwellings to be completed pre 2036 (remove completions for 2018/19).	To reflect current site information and changes to trajectory.
Table 6.4	Housing Commitments	Add site 34 Beech Crescent West, Heighington to the table, drafting error, previously missing. Also add new sites with planning permission to the table including, 372 Fenby Avenue Phase 2, 394 Lakeside, The Old Brickworks, 395 Dr Piper House, King Street, 402 West Park Flats, 405 Land Land West of 153 East Mount Road, 406 Northern Echo Building and 407 Barton Street.	Previously missing site and new commitments.
Paragraph 6.2.18, 6.2.19 and 6.2.20		Paragraphs on housing delivery test to be removed.	Test will be ongoing so no need to include in plan as will quickly be outdated.
Policy H 4	Housing Mix	Alter the category 2 requirement (accessible and adaptable dwellings) to 80% of all new dwellings and category 3 to 9% of all new dwellings. Amend the penultimate sentence of the policy to read: To increase housing options, the Council will <u>encourage and</u> support the delivery of custom and self-build housing. The Council will monitor the demand for this type of housing and will assist in the delivery of sites where appropriate. ~~Applicants will be encouraged to incorporate custom and self-build plots.~~	To reflect the latest evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities. Greater Clarity.
Policy H 5	Affordable Housing Table 6.5	Location (Wards) Whinfield ; to switch from Affordable Requirement 30% **to 20%**	In accordance with the Local Plan Viability assumptions set (Accuracy)
Policy H 5		Reword ‘Affordable housing will normally be provided on site alongside market housing to create balanced communities. As such,	For Greater Accuracy

Number	Title	Action/change to be made	Reason for change
		the affordable housing should be distributed across the site in small clusters of dwellings.	
Policy H 5 & para 6.5.3	Affordable Housing	Alter threshold in the policy to 10 or more.	To accord with updated guidance within the NPPG.
Policy H 6	Rural Exceptions	Amend the final paragraph to read: 'In exceptional circumstances, a small proportion of market or self/custom build housing may be provided, if it can be demonstrated via a detailed viability assessment that a 100% affordable scheme would be unviable and the market homes would support delivery.'	To promote the need for self/custom build as part of rural exceptions.
Para 6.5.2		Update figures in paragraph.	Accuracy.
Para 6.5.5, 6.5.6 & 6.5.7		Removed text on starter homes.	Now out of date, not required as affordable housing definition has been updated.
Policy H 7	Residential Development in the Countryside	Rewording - New isolated dwellings in the countryside will be avoided. New permanent dwellings will only be permitted where they meet criteria set in national Policy (Para 79, NPPF 2019).	On inspectors advice to ensure consistency with national policy.
Policy H 9	Gypsy and Travellers Accommodation	Add criteria b) - "Safeguarding of dedicated smaller Gypsy and Travellers Sites" as an addition to the two existing	To include omission of safeguarding smaller G+T sites
Policy H 10	Skerningham Strategic Allocation	Reword "A centrally located and well connected neighbourhood centre providing supporting local community facilities including a health hub, clustered with other facilities and services to meet the day to day needs of residents, education, employment opportunities and retail facilities. These facilities should be of a scale and type proportionate to the nature of the development;" Removed word 'on-site' from end of sentence -Space for two primary schools, associated nursery provision (a total of 5.6 hectares) and a reserved space for a secondary school (5 hectares); Removal of word ' sufficient' - A local distributor road between the A167 and A1150, close to the Little Burdon roundabout, which is to include a crossing of the East Coast Mainline and a corridor to enable the provision	Break up sentence for greater clarity. To prevent repetition To prevent ambiguity

Number	Title	Action/change to be made	Reason for change
		of a connection across the River Skerne to the Northern Relief Road route. Removal of Footnote - Other necessary infrastructure as required by the Infrastructure Delivery Plan. To be published alongside the Proposed Submission Local Plan. and identified at the time of submitting a planning application; Removal of wording at end of sentence - retains and enhances the network of safe, attractive and accessible public rights of way, footpaths and cycle routes across the site; Added to Policy H11 (Faverdale)- protects the amenity of existing residential properties (see Policy DC 3); Requirement copied in from Policy H11 (Faverdale) - mitigates the impact on biodiversity (see Policy ENV 7); Criterion a amended to read: A mix of housing types, tenures and sizes, including affordable <u>and self/custom build</u> housing, informed by up-to-date evidence of the housing needs of the Borough and Policies H 4 and H 5, with higher densities being incorporated close to public transport routes and neighbourhood centres;	Not necessary To avoid repetition For consistency and is needed for this policy For consistency and is needed for this policy To increase self/custom build options.
Figure 6.1	Skerningham Masterplan Framework	Change site boundary label to – Skerningham Masterplan Area	To accurately reflect the purpose of the figure.
Policy H 10	Skerningham Strategic Allocation	Replace paragraph 6.10.14 of the supporting text with the following: <u>'The site contains the Grade II Listed Skerningham Farmhouse, which was the home of the noted cattle breeder Charles Colling, and Low Skerningham cottage and stable. The site is adjacent to the Ketton Bridge Scheduled Monument, and close to heritage assets in and around the villages of Great Burdon and Barmpton. It is therefore necessary that the design and layout of development on the site conserves and enhances the significance of these assets and the contribution their rural settings makes to their significance in line with</u>	To reflect the outcome of the Heritage Impact Assessment.

Number	Title	Action/change to be made	Reason for change
		Policy ENV 1 and national policy. Also present on the site is the potential location of the deserted medieval village of Skerningham (indicated on Figure C.1: Area of High Archaeological Potential) and a burial site. Historic field boundaries should also, wherever possible, be maintained. Development should retain and incorporate the World War II pillbox in the southwest area of the site, as well as preserve some, if not all, of its original intended views within the landscape. Improving interpretation and accessibility to this historic asset could increase it overall communal value and significance. Under the provisions of Policy ENV 1, development proposals on the Skerningham Strategic Allocation must be accompanied by an archaeological evaluation report. Development proposals will need to consider an appropriate programme of targeted archaeological evaluation and mitigation, in particular around the site of the posited Skerningham Deserted Medieval Village, previously demolished historic buildings, and other earthworks as identified in the Historic Environment Record'.	
Policy H 11	Greater Faverdale Strategic Allocation	Include SUDS as a policy requirement	In line with Skerningham
Policy H 11	Greater Faverdale Strategic Allocation	Included extra sentence on the end - Residential areas with a mix of housing types, tenures and sizes, including affordable housing, for approximately 2,000 homes. This is informed by up to date housing needs for the borough and policies H4 and H5; Reworded - Space for a well located and connected neighbourhood centre providing supporting community facilities, including the potential for a health hub, primary school and local retail facilities of a scale and type proportionate to the nature and scale of the development;	For consistency with H10 Skernignham policy wording. For consistency with Policy H10 Skerningham Includes how the buffer zone will be informed

Number	Title	Action/change to be made	Reason for change
		Reword - An appropriate buffer zone alongside the A1(M) for noise attenuation which is to be informed by a noise assessment; Reword - Principle vehicle accesses from Rotary Way and Burtree Lane; Removed previous sentence and replaced with section e of Policy 10 (Skerningham) An integrated transport network focused on sustainable transport modes; including public transport, walking and cycling with strong links to adjoining communities, employment locations and Darlington town centre; Criterion a replaced with the following to ensure consistency with wording in the two strategic allocation site policies: A mix of housing types, tenures and sizes, including affordable and self/custom build housing, informed by up-to-date evidence of the housing needs of the Borough and Policies H 4 and H 5, with higher densities being incorporated close to public transport routes and the neighbourhood centre;	Change first word to principle to match Policy H10 Skerningham For consistency with policy H10 Skerningham For consistency with policy H10 Skerningham and to increase options for self/custom build plots.
Figure 6.3	Greater Faverdale Masterplan Framework	Change site boundary label to – Greater Faverdale Masterplan Area Masterplan Boundary to be amended to fit Site 185.	To accurately reflect the purpose of the figure.
Policy H 11	Greater Faverdale Strategic Allocation	Add the following text to the policies supporting text: 'In line with the recommendations of the Heritage Impact Assessment*, development proposals should avoid dense development around the Grade II listed manor house ruins and wall south east of Whessoe Grange Farmhouse in order to preserve its original rural landscape context. Opportunities to improve accessibility to and interpretation of the site as part of the development whilst preserving the most significant elements of its setting should be considered. In addition, areas of dense development should be avoided to the immediate south of High Faverdale Farm preserving prominent views of the farmhouse.	To reflect the outcome of the Heritage Impact Assessment.

Number	Title	Action/change to be made	Reason for change
		Development proposals should incorporate the route of the Stockton and Darlington Railway, providing improved access and interpretation, and aim to avoid creating a continuous area of urban development with the permitted development to the east of the rail line in a predominantly rural setting. An appropriate programme of targeted archaeological evaluation and mitigation in advance of groundworks will be necessary, in particular around the site of the posited Whessoe Deserted Medieval Village, Roman Faverdale site and the Stockton & Darlington Railway. *Darlington Local Plan Proposed Allocation Sites: Heritage Impact Assessment, Solstice Heritage, 2019.'	
EMPLOYMENT FOR ECONOMIC GROWTH			
Policy E 2	Promotion of New Employment Opportunities	Alter policy title to Employment Allocations	To provide clarity.
Policy E 2	Promotion of new Employment Opportunities	Amend table 7.3 and 7.4 sizes (to the same format)	Accuracy and vision impact
Policy E 1 E 2	Identification of Strategic Employment Sites	Identify 5 as 'Strategic sites' in Tables: 185 Greater Faverdale 368 Central Park South 356 Ingenium Parc 367 Link 66 / Symmetry Park	NPFF 2018 guidance to identify strategic employment sites
Table 7.1.	Overview table of available employment land	Table to be updated to reflect latest proposals.	Accuracy based on changes of sites and status
Table 7.2	E1	Move Site 367 (now called "Link 66 / Symmetry Park" to Policy E1.	Site now part developed
Table 7.3 / 7.4.	E2	Amend Site 361 tio be replaced by 404 (DTVA North (Revised)	Sizes 404 adapted due to TVCA ownership ambitions

Number	Title	Action/change to be made	Reason for change
Policy E2	Employment Allocations (Strategic Policy)	Reword-The following sites, as shown on the Policies Map, are allocated for new employment. Within these areas, planning permission will be granted in line with the 'suggested uses' of each site setout below. Proposals for other employment uses not falling within the 'suggested uses' of specific sites will only be permitted where the Borough Council is satisfied that they will not have detrimental effect on the amenities of the occupiers of adjoining or nearby properties or prejudice the development of adjacent sites.	To provide greater clarity on the uses for the employment sites.
Policy E3	Darlington Farmers Auction Mart Relocation	Rewording - The Policies map shows the site where the Darlington Farmers Auction Mart is to be relocated and where ancillary and related uses for rural economic development will be allowed, including:	Added ‘including’ to end of sentence for better flow into the next section.

Number	Title	Action/change to be made	Reason for change
Policy E4	Economic Development in the Open Countryside	Remove - Rural enterprises other than of minerals, waste and renewable energy proposals will normally be permitted, provided it can be shown that an open countryside location for such a development will not cause significant harm to the countryside, or it is subsidiary to or related to a main agricultural use or other land based rural business and is necessary to sustain the agricultural holding or other rural land based business as a whole.	Sentence too convoluted
		Moved Up - ***A) Proposals for the conversion and re-use of buildings for economic development in the open countryside should:*** a. Be largely accommodated within the existing building(s), (if buildings are sympathetic to their surroundings or can be made so, without significant demolition or rebuilding) and; b. Make use of retained features that contribute to local distinctiveness or historic interest if appropriate; c. The building should be large enough to be converted without the need for additional buildings and substantial new extensions will not be permitted. Any extensions that are required must be: i. subordinate in scale and proportion to the original building; ii. capable of conversion without significant alteration; iii. not prejudice any viable agricultural operations on an active farm unit; iv. be in keeping with it's surroundings; and v. not unacceptably affect amenity.	Flows better with the next paragraph – Following paragraph is a further explanation of points included in 'A'
		Rewording - Make use of retained features that contribute to local distinctiveness and historic interest if appropriate;	Changed or to and to ensure proposal contributes to both
		Reword- The building should be large enough to be converted without the need for additional buildings and substantial new extensions will not be permitted. Any extensions that are required must be:	Removal of 'the building should' to continue on from heading coherently
		Reword -There must be adequate land and for commercial uses, adequate off-road riding facilities available safely nearby for the number of horses to be kept on the land; and	Include the word proportionate to provide clarity that the amount of land facilited must be appropriate, in accordance with the measure of horses to be kept on land

Number	Title	Action/change to be made	Reason for change
		Removal of word adequately before 'protects water courses' - The proposal, either on its own or cumulatively, taking account of any other horse related uses in the area, is compatible with its surroundings and protects water courses, groundwater and the safety of all road users. Reword start of sentence - New or extensions to existing sites for static and touring caravans, chalet type accommodation and camping should be sited and screened through topography and/or vegetation in order to minimise visual impact. The materials and colours of the chalets or static caravans and associated site services and infrastructure should blend with its surroundings. All sites should have good access to the road and footpath network and will be subject to conditions to prevent the permanent occupancy of the site. – Removal of 'new or extensions….' Rewording of paragraph - "Where possible and appropriate, existing buildings including designated or non-designated heritage assets shall be retained and re-used. Any necessary new buildings must be well-related to existing buildings. The character, scale and design of the proposal should be appropriate to its open countryside surroundings and there should be satisfactory access from the road network. Proposals must not prejudice any planned community use. Proposals that demonstrate that they will directly and significantly contribute to the retention and / or development of local services, community facilities and infrastructure will be supported."	Prevents ambiguity To improve the flow of the sentence Breaks up sentence for greater clarity To provide clarity that existing designated and non designated heritage assets, in particular, should be retained and re-used.

Number	Title	Action/change to be made	Reason for change
TOWN CENTRE AND RETAIL			
Section 8.1.5	Town Centre boundary	The definition of Town Centre tested and approved by two Town Centre Conference events.	
TC1	Town Centre	Extra section to strengthen the flexible use of space in the Town Centre under PDL and Flexible change of use for residential. 8.1.6 The submission Local Plan supports in particular the change of use in appropriate sites into residential development within the Town Centre boundary. PDL rights and a flexible approach to change of use (footnote: as recommended in the NPPF 2019 sec 85. f) will enable residential development in the Town centre to retain the vitality enhance vibrancy.	Strengthening of NPPF 2019 (Enhance TC Vitality and Vibrancy through residential use in the Darlington Town Centre
TC1	Darlington Town Centre Boundary	Rewording - Darlington Town Centre The Darlington Town Centre Boundary identifies the area within which main town centre uses should be located. As setout in national policy the Council applies a "Town Centre First policy" which requires a sequential test to be carried out to locate main town centre uses: 1st: Within the Town Centre Boundary 2nd: Edge of the Town Centre Boundary 3rd: Out of Centre Wording and Title Changed	For consistency of wording with national policy.
Policy TC2	Primary Shopping Area	Change wording to “The Policy Map defines the Primary Shopping Area within the town centre.” Changed from flexibly to appropriate – “To maintain vitality and viability, the Council will permit non-retail uses in shopping frontages where appropriate. “ Change “some” to “the following” - However within the development proposals the following criteria should be considered:	Removal of ‘town centres primary shopping area for better reading. To prevent ambiguity To prevent ambiguity

Number	Title	Action/change to be made	Reason for change
		Removal of “of and” – “its position and attractiveness within the frontage”	Improve flow of sentence
		Changed “and” to compared” and added “relative” – a. The relative pedestrian flow associated with the unit compared with the wider centre;	To prevent ambiguity
		Moved paragraph to above the Policy box and reworded: The policies in this Local Plan acknowledge the need to be flexible where appropriate and the changing role of town centres, which are no longer solely a shopping destination, but provide a range of other leisure and social functions including housing and the use of upper floors.	Not needed as part of Policy. To improve flow of sentence.
		Rewording of – “The Council will support the regeneration of the Commercial / Kendrew Street site providing the following has been considered:”	To provide further clarity that the development proposals should consider the points in this section. For accuracy
		Removal of the word ‘Scheme” - That any comparison and convenience retail element of the scheme are central and complementary to the wider regeneration of the Town Centre;	For further clarity
		Rewording of “innovative way”, replaced by minimizes surface car parking- Sufficient and appropriate provision is made for replacement vehicle parking, which minimizes surface car parking, to support the scheme;	To avoid repetition
		Removal of “complement Darlingtons Transport Network” - Development should incorporate suitable linkages to the existing transport network and help mitigate issues of potential traffic congestion;	

Number	Title	Action/change to be made	Reason for change
TC4	District and Local Centres	Reword TC4 to: *The boundaries of the District and Local Centres are identified on the Policies Map.* • *Cockerton (District Centre)* • *Mowden (Local Centre)* *Types of uses that will be acceptable within the boundaries include shops, financial services, restaurants and cafes, drinking establishments, hot food takeaways, and a range of community and leisure facilities (included within classes A2-A5, D1 and D2 of the Use Classes Order) so long as they:* *a. Are physically integrated with the rest of the centre; and* *b. Will ensure the vitality and viability of the centre is maintained.*	For greater clarity of wording.
ENVIRONMENT			
Policy ENV 1	Safeguarding the Historic Environment	The following paragraph has been added to the supporting text to Policy ENV 1: 'A Heritage Impact Assessment has been produced to inform the Local Plan that assesses the suitability of a number of allocation sites from an historic environment perspective. Design and mitigation measures recommended by the assessment have been incorporated into the development criteria contained in APPENDIX B HOUSING AND EMPLOYMENT ALLOCATION STATEMENTS and the policies for the Skerningham and Greater Faverdale strategic allocations.'	To reflect the comments from Historic England.
Policy ENV 4	Green Infrastructure	The following statement has been added to the supporting text to Policy ENV 4: 'Applicant's seeking to justify the loss of an existing green space on the grounds that there is a surplus of that type of green space in the area (under Policy ENV 4 criterion F i.) will also need to demonstrate that its loss would not have an adverse affect on the wider recreational needs of residents. This consideration will include whether the land could be redesigned to serve an alternative green space function that would help to meet local shortfalls in a particular type of green space.'	To provide some more clarity on what is expected of applicant's seeking to justify the loss of green space under criterion F i.

Number	Title	Action/change to be made	Reason for change
Policy ENV 4	Green Infrastructure	Criterion F i has been amended as follows: '..type of green space ~~infrastructure~~ in the area…'	To correct the definition used.
Policy ENV 6	Local Green Space	The following sites have been added to the list of Local Green Spaces under Policy ENV 6: LGS22 - Tower Hill to The Front Middleton One Row LGS23 - Field to the East of Middleton Lane, Middleton St George	New sites submitted to the Council for assessment and considered to meet the criteria required for designation as a Local Green Space.
Policy ENV 7	Protecting and Enhancing Biodiversity and Geodiversity	The following new text has been added to the start of paragraph 9.6.1: 'The Government published A Green Future: Our 25 Year Plan to Improve the Environment in 2018 that seeks to, amongst other measures, embed an 'environmental net gain' principle for development and promotes taking a natural capital approach to conserving and improving the natural world.'	To make reference to Government's 25 Year Environment Plan.
Policy ENV 7	Biodiversity and Geodiversity and Development	The fifth paragraph of Policy ENV 7 has been amended to read: 'Within the areas listed below~~, as identified on the Policies Map,~~ specific actions will be taken as follows:'	To reflect the fact that not all of the areas are identified on the Policies Map.
Policy ENV 8	Assessing a Developments Impact on Biodiversity	The first sentence of the second paragraph to Policy ENV 8 has been amended to read: 'Where a development has a negative impact on biodiversity ~~and/or geodiversity~~ following…'	To reflect the fact that this policy relates to the assessment of a developments impact on biodiversity, and not geodiversity.
Policy ENV 8	Assessing a Developments Impact on Biodiversity	The following sentence has been added at the end of Policy ENV 8: 'Where significant harm resulting from a development proposal cannot be avoided, adequately mitigated, or, as a last resort compensated for, planning permission will be refused.	To better reflect the provisions of paragraph 175 a) of the NPPF.
TRANSPORT AND INFRASTRUCTURE			
10.0.1		Change last paragraph to read: 'The majority of new residential, commercial and employment development is therefore guided to the main towns and larger villages and sustainable methods of transport will be prioritised.	To reflect the NPPF prioritisation of sustainable transport methods.
Policy IN 1	Delivering a Sustainable Transport Network	Point e) change wording to: *'Protecting and enhancing public rights of way……'* New point f) for *'Identification and creation of a route….'*	To be consistent with planning practice guidance.
10.1.3	Transport for the North	Update paragraph to reflect most up to date position on the TfN Strategic Transport Plan.	Update latest position.
Policy IN 1	Point ii:	Reword to:	Improved links to evidence.

Number	Title	Action/change to be made	Reason for change
		Supporting the development of the 'Strategic' priority corridors identified within the Tees Valley Local Cycling and Walking Infrastructure Plan and safeguarding their routes from development which would impair their functioning for pedestrians and cyclists to access employment opportunities, schools, shops and other community facilities;	
Policy IN 1	Point v:	Reword to: Protecting and enhancing public rights of way as set out in the Rights of Way Improvement Plan, 'Local Green Corridors' identified in the Darlington Green Infrastructure Strategy and links to long distance routes such as the Teesdale Way and NCN 14.	Improved links to evidence.
Policy IN 1	Point C) iv	Add: ……..new bus routes and bus stops	For reater clarity of requirements
Policy IN 1	Point C) viii	Delete	New Tees Valley bus strategy being developed.
10.1.19	Walking and Cycling	Add: Local Green Corridors identified ……in the Tees Valley Local Cycling and Walking Infrastructure Plan, Rights of Way Improvement Plan and ……	Links to relevant documents
10.1.27	Creating a more efficient rail network	Add: ….and the line capacity for local, regional national services. This will support the increased movement of people….. c. • Public realm Improvements from town centre to Darlington Station ~~Lack of car parking at Dinsdale Station.~~	Clarify differnent levels of links Update priority work areas.
10.1.29	Road Network	Whilst the Local Plan has been developed on the basis of ensuring that developments are in locations where sustainable transport options are available, or can be made available, some people will	Additional text for clarity.

Number	Title	Action/change to be made	Reason for change
		inevitably choose to access employment and key services by car. It is therefore important that the road network is managed in a way that ensures that it continues to function in an efficient manner, facilitates our aspirations for economic growth and accommodates the needs of pedestrians, cyclists, public transport users and other highway users.	
10.1.31	Sustainable Road Network	Delete reference to 'transport strategy' and replace with 'Strategic Transport Plan and the Local Implementation Plan'	Update on relevant documents
10.1.35	Strategic Road Network	Initial work suggests that improvements can be largely accommodated within the existing highway network or on land in the ownership of the relevant highway authority, so it is not proposed to safeguard any land for them. The Council has been working closely with Highways England to identify the pressure points on the Strategic Road Network, potential improvements and consider funding options, including contributions from developers.	To clarify role of Highways England in plan production.
10.1.36	Strategic Road Network	A long term improvement to the strategic road network is being pursued by a number of partners including TVCA, Transport for the North and the Borough Council to provide improved connectivity along the A66 corridor. As part of these improvements a new Darlington Northern Link Road has been identified to support the Tees Valley SEP. The route would connect the A66 at Little Burdon Roundabout to Junction 59 of A1(M) and a Strategic Outline Business Case will be submitted to DfT in the early part of 2020. The route is not yet fixed and will not therefore be safeguarded within the Local Plan. The Local Plan is not reliant on the delivery of this route and the traffic modelling supporting the Local Plan assumes that the route is not in place.	Update on latest position with potential Northern Link Road.
10.1.37	Local Highway network extensions and improvements	Add: 'Some improvements have already been secured or are in the process of being built.'	Greater Clarity.
10.1.38	Local Highway network extensions and improvements	West Park Link Road and Symetery Park Links moved to separate 'delivered' list.	Progress Update
10.1.44	Local Plan Highway Modelling	Replace Paragraph with:	Latest Update on strategic model.

Number	Title	Action/change to be made	Reason for change
		The strategic modelling assessment confirmed that the areas of key change would be: • The eastern area and associated A1150 East-West corridor where the short term economic development sites are located; • The western area including the A68 West Auckland Road corridor; • The northern area including A167 North Road corridor and associated A1150 East-West corridor; Radial corridors such as Haughton Road and Yarm Road for access to the town centre; and • Longer term issues beyond 2035 related to the Garden Village developments to the north of the town and the background traffic growth on the A1150 and A66 corridors.	
10.1.47 10.1.49 10.1.50	Local Plan Highway Modelling	Delete paragraphs.	To reflect latest model results.
10.1.51		From this strategic model, travel demands have been extracted for more detailed analysis within the local microsimulation models that investigate the impact of Local Plan trips and evaluate the planned mitigations in more detail. These comprised:- • A66 Eastern Darlington Model • North Darlington Aimsun Model • A68 Western Darlington Model 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.	To reflect latest model results.
Policy IN 2	Improving Access and Accessibility	Point a) to read: 'provide accessible and safe walking and cycling…'	To be consistent with planning practice guidance.
Policy IN 2		Add:	To ensure policy is effective

Number	Title	Action/change to be made	Reason for change
		….400 metres walking distance of a bus stop served by a regular service.	
Policy IN 2		Change wording to: e. All new development (excluding extensions) should include secure cycle storage facilities to encourage cycle travel and employment uses should accommodate secure cycle storage and where possible, changing and shower facilities. f. Contributions will be sought from all developments, where considered appropriate, for the following sustainable travel measures: • Provision of regular bus services and infrastructure in locations that are currently poorly served by public transport; • Safer Routes to School; • Measures to support the Travel Plan; Public Rights of Way improvements.	To provide greater encouragement to incorporate cycle storage and facilities in employment uses. To clarify range of schemes public and sustainable transport contributions will be expected to contribute to in areas of deficiency.
10.2.7		Add to end of para: In the context of Darlington's bus network a regular service is considered to be a half hourly frequency throughout the day, Monday to Saturday. Some developments may require new services or extensions to existing services to meet the minimum standard for a regular service.	To clarify what is considered a 'regular service'
Policy IN 3		Reword a) Improve transport choice through the provision of information and encouragement to maximise opportunities to travel sustainably;	For greater clarity of expectation of Travel Plan
Policy IN 4		Last Para of policy changed to read: Non-Residential development creating over 50 parking spaces are required to provide at least one double electric vehicle charge point (2 spaces). For each additional 50 parking spaces at least one double charging point will be required.	For precision and accuracy of requirements

Number	Title	Action/change to be made	Reason for change
Policy IN 9		Renewable and low carbon energy development in appropriate locations will be supported. In determining planning applications for such projects significant weight will be given to the achievement of wider social, environmental and economic benefits. a. Wind energy development will be granted planning permission if the applicant can demonstrate that the proposal will not have unacceptable impact, either individually or cumulatively upon: i. shadow flicker; ii. visual dominance; iii. protected species and habitats; iv. landscape character and fabric; v. heritage assets; vi. communication links; and vii. aviation and radar. b. Solar Power developments will be granted planning permission if the applicant can demonstrate that the following considerations have be taken into account: i. the importance of siting systems in situations where they can collect the most energy from the sun; ii. need for sufficient area of solar modules to produce the required energy output from the system; iii. the colour and appearance of the modules; iv. demonstrate effective use of land by focussing large scale solar farms on previously developed and non agricultural land; v. where a proposal involves agricultural land it has been demonstrated that: 1. the land has been shown to be poorer quality landin preference to higher quality agricultural land; and	Policy reworded for soundness and accuracy.

Number	Title	Action/change to be made	Reason for change
		2. the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around solar arrays; vi. the proposal has adequately mitigated the visual impact on the landscape and the effect of glint and glare on neighbouring uses and aircraft safety. c. Hydro Power: Applications for hydropower should be accompanied by a detailed Flood Risk Assessment. Early engagement should take place with the local planning authority and the Environment Agency. d. District Heating: Required in major development over 300 houses to be enabled for district energy connection unless demonstrated not to be feasible or financially viable to do so. Where relevant, planning applications will also need to include a satisfactory scheme to restore the site to a quality of at least its original condition once operations have ceased.	
MONITORING			
		An appropriate monitoring regime has been developed based on the recommended changes.	To ensure efficient monitoring of the plans effectiveness.
APPENDICIES			
Appendix A	Housing Trajectory	Changes made to tables 6.3 and table 6.4 above are to be reflected in the housing trajectory.	To update site information
Appendix A	Housing Trajectory	Update trajectory to include completed sites since April 2016, alter allocations which are now commitments and add new commitments. Alter delivery of sites in the housing trajectory where required; where new site information has become available. Alter tables 6.3 and 6.4 accordingly if required to reflect this.	To update site information.
Appendix B	Allocation Statements	Remove statements to sites which are now commitments and update yields on sites where required.	To reflect the latest information on sites.
Appendix B	Appendix B	Rename: Housing and Employment Allocation Statements	Inclusion of employment sites within the appendix to provide further

Number	Title	Action/change to be made	Reason for change
		Inclusion of new employment allocation sites within policy E 2, excluding Greater Faverdale which has its own detailed policy.	guidance on the issues and requirements of sites.
Appendix B	Housing & Employment Allocation Statements	Additional detail added into issues and requirements for sites from the Landscape Sensitivity of Potential Housing Sites in Darlington Borough Study (July 2019).	Additional evidence base prepared.
Appendix B	Housing & Employment Allocation Statements	Additional detail added into issues and requirements for sites from the Heritage Impact Assessment (September 2019).	Additional evidence base prepared.
Appendix C	Darlington's Heritage Assests	Correct the reference to 'Scheduled Monuments' on the first page of this appendix.	Updated for accuracy
Appendix C	Darlington's Heritage Assests	Change the reference to the NPPF in the first paragraph under the title 'Local List and Non-designated Heritage Assests' to refer to national planning practice guidance.	Updated for accuracy
POLICIES MAP			
All Maps with OS	OS Base	Replace OS Map base to a newer layer / map as current is from before 2012 (Built Housing areas not included (and e.g. old Mowden Rugby Club still visible /	Accuracy
Map 3+ 8 +10	Town Centre	Change of shape for Additional Site for Town Centre Use: TC 3 (Commercial / Kendrew street (274)	(Accuracy) Includes Shops of Primary Shopping Area on Northgate
Map 1	Key Diagram	Omit inner option (B) for: SHN Northern Link Road Potentials Route	Only show route which will be taken forward for Business Case development
Map 1	Key Diagram	Include Central Park South in Strategic Employment Sites	Correctness
Map 1	Key Diagram	Change strategic housing locations label to – Strategic Housing Locations (H2) & (H10).	Accuracy
Map 1	Key Diagram	Change strategic mixed use label to – Strategic Mixed Use Locations (H2) & (H11)	Accuracy
Map 1	Key Diagram	Change strategic employment sites label to – Strategic Employment Locations (E1) & (E2)	Accuracy

Number	Title	Action/change to be made	Reason for change
Map 3 + 6	Darlington West	Size of DFAM site increased (E3)	Correctness of site as per new Application Sept 2018
Map 6 and 3	Favedale	Masterplan Boundary to be amended to fit Site 185.	
Map 7	NE Darlington	The green area at the western end of Sparrowhall Drive has been removed from the Skerningham Strategic Allocation boundary.	To more accurately reflect the proposed allocation boundary.
Map 7 + Map 4	NE Darlington	The Elm Tree Farm site (ref 392) has been removed from within the Skerningham Strategic Allocation boundary (ref 251).	To reflect that these are two separate allocation sites.
Map 4 + 8	Mixed use site	Site 352 (Haughton Road / Barton Street) to be Mixed use development	Taken forward from Helaa 18 as Mixed Use site 27
Map 4 + 8	Mixed Use site	Include site number reference 355 into map and delete site 244 (within the shape of 355)	Ambiguity (244 now part of Mixed Use Site 355 Lingfield point) as change of ownership for Lingfield Point and application 15/01205/FUL not progressing
Map 8 + 4	Employment Allocations	Show Central Park South (ref 368) and Link 66 / Symmetry Park (ref 367) as 'Safeguarded Existing Employment Opportunities'. Site 80 East of Lingfield Point to remain as a proposed allocation.	To reflect site information.
Map 9	Local Green Space	LGS14 Boundary altered to remove greyhound exercise area.	Clarified Community woodland boundary.
Map 11	S&DR	Remove Green Dotted Line.	Outside borough
Map 13	S&DR	Stop Line at borough boundary.	Outside borough
Map 6	Existing Employment Areas	Site 345 Boundary needs updating so it doesn't overlap Housing Site 003	To avoid overlapping allocations
Map 4 +9	Employment Site DTVA North	New boundary and new site number 402	Accuracy taking into account plans of the new owners TVCA
Map 4 + 9	Employment Site DTVA South	New boundary, reduced size and new site number 404	Accuracy taking into account Findings of Heritage assessment risks and phasing plans for Site based on Masterplan and development on Stockton Borouch Councuil site

Number	Title	Action/change to be made	Reason for change
Map 9	Blackwell Green Wedge	The Blackwell Green Wedge boundary has been amended to reflect recent development that has taken place on the eastern side of Hammond Drive.	To remove the area of new development along Hammond Drive from the Blackwell Green Wedge.
Map 13	Existing Employment	Amend Boundary for DTVA North 361 to omit Housing Site 016	To avoid overlapping allocations.
Map 13	Site 375 South of High Stell and development limits.	Omit Site 375 South of High Stell. Development limits amended to reflect sites exclusion.	Site no longer proposed for allocation.
MAP 13 or Key Diagram? and Key	Airport Safeguarding areas	Safeguarding Areas for Airport will be included in Policies map rather than in Appendix D Also in Key	Combination of mapped detail
Map 14		Add in site 54 Neasham Nursery and alter development limits to include the site.	Permission given for 10 dwellings June 2019.
Map 14 & 15	Neasham, Merrybent and Low Conniscliffe development limits	Alter development limits to include permissions under construction at Neasham and Merrybent (Neasham and Merrybent Nurseries and Low Conniscliffe).	To reflect permissions under construction
Map 6 & 3	Site 1 Alderman Leach	Omit Site 1 Alderman Leach	Proposed allocation now below 10 dwelling threshold.
Map 9 + 3	Site 9 Blackwell Grange East	Omit site 9 Blackwell Grange East. Replace with new site 403 Blackwell Grange East.	More suitable site proposed for allocation.
All relevant maps	Local Green Space	Addition of new Local Green Spaces	Additions after new submissions and inclusion of sites
All relevant maps	Housing Allocations	Change colour of housing allocations which now have planning permission and should be reflected as commitments.	To reflect current site information.
All relevant maps	Housing Commitments	Remove sites which have been completed.	Not required to be shown as they are no longer delivering dwellings.

Number	Title	Action/change to be made	Reason for change
All relevant maps	Development Limits	Minor amendments to limits to reflect latest development and to rectify any drafting errors.	Accuracy of development limits.
Map 9 + 3	Development Limits	Development limits at Coniscliffe Road moved to restrict development within large gardens. Revert back to previous limits in this area. Drafting error.	Accuracy of development limits.
Appendices	Affordable Housing Requirements	Add new map showing affordable housing requirements set out in policy H 5.	Clarity
Key	Area outside the DBC	Include key to show colour for Area outside DBC or show DBC boundary	Accuracy
Key		Change promotion of new employment opportunities label to – Employment Allocation (E2)	To reflect new policy title.
Key		Change Greater Faverdale strategic allocation label to – Strategic Mixed Use Allocation (E2) & (H11)	Accuracy
Key		Change the Skerningham strategic allocation label to – Strategic Housing Allocation (H2) & (H10)	Accuracy
All relevant maps		Identify all strategic sites on the policies maps as outlined in the schedule above and distinguish between housing, employment and mixed use.	In order to identify strategic sites.
Key Diagram		Potential Northern Link Route Amended to join at A1(M) Junction 59.	Accuracy.

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APPENDIX 4

Comments Not Resulting in Recommended Changes to Local Plan

Comments can be viewed in full at www.darlington-consult.objective.co.uk/portal
Subject to member approval 'Officer Responses' will also be made available online.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Hannah Bevins	Consultant Town Planner National Grid			DBDLP129		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	No comment to the consultation after review.	No comments received	No change recommended
Gordon Pybus	Darlington Association on Disability			DBDLP251		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Accessibility statement required for plan.	Will be included as part of the Equality Impact Assessment of the plan.	No change recommended
Mrs P Burlton				DBDLP430		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Object	Object to the plan on numerous issues relating to Heritage and history of Darlington will be eroded.	General objection to the plan as a whole and its impact on heritage. Protection to heritage assets provided elsewhere in the plan and in national policy.	No changes recommended
Catrina Holland				DBDLP436		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Support	Ticked box for support	Support noted	No change recommended
Mrs jane parsons				DBDLP442		Darlington Borough Draft Local Plan 2016-2036 Consultation	Support	Support for Site 103 Roundhill Road East (Phase1) in Hurworth and the set limit for development in next 20 years	Support of the Plan in relation to 20 year impact in Hurworth noted	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
						Draft June 2018				
Mr Michael Burlton				DBDLP521		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Object	Object to the plan and specified site not identified due to heritage and historical reasons	Objection to plan noted / Site mentioned not referenced in detail	No change recommended
Mr Neil Sampling	Secretary Central Community Partnership			DBDLP547		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Plan could be further enhanced by integrating a Neighbourhood Policy N1 to the Draft Plan: 1. Identifying Urban neigbourhoods and purpose including a thresh hold of development "Development proposals, even if they are in accordance with other plan policies, will not be permitted if they cannot demonstrate that the neighbourhood within which the proposal is located is sustained or improved"	Suggestion for neighbourhood policy noted Neighbourhood plan background is included in Sec 1.7.1 and 1.7.2 Neighbourhoods are not defined in the Local Plan but should be taken into consideration in terms of Vision Aims and Objective 4.) Create Cohesive Proud & Healthy communities.	No change recommended
Stockton-on-Tees Borough Council	Stockton-on-Tees Borough Council			DBDLP726		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Support	SBC is supportive of the Draft local plan and is committed to discuss other development issues further through the next steps of the LDS.	Support noted	No change recommended
Joanne Harding	Home Builders Federation			DBDLP808		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Object	Draft Plan has not considered the whole plan Viability and infrastructure requirement so is lacking evidence.	The Draft Plan stage is not the time to produce all evidence. The Submission Stage will include those documents.	No change recommended
Miss Jennifer	Project Secretary			DBDLP869		Darlington Borough Draft Local Plan	Support	Complete representation on different subjects attached as original response	Noted	No changes recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Earnshaw	Banks Property					2016-2036 Consultation Draft June 2018				
Amy ward	Planning Manager Barratt Homes			DBDLP 1016		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Whole plan viability missing at this stage	Will be included with Submission Plan	No change recommended
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1036		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Figures used in the Draft Local Plan are illegible.	Images are compressed in some PDF download versions.	No change recommended
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1037		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Hope that comments will be taken up by Council to amend Draft Local Plan. Offer to discuss any representation of the LCMPC	Comments made on specific areas of the plan have been considered.	No change recommended
Nick McLellan	Story Homes			DBDLP 1042		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Support	Support of the Draft local Plan.	Support noted.	No change recommended
Mr Mike Allum	Durham County Council			DBDLP 1047		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Welcomes opportunity to comment at this stage but: In setting out comments below, Durham County Council would welcome further discussions on the issues raised as our evidence base develops and prior to the next stage of policy development.	Durham Council will continue to be actively engaged in the plan development process as a duty to cooperate body.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mr Derek Dodwell	Darlington Association of Parish Councils			DBDLP 1063		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	DAPC submitted a host of comments on the Settlement Hierarchy and individual PC will address local issues	Specific comments dealt with in relevant areas.	No change recommended
Ms Michelle Saunders	North Yorkshire County Council			DBDLP 1069		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	The County Council welcomes the opportunity to provide comments on the document and considers this part of the duty to cooperate. As a neighbouring authority our principle interests related to strategic cross boundary issues, as an upper tier authority, principally infrastructure.	Seen as duty to co-operate / Most issues are related to infrastructure	No change recommended
Ms Michelle Saunders	North Yorkshire County Council			DBDLP 1072		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Future discussions with NYCC welcome	Noted	No change recommended
Ms Melanie Lindsley	The Coal Authority			DBDLP 1073		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Darlington Council area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 2.33% of the Darlington area. Within the Darlington Council area there are approximately 11 recorded mine entries. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the	Comments noted and a minor impact on Darlington Borough. Land stability issues are also considered in greater detail at application stage.	No Change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required. Discussions on individual development sites welcome.		
Mr John Fleming	Gladman Developments			DBDLP 1076		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	General introduction to overall submission of Gladmans	Specific submission are further dealt with in detailed sections responses.	No change recommended
Paul Hunt	Persimmon Homes			DBDLP 1175		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Full representation of Persimmon Homes attached	Subject matters divided up to relevance to different consultation points	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 1236		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Summary of FOE comments submitted individually on Objective by David Phillips	Summary noted and taken up on individual subjects of the plan	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP 1234		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Summary paper of Dr Holroyd	Comments considered in detailed sections	No change recommended
Mr G Raistrick		Mr Joe Ridgeon		DBDLP 1237		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Object	Summary of Mr G Raistrick submission: Each Section of the Draft Local Plan will be considered in turn and all paragraph numbers referred to relate to paragraphs of that document, unless otherwise stated.	All representations are allocated to detailed sections in plan	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1201		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Object	Importance of DTVA as an economic Driver requires a separate chapter in Vision inclusion in key diagram and Policy map. In light of the above, to ensure the draft Plan, is sound DTVAL considers that the following broad modifications are required: • 'Chapter 2: Vision, Aims, and Objections' should be revised **and a specific reference should be added to highlight the importance of DTVA** and the role that it plays as an economic driver for the sub-region, and how draft Plan should seek to support the growth of the Airport and its employment generating uses. • The draft **Key Diagram** should be revised to identify the Airport 'key strategic location' for growth during the Plan period. • The draft Plan should include a **specific Airport policy,** which will promote employment generating uses at the Airport during the Plan period – see Matter 4 for further detail on the scope of this policy. This will include outlining the Airport as a Strategic Growth Location (see Appendix 1) on Policies Map.	The Airport has only recently being acquired by the Tees valley Combined Authority. The Local Authority will continue to work with the airport to explore its economical aspirations. The Plan does recognise the economic growth of the airport with employment land to the north and an employment allocation to the south.	No change recommended
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1189		Darlington Borough Draft Local Plan 2016-2036 Consultation	Neutral	Summary of responses by Turley Associates for DTVA and Peel Holding	Overall neutral on the Plan detailed issues are allocated to distinct chapters	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
						Draft June 2018				
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1299		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Government has published its updated National Planning Policy Framework (NPPF) during the consultation period on the emerging Local Plan. For the avoidance of doubt, all references to the Framework in these representations relate to the July 2018 Framework, unless specifically stated otherwise.	Comments noted	No change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1300		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Object	Raise concerns with the Local Plan viability, ability to deliver the predicted housing numbers from the proposed allocations, and consequently the need to allocate further land over the plan period. Without these matters being addressed, the Local Plan is not based on an 'appropriate strategy' to deliver the proposed Vision.	Viability for the whole plan is part of the submission draft	No change recommended
Teroton and Croft Estate		Mr Joe Ridgeon		DBDLP 1252		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Support	Strong overall support for the whole plan / notes of issues with interpretation of Plan with the new NPPF 2018 and submission date.	Support noted	No change recommended
	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP 1152		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Reasons for Barton Wilmore to act for Church Commission for England on a Site specific issue	General Comments noted and Site specific issues considered for Site 100 later in sections.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1324		Darlington Borough Draft Local Plan 2016-2036 Consultation Draft June 2018	Neutral	Summary of representation attached and taken over into detailed section based comments.	Comments noted	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mr Christopher Bell	Highways England			DBDLP882	1	INTRODUCTION	Neutral	Summary of purpose of Introduction	Noted	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP1302	1	INTRODUCTION	Neutral	Various documents is supported in the preparation of the emerging Local Plan, however, the Council must be careful not to place too much reliance on the delivery of strategic sites	Comments noted	No change recommended
Dr.- Ing. Jochen Werres				DBDLP20	1.0.1	Paragraph	Neutral	What is the relevance of the Core Strategy 2011?	Some points of core strategy have been updated but this is new plan and would replace the core strategy and any saved policies from the previous local plan.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP767	1.0.3	Paragraph	Object	statement as it defies logic / economic growth and sustainability don't go together	Growth can be developed in a sustainable manner which for example reduces the need for motorised travel. The Plan needs to be supported by a Sustainability Appraisal which questions the sustainability of sites and policies. It is accepted that not every proposal or allocation would be sustainable but it is about providing a balance.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP778	1.0.3	Paragraph	Neutral	How do you measure sustainable carrying capacity calculated for the Darlington area Growth is not sustainable: what is the maximum planned size of Darlington above which the town must not grow in order to be able to have enough local resources to supply the population of the Borough	Sustainable capacity not mentioned in text. I refer to sustainability appraisal. We believe the sustainability appraisal is robust and can be defended at Examination.	No change recommended
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP259	Figure 1.2	Stages of Preparation of of the Local Plan	Object	Village Engagement 2017 in Heighington was not consultation in the true sense of the word. Meeting for vision of village mainly constituted of professionals and the developers. Consultation therefore with the people that matter i.e. local Heighington residents and their Parish Council was non-existent.	Although not part of the formal consultation process these events were additional targeted events to enable village communities the opportunity to contribute to the Draft Plan before it's formal consultation.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mr Andrew Ward				DBDLP194	1.0.4	Paragraph	Object	Policy Plan should cover Flood zones from the Strategic Flood Risk Assessment (SFRA).	SFRA is evidence produced for the submission Plan. Flood risk and findings from the SFRA have been taken account of in the Housing and Employment Land Availability Assessment and Sustainability Appraisal for each of the individual allocated sites of the Draft Plan	No change recommended
Mrs Lisa Bramfitt				DBDLP503	1.0.4	Paragraph	Object	The OS Policy map should be overlaid with recent evidence of flooding.	Flood zones will not be overlaid on the policies map as this is a planning constraint. Flood zones have been considered in the allocation of sites via the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Flood zone data will be available in the Strategic Flood Risk Assessment which will be available with the Submission Draft.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP768	1.0.4	Paragraph	Object	Draft Local Plan site maps must be overlaid with evidence flood risk from rivers, reservoirs and surface water flooding, Proper consultation cannot be achieved, until the relevant flood maps are produced and supplied.	Flood zones will not be overlaid on the policies map as this is a planning constraint and not a policy proposal. Flood zones have been considered in the allocation of sites via the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Flood zone data will be available in the Strategic Flood Risk Assessment which will be available with the Submission Draft.	No change recommended
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP377	1.0.6	Paragraph	Support	Explanation of background of Neasham Parish Councils response and that individuals will respond individually.	Comment noted	No change recommended
Mr Christopher Bell	Highways England			DBDLP883		Context	Neutral	Summary of Context of Draft Local Plan and remit of HE to comment on SRN	Comments Noted	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP769	1.2.2	Paragraph	Neutral	It should always be weighed up whether growth is a positive for the town and what the potential impact is on existing residents particularly in relation to loss of green space, traffic congestion etc.	The Community Strategy advocates positive growth for Darlington and it is a key aim of the plan to keep Darlington as an attractive place to live, work and invest. A range of policies are proposed within the plan to afford environmental protection.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Miss Lucy Blakemore				DBDLP10	1.2.4	Paragraph	Neutral	What are the links between Community Strategy objectives to the Local Plan / A place designed to thrive	Identifies areas to grow revive and regenerate	No change recommended
Mrs Gwen Park				DBDLP174	1.2.4	Paragraph	Object	To give children the best start in life It is difficult to see how the council is supporting this objective	This is an aim of the Community Strategy and will be achieved through numerous interventions throughout the councils activities. A lot of sites proposed for development are not publicly accessible anyway and most will provide new accessible greenspaces, walking routes, cycleways etc.	No change recommended
b everington				DBDLP270	1.2.4	Paragraph	Object	Fail to see how this statement can possibly be fulfilled when allowing building on greenfield sites and parkland which is what creates a "healthy and independent" population.	This is an aim of the Community Strategy and will be achieved through numerous interventions throughout the councils activities. A lot of sites proposed for development are not publicly accessible anyway and most will provide new accessible greenspaces, walking routes, cycleways etc.	No change recommended
Mrs Gwen Park				DBDLP239	1.2.4	Paragraph	Object	Re Objective: more people to care for the environment Community Plan priority not followed in Local Plan allocations	This is an aim of the Community Strategy and will be achieved through numerous interventions throughout the councils activities. A lot of sites proposed for development are not publicly accessible anyway and most will provide new accessible greenspaces, walking routes, cycleways etc.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP770	1.2.4	Paragraph	Neutral	Some outcomes from Community Strategy questioned (Health and Environment)	Comments noted but Community Strategy outcomes remain valid as a document.	No change recommended
Dr Andrew Newens				DBDLP160	1.2.5	Paragraph	Support	Re-Use of Brownfield sites in Town Centre Fringe and Town Centre before Greenfield sites at edge of the town.	Comments noted	No change recommended
Mrs Gwen Park				DBDLP175	1.2.5	Paragraph	Support	Brown field areas should be used before considering the use of green belt areas.	Support noted	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mrs Lisa Bramfitt				DBDLP505	1.2.5	Paragraph	Object	The plan should provide a 'brown field only' solution proposal, one which would allow the existing greenbelt to remain intact and instead promote the development of existing sites only.	The plan consists of approaches to both greenfield and brownfield solutions. Some Brownfield sites are deemed currently un viable.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP771	1.2.5	Paragraph	Neutral	Agreement with the redevelopment of brownfield sites - this development must be carried out first to provide high-quality and high density eco-home car-free developments close to town with good walking, cycle and public transport links	Comments noted	No change recommended
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP831	1.2.5	Paragraph	Support	Support of Growth Strategy for Darlington locations in 1.2.5.	Support noted	No change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP1303		Sustainable Economic Growth	Support	Target of sustainable growth with target of 7000 jobs supported	Support noted	No change recommended
	Hellens Land	mr Baker		DBDLP784	1.3.1	Paragraph	Support	Hellens support ambition to economic growth via the Local Plan and its relevant Economic Strategies	Support noted	No change recommended
Miss Lucy Blakemore				DBDLP11	1.3.2	Paragraph	Neutral	Are new houses really needed / Can quality of life be increased by regeneration of existing areas	Please see officer response on housing requirement and standard method.	No change recommended
Mr David Clark				DBDLP53	1.3.2	Paragraph	Object	Housing need questioned	Please see officer response on housing requirement and standard method.	No change recommended in this section
Mrs Lisa Bramfitt				DBDLP506	1.3.2	Paragraph	Object	Demand for houses to high as documented by falling school figures and low birth rates.	Please see officer response on housing requirement and standard method.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mrs Laura Roberts	Northumbrian Water			DBDLP724	1.3.2	Paragraph	Neutral	No opinion growth rates	Comments noted	No change recommended
	Hellens Land	mr Baker		DBDLP785	1.3.2	Paragraph	Support	Support for house building as well as a source for jobs. Support for the Darlington Employment Needs Report Sep 2017.	Support noted	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP775	1.3.2	Paragraph	Object	Housing need disputed. Social, economic and environmental damage.	Please see officer response on housing requirement and standard method. Environmental, economic and social impacts of development have been considered via the Housing and Employment Land Availability Assessment and Sustainability Appraisal.	No change recommended
Paul Hunt	Persimmon Homes			DBDLP1176	1.3.2	Paragraph	Support	Support of 10000 new homes over plan period	Support noted	No change recommended
Andrew Nevens				DBDLP161	1.3.3	Paragraph	Support	Brownfield sites in Town Centre near locations favoured	Support noted	No change recommended
	Hellens Land	mr Baker		DBDLP786	1.3.3	Paragraph	Support	Hellens Land fully supports the Local Plan's recognition of *the "contribution that housebuilding makes to the local economy" and the 7000 jobs*	Support noted	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP777	1.3.3	Paragraph	Object	Evidence that building more homes will support 7000 jobs creates	The evidence that supports the 7,000 is found in the Employment Land review, published as background evidence. It must be remembered that 500 young people remain in NETS so any employment could be considered better than none, whilst we would always want to attract good quality employers.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP780	1.3.4	Paragraph	Neutral	Town Centre facilities and amenities such as library should be included	Heritage assets are protected by national legislation and other policies within the Local Plan. The council has announced it's intention to retain the library function at Crown Street.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mrs/Dr Bryony Holroyd				DBDLP873	1.3.4	Paragraph	Neutral	Assembled ideas to support and enhance Town Centre	The measures identified are all supportable but are not Local Plan matters but more an issue for Council investment opportunities or a Town Centre Strategy. It must be remembered the Local Plan is a land use document and cannot solve all the ills.	No change recommended
Mrs Gwen Park				DBDLP176	1.3.5	Paragraph	Object	Need for improvement of A1155 Harrowgate Hill / Whinfield	Not relevant for this section but concerns noted and the Submission Draft of the local plan will be supported by detailed highway modeling work.	No change recommended
Mrs/Dr Bryony Holroyd				DBDLP874	1.4.1	Paragraph	Object	Covenant of Mayors requirements not taken up	It is not a policy or a plan and should not focus here as a key document for the Local Plan preparation it is taking into account in other sections in terms of outcome and ambitions (Physical Infrastructure IN 9 / ENV 7 / DC 1)	No change recommended
Mr Mike Allum	Durham County Council			DBDLP1062		Duty to Co-operate	Neutral	Both councils can successfully demonstrate to the Planning Inspectorate that the duty to co-operate test has been met.	Comment noted	No change recommended
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP1209		Duty to Co-operate	Object	Consistency of approach for DTVA with Stockton Borough Council. To address this issue, DTVAL would like to work with the Councils to agree a specific Airport-related policy, which is broadly similar to the one included within emerging Stockton-on-Tees Local Plan.	Stockton-on-Tees and Darlington Boroughs both signed a statement of common ground in advance of the examination into the draft Stockton on Tees Local Plan that agreed that; 'both Local Plans should; • Support the ongoing use of the regional airport and related uses; • Recognise the employment allocations at the airport in line with planning permissions and the airports masterplan.' Both plans including the DBC Draft Plan in our view follow this set out aims: • Support the ongoing use of the regional airport and related uses; • Recognise the employment allocations at the airport in line with	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									planning permissions and the airports masterplan. The airport has recently been acquired by the Tees Valley Combined Authority and the future plans are at present uncertain but the Plan does support the employment opportunities at the airport	
Dr Andrew Newens				DBDLP 162	1.5.2	Paragraph	Support	Duty to Cooperate with County Durham rather than TVCA	Support noted and Durham key partner	No change recommended
Mr David Clark				DBDLP 54	1.6.1	Paragraph	Object	Too many greenspaces included in allocations.	Please see officer response on Housing matters relating to 'Brownfield Sites, Urban Sprawl and Empty Homes'.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 202	1.6.1	Paragraph	Neutral	Darlington Friends of the Earth is pleased that the Council's Local Plan recognises that greenspace is good for our well-being, yet many of these green spaces are being developed or are earmarked for development. Darlington Friends of the Earth would like the council to develop brownfield sites before green field sites.	Please see officer response on Housing matters relating to 'Brownfield Sites, Urban Sprawl and Empty Homes'.	No change recommended
Mr Royston Mann				DBDLP 304	1.6.1	Paragraph	Support	Green spaces haver great benefit for health and wellbeing	Support for greenspaces noted	No change recommended
Mrs Lisa Bramfitt				DBDLP 510	1.6.1	Paragraph	Object	Plan Proposals ignore natural Green spaces and aims setout in 1.6.1.	Please see officer response on Housing matters relating to 'Brownfield Sites, Urban Sprawl and Empty Homes'.	No change recommended
Mrs/Dr Bryony				DBDLP 876	1.6.1	Paragraph	Support	Green space and tree impact on health and wellbeing	Support noted	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Holroyd										
Mrs/Dr Bryony Holroyd				DBDLP 877	1.6.2	Paragraph	Support	Slow and sustainable transport should be a preference and also an approach for health and wellbeing.	Support noted and predominantly reflected in the approach to sustainable transport in Section 10.	No change recommended
Canon Chris Beales				DBDLP 343	1.6.3	Paragraph	Support	Support of Healthy New Towns principles in Plan	Support Noted	No change recommended
Dr Andrew Stevens				DBDLP 163		Neighbourhood Planning	Object	Attempts to increase sustainable transport solutions have been limited. Disappointed with the lack of cycling schemes and the bias shown towards the private car. The replacement traffic light junction at St Cuthberts Way is not safe for cyclists (turning left onto Parkgate). The ring road acts as a concrete noose on the town and should be addressed. Surface car parks should be removed with fewer multi story car parks.	Cycling provision is encouraged in all developments as part of the plan including provision of new routes, enhancement of existing and providing improved connections. Safety concerns with existing highway layouts are considered outside of the Local Plan by the Highway Authority. It is acknowledged that the inner ring road does create a substantial barrier. The Town Centre Fringe Masterplan has looked opportunities to lessen the effect. Convenient Town Centre Parking remains a key part of the Town Centre Strategy however a number of surface car parks have been removed to make better use of the land.	No change recommended
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1017		Neighbourhood Planning	Neutral	When developing the Local Plan the Council should fully consider the emerging neighbourhood plans, where they are suitably advanced, including the Low Coniscliffe and Merrybent Neighbourhood Plan.	The status of the Coniscliffe and Merrybent Neighbourhood Plan is noted.	No change recommended.
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1018		Neighbourhood Planning	Object	Low Coniscliffe and Merrybent Parish Council consider the that the Local Plan should give more recognition of the role of neighbourhood plans as part of the development plan.	Neighbourhood Plans will be given appropriate recognition as specified by the National Planning Policy Framework.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mrs/Dr Bryony Holroyd				DBDLP878	1.8.1	Paragraph	Object	The presumption is only in favour of sustainable development: If the development would not be sustainable without the necessary restrictions / obligations then the development must not take place, and it is therefore correct that is should not be viable.	As noted, it must be demonstrated that a development proposal is sustainable, under the terms set out in the National Planning Policy Framework, in order for the presumption to apply. as stated the presumption. However, viability in this section of the Local plan refers to development being financially viable and thereby deliverable from a commercial point of view.	No change recommended.
Canon Chris Beales				DBDLP355	2	VISIONS, AIMS AND OBJECTIVES	Support	Broad vision for Darlington welcomed. It is essential to be equipping young people with skills which will become relevant to "tomorrow". Community building will be important - education and healthcare should be integrated into new communities and not just left as separately provided, often in existing locations which are not integral to a new community.	Support and comments noted.	No change recommended.
Mrs Laura Roberts	Northumbrian Water			DBDLP725	2	VISIONS, AIMS AND OBJECTIVES	Support	We support the overarching aims and objectives of Darlington Borough Council contained within the draft plan, and we will look to work with the council any way in which we can to help support the delivery of the vision for the Borough. We are particularly pleased to note objective 5, which aims to protect and enhance the natural environment. We believe that any planning document spanning a considerable length of time should aim to mitigate and reduce the potential flood risk, particularly as the effects of climate change will be realised within the duration of the plan.	Support noted.	No change recommended.
Mr Christopher	Highways England			DBDLP884	2	VISIONS, AIMS AND OBJECTIVES	Neutral	Highways England's primary interest in this document will be how DBC will meet its housing needs of providing at least 10,000 new homes and the	Comments noted.	No change recommended.

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Bell								economic growth of 7,000 jobs and how this affects the potential for impact on the Strategic Road Network (SRN). Our concern remains the safe and functional operation of the SRN and therefore an assessment of the proposed sites for housing allocation will be undertaken within this note.		
Amy ward	Planning Manager Barratt Homes			DBDLP 1001	2	VISIONS, AIMS AND OBJECTIVES	Support	Support the aims of the local plan to meet housing needs, maintain a five year land supply and have a portfolio of sites. Support the aspiration to identify a range of previously developed land and greenfield sites.	Support noted.	No change recommended.
Jo Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1020	2	VISIONS, AIMS AND OBJECTIVES	Object	The vision of the draft DBLP is supported, as is the specific recognition within paragraph 4.0.9 that: 'the Borough's villages and countryside are an integral part of what makes Darlington an attractive place to live. Their vitality and viability need to be safeguarded and strengthened'. However, LCMPC submit that a number of policies and proposals within the plan will not support the delivery of the vision. LCMPC object to the level of housing development proposed and the two strategic housing proposals at Coniscliffe Park. LCMPC consider these proposals will result in a loss of identity of the villages of Low Coniscliffe and Merrybent and have a significant impact on the natural environment.	Support for the vision noted. Please see officer response on housing requirement and standard method.	No change recommended.
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1210	2	VISIONS, AIMS AND OBJECTIVES	Object	Modify Objective 1c to include DTVA as an example of a key economic driver.	It is not considered necessary to include specific examples of economic drivers in Objective 1c.	No change recommended.

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Paul Hunt	Persimmon Homes			DBDLP1177	2	VISIONS, AIMS AND OBJECTIVES	Support	Persimmon Homes are generally supportive of Local Plan vision, along with he the aims of delivering at least 10,000 new homes and maintaining a 5 year land supply. The council is commended for seeking to achieve housing growth in excess of the OAN generated by the Standard Methodology which Persimmon Homes agrees generates an OAN far too low to support the economic growth ambitions of the council.	Support noted and agreed. Please see officer response on housing requirement and standard method.	No change recommended.
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP1128	2	VISIONS, AIMS AND OBJECTIVES	Support	Generally support the vision and strongly support the aim to meet housing needs for the Borough. Also support the need for "A Well Connected Borough" with development located in sustainable locations with good access to services and facilities, helping to "Create Cohesive, Proud & Healthy Communities".	Support noted.	No change recommended.
Mr G Raistrick		Mr Joe Ridgeon		DBDLP1238	2	VISIONS, AIMS AND OBJECTIVES	Support	The Local Plan Vision is generally supported. Strongly support the aims and objectives relating to meeting housing needs, having a portfolio of sites, creating a well connected borough and creating cohesive, proud and healthy communities.	Support noted.	No change recommended.
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP1229	2	VISIONS, AIMS AND OBJECTIVES	Support	Taylor Wimpey is supportive of Aims and Objectives	Support noted.	No change recommended
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP1254	2	VISIONS, AIMS AND OBJECTIVES	Support	The Local Plan Vision is generally supported. Strongly support the aims and objectives relating to meeting housing needs, having a portfolio of sites and creating cohesive, proud and healthy communities.	Support noted.	No change recommended.
	Church Commissioner	Ms Lucie	Barton Willmore	DBDLP1153	2	VISIONS, AIMS AND OBJECTIVES	Support	General support for the proposed vision, however, further emphasis should be placed on the commitment to	General support for the vision and aims noted.	No change recommended.

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	s for England (CCE)	Jowett						provide a variety of house types and sizes through the delivery of much needed new homes in sustainable locations. This is particularly important given the past undersupply of housing that has been recorded in the Borough. In light of this we advocate the following points added to the vision which state: • The Local Plan will seek to boost significantly the supply of housing within the Borough; ensuring that housing need can be sufficiently met over the plan period and that an appropriate balance between jobs and new homes is achieved. • That growth is focussed on sustainable locations within the Borough including logical extensions to the existing urban area. Most recent data shows that the Council has issues of previous low levels of housing supply. Therefore, to realise this objective throughout the new plan period, the Council must tackle these issues. Without a consistent and robust approach, the objectives can be regarded as unsound for being ineffective and inconsistent with national policy as the Local Plan will be in direct conflict with the clear aspirations of national policy and will undermine the delivery of the overarching vision. The aims do not specifically refer to the delivery of housing and as a result, these are considered to be unsound for being ineffective and not consistent with national policy.	It is considered that Aim 2 and its associated objectives sufficiently cover the points raised. Please see officer response on housing requirement and standard method. The first overarching aim refers to the delivery of sustainable development to meet the Borough's needs, this statement incorporates housing needs along with other land use requirements over the plan period.	

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	Godolphin Developments Ltd	Ms Jennifer Nye	Lichfields	DBDLP 1260	2	VISIONS, AIMS AND OBJECTIVES	Neutral	Support the vision for the Local Plan. The objective to diversify the rural economy to support businesses and existing communities, while also protecting the Borough's valued open countryside is supported. An objective which specifically refers to housing in rural areas to meet identified local needs should be included.	Support noted. Aim 2: Meeting Housing Needs, and its associated objectives, also encompasses the needs of rural areas.	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1304	2	VISIONS, AIMS AND OBJECTIVES	Support	The Local Plan vision and aims are appropriately ambitious and are supported. The first aim refers to the realisation of 6,000 new jobs over the plan period. In accordance with the introduction, and later policies in the plan, this figure should be clarified as 7,000 net additional jobs over the plan period.	Support noted. The first Local Plan aim refers to the target of 7,000 new jobs.	No change recommended.
Simon Bainbridge				DBDLP 397	2.0.1	Paragraph	Support	I support the production of a Local Plan as it is important for the town to have formal planning to prevent speculative, unplanned detrimental development.	Support noted.	No change recommended.
Miss Madeleine Sutcliffe				DBDLP 394	2.0.1	Paragraph	Support	The council isn't moving in the right direction to preserve the best aspects of Darlington and to enhance its infrastructure to make the town a pleasant place in which to live, work and play. The town centre is in desperate need of revival. Convert upper storeys of larger and historic ex-stores buildings into apartments, and divide up larger buildings into smaller, unique retail units of the kind people want to browse and buy from.	Town centres around the country are facing a number of challenges such as the growth of online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. An infrastructure plan has been prepared to support the Local Plan that identifies	No change recommended.

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									infrastructure required to support new development. Policy IN 10 provides protection to existing community facilities in the borough.	
Canon Chris Beales				DBDLP 344	2.0.1	Paragraph	Support	Support the Local Plan Vision. Aims 4 and 6 need linking more. Objective 4g talks about healthier houses but 6 does not mention designing them in ways which are eco-friendly. New schools built in new communities can serve as more than just places to educate children. They can serve as community hubs and create healthier communities. Developments should not just be left to housebuilders who produce, in many cases across the country, similar (cramped and often unattractive) new estates with no community facilities and not enough green space.	Support and comments noted. Aim 6 encourages energy and water efficient design in new development, this includes housing.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 578	2.0.1	Paragraph	Support	CPRE supports the vision but questions if the council can deliver the vision and its objectives. The underlying vision for the Plan is that Darlington should be "perfectly placed" given its transport connections, character as a market town, railway and Quaker heritage.	Support and comments noted.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 579	2.0.1	Paragraph	Object	Concerned that the scale of housing growth proposed as urban extensions to Darlington will destroy its attractive and distinctive market town character.	Objection noted. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal. Policies contained in the emerging Local Plan will	No change recommended.

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									minimise the impact of new development on the market town character of Darlington.	
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 350	2.0.1	Paragraph	Support	We recognise there needs to be ordered development within the town.	Support noted.	No change recommended.
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 661	2.0.1	Paragraph	Neutral	Some reference to health outcomes and narrowing the gap would be a useful adjunct to the Local Plan Vision.	Comment noted. Aim 4 of the Local Plan relates to creating cohesive, proud and healthy communities with a number of associated objectives aimed at improving health and reducing inequalities.	No change recommended.
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 832	2.0.1	Paragraph	Support	Support the vision for the Local Plan and role Skerningham plays in its delivery.	Support noted.	No change recommended.
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP 850	2.0.1	Paragraph	Support	Welcome and support the vision for the Local Plan including that development be supported by new and improved infrastructure and community facilities.	Support noted.	No change recommended.
Irene Ord	Listed Property Owner			DBDLP 863	2.0.1	Paragraph	Neutral	Planning conditions must be robustly used and carefully monitored to protect and sustain conservation areas, designated assets and their supportive settings. Can the public have confidence that the local authority has the capacity, expertise and resources to scrutinise and monitor all of the projects they are proposing to move forward? Where is the evidence that Historic England's Best Practice Advice &	Comments and concerns noted. The emerging Local Plan contains a range of local planning policies that will guide the type, location and design of new developments across the borough, including controlling the impact of development on heritage assets and their setting. Planning conditions will be used, where necessary, enhance the quality of developments and mitigate potential adverse impacts. The Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								Guidance will be robustly used to assess the potential impact of developments on heritage assets? The proposed for a local asset record (Appendix C) is commendable but will the system be adequately supported?	significance of heritage assets, including their settings, as part of a heritage impact assessment.	
Ms Emily Hrycan	Historic England			DBDLP 1101	2.0.1	Paragraph	Support	We welcome the inclusion of the historic environment in the vision for Darlington Borough.	Support noted.	No Change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1325	2.0.1	Paragraph	Neutral	General support for the proposed vision, however, further emphasis should be placed on the commitment to provide a variety of house types and sizes through the delivery of much needed new homes in sustainable locations. This is particularly important given the past undersupply of housing that has been recorded in the Borough. In light of this we advocate the following points added to the vision which state: • The Local Plan will seek to boost significantly the supply of housing within the Borough; ensuring that housing need can be sufficiently met over the plan period and that an appropriate balance between jobs and new homes is achieved. • That growth is focussed on sustainable locations within the Borough including logical extensions to the existing urban area.	Support for the vision noted. It is considered that Aim 2 and its associated objectives sufficiently cover the points raised. Please see officer response on housing requirement and standard method.	No change recommended.
Miss Lucy Blakemore				DBDLP 12	2.0.2	Paragraph	Support	Support the Local Plan aims. However, how will you balance the retention of Darlington as a historic market town and the creation of modern centre?	Comment noted. It is the aim of the Local Plan and planning system to find an appropriate balance. The Local Plan includes a range of local policies aimed at both preserving the historic and natural environment within the borough and delivering new development to	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									provide for the needs of residents and grow the local economy. Each decision on development proposals and projects will need to carefully balance these different aspirations, guided by these local policies and national legislation.	
Mr David Clark				DBDLP55	2.0.2	Paragraph	Object	Totally disagree and object to the Local Plans housing figure when the government own figure for the town is around 177 new homes per annum. Object to the use of greenfield land. Enough Brownfield sites exist within the towns boundaries. Greenfield areas contribute to residents mental and physical health, and local wildlife. Redevelopment results in more people coming to the area, which helps local businesses. Building on greenfield sites harms the town centre.	Objections to Aim 2 noted. Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal. Growth around the town will generate increased expenditure in the town centre that will help to support local employment and the vitality and viability of the centre.	No change recommended.
Mr David Clark				DBDLP58	2.0.2	Paragraph	Neutral	Support objective 4f to improve access to green spaces for leisure and recreation which contribute to residents mental and physical health but question if the suggested long term development on green spaces as part of urban extensions will be counter productive to this aim.	Support for objective 4f and associated concerns noted. Whilst development of sites on the urban edge will inevitably change the nature of the landscape of the area, it will maintain opportunities for recreation by new and existing residents, with access via public rights of way retained, and with additional green infrastructure provided as part of the development as required by Policies ENV 4 and ENV 5. Policy ENV 5 of the Local Plan prioritises the provision of wildlife friendly green space as part of on-site provision.	No change recommended
Simon Bainbridge				DBDLP399	2.0.2	Paragraph	Object	Objective 1 - the figure of 7000 new jobs is aspirational and not based on evidence. There is also a significant contraction of the town centre including the closure of two major retailers (and employers) making this figure even less likely.	The jobs growth factored into the plan is realistic as it is based on past trends of employment growth in the borough. Further detail can be found in the officer response on the housing requirement and standard method, and the Darlington Future Employment Needs	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									Report (September 2017) produced as part of the Local Plan evidence base. Town centres around the country are facing a number of challenges such as the growth of online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. Growth proposed in the Local Plan around the town will generate increased expenditure in the town centre that will help to support local employment and the vitality and viability of the centre.	
b Darlington				DBDLP 272	2.0.2	Paragraph	Neutral	Doubt that 7000 new jobs can be achieved during the plan period, and how job losses will be accounted for.	The jobs growth factored into the plan is realistic as it is based on past trends of employment growth in the borough. Further detail can be found in the officer response on the housing requirement and standard method, and the Darlington Future Employment Needs Report (September 2017) produced as part of the Local Plan evidence base.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 204	2.0.2	Paragraph	Support	Welcome the conservation and enhancement of the natural and historical environment and landscapes as a key outcome or overarching aim.	Support noted.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 205	2.0.2	Paragraph	Support	The objectives/environmental outputs are welcome, together with resilience to climate change.	Support noted.	No change recommended.
Mrs Gwen Park				DBDLP 240	2.0.2	Paragraph	Neutral	If DBC is to support aim 5 to protect the environment and countryside, why are DBC supporting the building on so much greenbelt areas.	Comments noted. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								DBC proposal to build 10000 houses is well above the government recommendation.	and agricultural value as considered in the Council's Sustainability Appraisal. Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	
Kieron Warren				DBDLP 281	2.0.2	Paragraph	Object	Aim 3 - This aim should cover the development of public transport and cycling links in existing built-up areas of the borough and not just new developments. Some areas of the town lack adequate cycling infrastructure and, as such, the network is fragmented.	New development can facilitate improvements to public transport and cycling infrastructure in existing built-up areas where improvements meet the conditions for planning obligations, namely that they are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.	No change recommended.
Mr Royston Malin				DBDLP 306	2.0.2	Paragraph	Object	Aim 2 - Totally disagree with the need for 10000 new homes when the governments own figures state that around 177 per annum are needed. If Local Plan Aim 5 is promising to protect and enhance countryside and the natural environment why are DBC supporting building on greenbelt area.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 353	2.0.2	Paragraph	Support	Reasonable aims and objectives.	Support noted.	No change recommended.
Canon Chris Beales				DBDLP 360	2.0.2	Paragraph	Support	There is no mention of the need for spiritual and emotional needs of people moving into and living in the new communities being created.	Support and comment noted. It is considered that Aim 4, and its associated objectives, sufficiently covers the factors that the Local Plan can influence to create the environment for communities to develop.	No change recommended
Mrs Lisa Bramfitt				DBDLP 511	2.0.2	Paragraph	Object	The Aims and Objectives of the plan are aspirational and do not reflect the real world.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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								Why should there now be a clamour to bring business to Darlington when, over the past 10 years we have seen a systemic decline in businesses, shops, facilities and council provisions. The town centre is being left behind by the current council approach. The plan should seek to address the existing fundamental issues of how to make Darlington an attractive place to come to first.	The jobs growth factored into the plan is realistic as it is based on past trends of employment growth in the borough. Town centres around the country are facing a number of challenges such as the growth of online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. Growth proposed in the Local Plan around the town will generate increased expenditure in the town centre that will help to support local employment and the vitality and viability of the centre. The Local Plan contains a range of local policies and proposals aimed at making the borough an attractive place to live, work and invest.	
Mr Colin Raine				DBDLP 632	2.0.2	Paragraph	Neutral	Agree that Darlington Borough should have an identity as an historic market town situated amongst countryside & villages but fail to see how this can be achieved by building thousands of houses in the surrounding countryside and over developing the villages. How is Darlington's natural & historic environment being cherished & protected by the local plan?	Local Plan aims 4 and 5 cotain objectives to mitigate these concerns, and are reflected in the draft policies on the plan, notably those in the Environment chapter of the plan (section 9).	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 585	2.0.2	Paragraph	Support	CPRE supports Objectives 3a and 3e.	Support noted.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) -			DBDLP 580	2.0.2	Paragraph	Support	Overarching aims supported.	Support noted.	No change recommended.

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	Darlington Group									
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 581	2.0.2	Paragraph	Object	Aim 1 - question whether 7000 jobs is achievable or sustainable.	The jobs growth factored into the plan is realistic as it is based on past trends of employment growth in the borough. Further detail can be found in the officer response on the housing requirement and standard method, and the Darlington Future Employment Needs Report (September 2017) produced as part of the Local Plan evidence base.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 582	2.0.2	Paragraph	Object	The number of houses Darlington Borough Council aspires to are totally excessive and unnecessary. Support for Aim 2, Objectives a, b, c and d.	Please see officer response on housing requirement and standard method. Support for objectives noted.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 583	2.0.2	Paragraph	Object	CPRE is concerned at Objectives 3b, 3c, and 3d as the transport links are not listed so it is not possible to be certain whether any are proposals for roads in the Borough to which CPRE strongly objects, such as the Darlington Northern Link Road.	Proposals for new road infrastructure are summarised in Section 10 of the Local Plan, and specifically Policies IN 1 - 4.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 588	2.0.2	Paragraph	Support	CPRE Supports these Aims 4 - 6 and their associated objectives.	Support noted.	No change recommended.
Joanne Harding	Home Builders Federation			DBDLP 782	2.0.2	Paragraph	Support	Generally supportive of Local Plan Aim 2, and the objectives to achieve and maintain a five-year supply of housing land, and to have a portfolio of sites.	Support noted.	No change recommended.
	Hellens Land	mr Baker		DBDLP 787	2.0.2	Paragraph	Support	Support Aim 1 of the Local Plan. The allocation at Greater Faverdale is a key part of the Local Plan's economic and employment objectives in particular, objective 1c. Support the Council's recognition of the strategic importance of housing	Support and comments noted.	No change recommended.

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								supply to the local economy. The proposals at Greater Faverdale will facilitate the delivery of a high quality mixed use community.		
	Hellens Land	mr Baker		DBDLP 788	2.0.2	Paragraph	Support	Hellens Land supports the approach taken to identifying and meeting the objectively assessed housing need in Darlington Borough Council. We support the Council's approach of identifying a figure based on the economic needs of the authority not the demographic projection which would lead to a fall in working age persons.	Support noted.	No change recommended.
Matthew Snedker				DBDLP 749	2.0.2	Paragraph	Object	Aim 2: The aim of 10000 new homes is excessive. Aim 3 a and Aim 4 h, i and j: The Borough could adopt higher standard Interim Advice Note 195/16 Cycle Traffic and the Strategic Road Network. The basic principles for all residential areas in the Borough should follow these broad points; 1) Default 20mph limits 2) Filter through traffic to stop 'rat-running' 3) Continuous footways and cycleways across side roads 4) Direct, segregated and continuous walking and cycling routes along distributor roads. Aim 3 d - If this means that the plans to manage demands down wards then I support this point. However, if this means building more roads and widening existing roads and junctions to handle peak motor traffic demands then I oppose this point. The capital and revenue demands from the flawed 'predict and provide' policy is	Please see officer response on housing requirement and standard method. New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds. Speed limits are a highways matter and can be altered where there are justified concerns over safety. Additional roads are proposed as part of the mitigation but the future design process will involve factoring sufficient and safe permeability for pedestrians and cyclists. Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planning document.	No change recommended.

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								unsustainable and damaging to the towns social and green infrastructure. Aim 4 g - The ability to cut domestic energy demand (heating, cooling and power) by c. 80% is offered by following the Passiv Haus standard. The marginal increase in costs are far outweighed by the reduction in energy demand for the lifetime of the dwelling. Aim 5 - The unsustainable and unnecessary expansion of the town by building 10,000 new homes will prevent this goal being achieved. Aim 6 b - There is no land set aside in the plan expressly for the generation of renewable energy.	In relation to Aim 5 this needs to be considered on a borough wide scale. It is acknowledged there will be some localised impacts but thorough mitigation will be key along with enhancing quality and accessibility to greenspace over quantity. Changes are proposed to Policy IN9 Renewable and Energy Efficient Infrastructure. Although this does not specificly identify sites for renewable energy developments as this can prove restrictive. Instead a criteria based approach is proposed in the Proposed Submission Draft Plan.	
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 833	2.0.2	Paragraph	Support	The aims insofar as they relate to Skerningham Estates Ltd's land interest at Skerningham are generally supported. Aims 2 and 3 supported.	Support noted.	No change recommended.
Mr Tom Clarke	National Planning Adviser Theatres Trust			DBDLP 814	2.0.2	Paragraph	Support	The Theatre Trust supports Aim 4, and the Council's aspiration to maintain Darlington's identity as a historic market town and to maintain a vibrant, attractive and safe town centre offering retail, cultural, leisure, tourism and employment opportunities. We recommend that the plan's town centre policies are flexible in supporting permanent change of use to non-retail uses where A1 can be demonstrated to be non-viable, and actively supports temporary uses which help activate vacant units.	Support noted. Town centres around the country are facing a number of challenges such as the growth of online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. Policy TC 2 provides some flexibility within the towns Primary Shopping Area for change of uses away from A1 (shops) in order to maintain	No change recommended.

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								More fundamentally, the plan must ensure that it provides robust protection against the loss of valued community and cultural facilities such as theatres, cinemas, music venues, pubs and community halls.	the continuing vitality and viability of the centre. The policy also acknowledges the role that housing can play in revitalising a centre and the use of vacant spaces on the upper floors of buildings. Policy IN 10 provides protection to existing community facilities in the borough.	
Ms Emily Hrycan	Historic England			DBDLP 1102	2.0.2	Paragraph	Support	We welcome the overarching aim which will protect and enhance the quality of Darlington's historic environment.	Support noted.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1326	2.0.2	Paragraph	Object	The overarching aims do not specifically refer to the delivery of housing and as a result, these are considered to be unsound for being ineffective and not consistent with national policy. Generally supportive of the Local Plan objectives, in particular the aim to develop at least 10000 new homes. The Council has issues of previous low levels of housing supply which need to be tackled with a consistent robust approach.	The first overarching aim refers to the delivery of sustainable development to meet the Borough's needs, this statement incorporates housing needs along with other land use requirements over the plan period. Please see officer response on housing requirement and standard method. The Local Plan sets out a consistent and robust approach to tackle previous low housing supply and a robust 5 year pipeline.	No change recommended.
Mr Colin Raine				DBDLP 633		Sustainability Appraisal and Habitats Regulations Assessment	Neutral	To adequately mitigate flood risk developers should be asked to provide permeable driveways and asked to follow government guidance on Sustainable Drainage.	Integration of SUDS into developments is covered in detail in Policy DC4 of the plan. Whilst this does not specifically mention permeable driveways this could be one option to manage surface water. These are discussed in more detail in paragraph 5.4.7 of the draft plan.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 356	2.1.1	Paragraph	Support	Habitats Regulation Assessment needs to be subject to consultation and to be available before any examination in public.	The Habitats Regulation Screening Assessment will be published alongside the Proposed Submission Local Plan, in advance of the examination in public.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England			DBDLP 589	2.1.1	Paragraph	Object	Habitats Regulation Assessment needs to be subject to consultation and to be	The Habitats Regulation Screening Assessment will be published alongside the Proposed	No change recommended.

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	(CPRE) - Darlington Group							available before any examination in public.	Submission Local Plan, in advance of the examination in public.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP197	2.1.2	Paragraph	Support	Habitats Regulation Assessment needs to be subject to consultation and to be available before any examination in public. Darlington Friends of the Earth do not believe there are any sites within Darlington itself that will require a Habitats Assessment but developments in Darlington may impact on such sites elsewhere (particularly Teesmouth and Cumbria). The council should make it clear that it will be looking at such impacts.	The Habitats Regulation Screening Assessment will be published alongside the Proposed Submission Local Plan, in advance of the examination in public.	No change recommended.
Mr Jake Nixon				DBDLP332	3	SUSTAINABLE DEVELOPMENT	Object	The plan should be more ambitious and promote stronger garden town principles and significantly increased standards for things such as cavity wall insulation, lighting, glazing, green roofs etc. Also doing more to encourage a greater diversity in garden planting is suggested to make areas more attractive to flora and fauna. Treatment of highway verges is also discussed.	Construction methods and standards are considered by Building Regulations. The plan would be supportive of developments that provide additional energy saving features. The other matters including treatment of private gardens and highway verges are something the Local Plan has no control over.	No change recommended
Mr Christopher Bell	Highways England			DBDLP886	3	SUSTAINABLE DEVELOPMENT	Support	Support of policy in line with national policy and agreement to monitor policy implementation.	Support noted	No change recommended
Charles Johnson	Conservative Group			DBDLP113	Policy SD 1	Presumption in Favour of Sustainable Development	Support	Welcome inclusion of neighbourhood plans.	Once a neighbourhood plan or order is formally adopted by the Council, it becomes part of the statutory planning framework for the area.	No change recommended
Mrs Laura Roberts	Northumbrian Water			DBDLP728	Policy SD 1	Presumption in Favour of Sustainable Development	Support	Full support for policy.	Support noted	No change recommended

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Mr John Fleming	Gladman Developments			DBDLP1077	Policy SD 1	Presumption in Favour of Sustainable Development	Support	In principle Gladman fully supportive of the direction taken in policy SD1 Gladman consider that SD1 could go further in its approach to ensuring the delivery of sustainable development.	Comments noted. Delivery will be monitored throughout the plan period and appropriate action taken if necessary which may include plan review.	No change recommended
Paul Hunt	Persimmon Homes			DBDLP1178	Policy SD 1	Presumption in Favour of Sustainable Development	Support	Support for Policy SD1.	Support noted	No change recommended
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP1109	Policy SD 1	Presumption in Favour of Sustainable Development	Neutral	Policy should be deleted as already covered elsewhere.	This follows a model policy suggested by the Planning Advisory Service that should be included in all Local Plans.	No change recommended
Ms Lucie Jowett	Church Commissioners for England (CCE)		Barton Willmore	DBDLP1154	Policy SD 1	Presumption in Favour of Sustainable Development	Support	General support for Policy SD1.	Support noted	No change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP1305	Policy SD 1	Presumption in Favour of Sustainable Development	Support	Support for principles but necessity of policy only question.	This follows a model policy suggested by the Planning Advisory Service that should be included in all Local Plans.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1327	Policy SD 1	Presumption in Favour of Sustainable Development	Support	Support of Policy SD1	Support noted	No change recommended
Mr Christopher Bell	Highways England			DBDLP887	4	THE SETTLEMENT HIERARCHY	Support	General support. It is noted that there is a good geographical spread of sites allocated for proposed development.	Support noted	No change recommended
Mr Alastair	Clerk			DBDLP1224	4	THE SETTLEMEN	Support	Support of policy applying to Sadberge	Support noted	No change recommended

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Mackenzie	Sadberge Parish Council					T HIERARCHY				
Miss Lucy Blakemore				DBDLP 13	4.0.1	Paragraph	Support	Spatial choices are important to reduce the potential negative impacts- loss of character, loss of environment quality and reduced economic prosperity as well as conflict with existing residents.	This process of considering appropriate options has been undertaken throughout the development of the plan. Addittional information on site selection is available in the 'Officer Response Paper to Housing Matters' and the Sustainability Appraisal.	No change recommended
Mrs Lisa Blamfitt				DBDLP 512	4.0.1	Paragraph	Object	Spatial choices are the most important consideration for the plan. Concern that the plan will damage the core essence of the area for short term financial gains.	The locational strategy of the plan is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. This is reflected in the settlement hierarchy. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). Development in some of the areas proposed does inevitably result in the loss of largely agricultural land adjacent to the main urban area and service villages, however sites have been selected wherever possible that will minimise the impact on surrounding rural areas. The Council has sought to avoid areas of highest landscape, environmental and agricultural value. Financial gains for organisations or individuals is not a consideration when determining an appropriate locational strategy or through the site selection process.	No change recommended
Mr Peter Hughes				DBDLP 47	Policy SH 1	Settlement Hierarchy	Support	Support of Hurworth being classified as a service village, provided it remains as a separate entity from the south of Darlington.	Support noted. Development limits proposed prevent the coalescence of Hurwoth with the main urban area of Darlington.	No change recommended
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP 376	Policy SH 1	Settlement Hierarchy	Support	Clarity over the status of the various "settlements" is fundamental to understanding the Plan, and the relevance of both policy and detailed discussion to the various parts of the Borough.	Support noted	No change recommended
Mrs	Northumbrian Water			DBDLP 732	Policy SH 1	Settlement Hierarchy	Support	As a statutory undertaker in the provision of water and waste water	Support noted	No change recommended

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Laura Roberts								services we are a formal consultee on all emerging planning policy. Our New Development department provides a planning service which seeks to protect our assets and supports new development through ensuring our network and facilities have capacity to accommodate sustainable growth. Separately, our Estates department is responsible for land and estate issues associated with our operational , non operational and surplus land (safeguarding and releasing land). Consequently two separate responses have been submitted to the consultation and should be read individually. We support the principle of the local plan following the hierarchy of settlements set out in Policy SH1. Generally, as a stakeholder in the region there are no major issues anticipated with facilitating development in any of the named rural villages.		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP834	Policy SH 1	Settlement Hierarchy	Object	Support of paragraph 4.0.8 which identifies the urban fringe as a suitable etc area for development. Policy SH1(a) should however be amended to reflect this and refer to Darlington Urban Area ***and adjoining land.*** This change would be in line with the accompanying key diagram at Figure 4.1.	Strategic Housing locations will be part of the Darlington Urban Area and will be within development limits. As such it is not considered necessary to make the change proposed.	No change recommended
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP852	Policy SH 1	Settlement Hierarchy	Object	The settlement hierarchy does not allow for development in “rural villages” or the countryside except within defined development limits. The NPPF advises that housing should be located where it will enhance or maintain the vitality of rural	Allocating sites for housing in the rural villages does not accord with the locational strategy of the Draft Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will be able to provide) the level of services, facilities and employment opportunities that are required to support communities and an increase in population. It is considered that these areas are	No change recommended

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								communities and NPPG recognises that rural housing is essential to ensure viable use of local facilities. This is reflected in para 4.0.9 of the Draft Local Plan. Policy SH1 should have a more positive approach to development in rural areas and any settlement hierarchy included within the plan should not restrict development to within development limits. Instead, it should simply identify specific locations where development is supported.	the most sustainable locations for new development. Some housing development will be permitted in rural areas, such as rural exception sites, infill development and housing required to support the rural economy, providing they accord with all relevant national and Local Plan policies. Such development will assist in maintaining and enhancing the vitality of rural communities.	
Miss Jennifer Parkshaw	Project Secretary Banks Property			DBDLP 871	Policy SH 1	Settlement Hierarchy	Object	Banks Property consider that due to being an established residential area, the number of facilities and amenities in the local area and its close proximity to Newton Aycliffe, School Aycliffe should be classified as a service village with defined development limits also added to the proposals map. School Aycliffe should also be added to the list of service villages in policy SH 1.	Part of School Aycliffe is within Darlington Borough boundary. Although it is an established residential area there are very limited services and facilities within School Aycliffe when considered as a whole. Newton Aycliffe is in close proximity within County Durham however there would still be a reliance on private vehicles to travel to this larger settlement. In view of this it is considered that there are more sustainable locations for development within Darlington and as such School Aycliffe has not been defined as a service village and does not have defined development limits.	No change recommended
Mr John Fleming	Gladman Developments			DBDLP 1081	Policy SH 1	Settlement Hierarchy	Object	Support of the development strategy contained in Policy SH1 seeks to meet development needs of the borough by promoting an urban focused approach to development supplement with additional large strategic development sites in greenfield locations. Support for directing growth to the most sustainable villages. Notwithstanding the above, Gladman are concerned with the reference made to development limits within this policy as this is sufficiently covered by emerging Policy H 3.	Support noted. The reference to development limits simply provides further clarification with regards to defined settlements and how areas outside of the limits are to be considered.	No change recommended

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Paul Hunt	Persimmon Homes			DBDLP1179	Policy SH 1	Settlement Hierarchy	Support	The settlement hierarchy is focused upon the urban area and surrounded by villages of varying sizes and sustainability. Policy SH1 is reflective of this and establishes a logical framework for development distribution focusing the majority of development to the urban core whilst allowing rural settlements to grow naturally corresponding to their overall sustainability. Support given to the policy and Urban Fringe as the most sustainable and suitable location for growth.	Support noted	No change recommended
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP1129	Policy SH 1	Settlement Hierarchy	Support	Support of Policy SH1.	Support noted	No change recommended
Mr G Raistrick		Mr Joe Ridgeon		DBDLP1248	Policy SH 1	Settlement Hierarchy	Object	Object to distribution of housing development between the three Service Villages, Heighington, Hurworth and Middleton St George, identified in Policy SH1. A more equitable distribution of housing numbers between the villages would ensure a more sustainable form of development and ensure that the Plan is consistent with national policy. The current proposed distribution places too much emphasis on Middleton St George.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). Across the service villages more housing development is proposed at Middleton St George simply because the evidence base identified more sites which were available for development and had less physical constraints.	No change recommended
Mr G Raistrick		Mr Joe Ridgeon		DBDLP1240	Policy SH 1	Settlement Hierarchy	Object	Policy SH1 and the identification of Heighington as a 'Service Village' strongly supported. Support for Statement 1 – Service Villages, which recognises that	Support noted With regards to the alternative site proposed please see officer response to comment DBDLP1245 to policy H 2 Housing Allocations.	No change recommended

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								development is needed to meet local needs. As the service villages have been identified as the next most favourable location for housing development after the main urban area, the land at Heighcroft House, Heighington is considered a prime site to accommodate future residential development to meet the identified need of the village and wider local area.		
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1212	Policy SH 1	Settlement Hierarchy	Object	Modify policy text to make clear the Airport is not classified as countryside. Modify the Policy Map to identify the Airport as a Strategic Growth Location (see Appendix 1) (see file attached 1189) as a Development Limit.	Please see officer response to comment DBDLP1202.	No change recommended
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP 1255	Policy SH 1	Settlement Hierarchy	Support	Policy SH1 is strongly supported, especially the identification of the Darlington Urban Area as the priority area for development.	Support noted.	No change recommended
	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP 1155	Policy SH 1	Settlement Hierarchy	Support	Support for policy SH 1. Our Client (CCE) acknowledges the need for a policy that sets out the spatial approach to delivering sustainable development and meeting the objectives of the local plan. Policy SH 1 enables this by setting out a settlement hierarchy for delivering growth. The settlement hierarchy identifies that the majority of new housing and employment growth is proposed within the main urban area. As the largest and most sustainable settlements within the District, the main urban areas should be the focus for a largest percentage of	Support noted for both the policy and proposed allocation, site ref 100 Hall Farm, Branksome.	No change recommended

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								growth. The overall approach is supported. Our Clients land (site ref 100 Hall Farm, Branksome) provides a site which can be delivered in the next 5 years and therefore should be continued to be allocated and given priority for development early in the plan period.		
Mr Mark Walton		Mr Ian Lyle		DBDLP 1223	Policy SH 1	Settlement Hierarchy	Object	Our client supports the proposed Settlement Hierarchy detailed in Draft Policy SH 1 and the classification of Hurworth as a Service Village. The village has the capacity, and indeed needs, to be the focus for further housing development, over and above existing commitments, to support the long term vitality and viability of the services in the village. Land West Of Roundhill Road should be included in the amended development limits for Hurworth.	Support for policy SH 1 noted. With regards to the alternative site promoted please see response to policy H 2 comment ref DBDLP1219.	No change recommended
	Godolphin Developments Ltd	Ms Jennifer Nye	Lichfields	DBDLP 1263	Policy SH 1	Settlement Hierarchy	Object	The settlement hierarchy does not allow for development in "Rural Villages" or the countryside except within defined development limits. The NPPF advises that housing should be located where it will enhance or maintain the vitality of rural communities and NPPG recognises that rural housing is essential to ensure viable use of local facilities. This is also reflected in para 4.0.9 of the Draft Local Plan.	Allocating sites for housing in the rural villages does not accord with the locational strategy of the Draft Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will be able to provide) the level of services, facilities and employment opportunities that are required to support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development. Some housing development will be permitted in rural areas, such as rural exception sites, infill development and housing required to support the rural economy, providing they accord with all relevant national and Local Plan policies. Also, other economic development will be able to come forward in rural areas providing it meets the criteria within policy E 4: Economic Development in the Countryside.	No change recommended

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Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1306	Policy SH 1	Settlement Hierarchy	Object	The Settlement Hierarchy and position of Hurworth as a service village is supported. The draft policy discusses the 'objectives' for each level of settlement. It states: "…development should not compromise the ability to meet the objectives for other tiers in the hierarchy" It is not explicitly clear what is meant by the 'objectives' for each tier of the hierarchy, although if this relates to Statement 1 (Service Villages) and Statement 2 (Rural Villages), or the Spatial Distribution contained at Table 6.2, then there must be an allowance for the sustainable Service Villages to accommodate a greater level of growth over the plan period in the event that other aspects and allocations in the Local Plan fail to deliver at the rate anticipated. This should be clarified to ensure there is sufficient flexibility in the plan to adapt to rapid change, as set out at paragraph 11 of the Framework. It is further recommended, to ensure there is clarity in situations where there is a lack of 5 year housing land supply, and the plan is able to respond to such situations, that the following wording is inserted in the policy: "At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable sites that would both make a positive contribution to the five year supply of housing land and be well related to the development limits of the main urban	The fall back position referred to is set out within policy H 1: Housing Requirement. The plan should be read as a whole and duplication of policies does not add any benefit.	No change recommended

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								area or service villages (as defined in this Policy) will be supported"		
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1328	Policy SH 1	Settlement Hierarchy	Object	SH 1 supported. The settlement hierarchy identifies that the majority of new housing and employment growth is proposed within the main urban area of Darlington. As the largest and most sustainable settlement, the main urban areas should be the focus for a largest percentage of growth. Whilst this overall approach is supported by our Client, it is considered that sustainable growth should also be supported throughout the Borough on suitable sites. This is particularly important given the persistent under delivery experienced within the borough. Alternative site proposed for allocation at Burtree Lane.	Support noted. The Council will be supportive of sites which are located within the development limits, are sustainable, suitable for housing and are consistent with relevant national and local policies. With regards to the alternative site proposed for allocation please see the officer response to comment DBDLP1335 linked to policy H 2 Housing Allocations.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 219	4.0.2	Paragraph	Object	Objections and concerns raised with regards to four strategic sites. Skerningham • Not sustainable. • Increase in traffic congestion and degradation of air quality. • Should not build on the flood plain. • Green policy and outputs are not clear. • Green Infrastructure buffer zone should be at least 100m from the river Skerne. • Not clear if traffic modelling justifies the housing allocation or the provision of new roads.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Impacts of air pollution have been considered via the sustainability appraisal process. There are a number of planning policies in the Draft Local Plan which aim to prevent new development from contributing to unacceptable levels of air pollution. For example DC 1	No change recommended

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								• New roads should have a 100m green infrastructure buffer on either side. Coniscliffe Park • Not sustainable • Increase in traffic congestion and degradation of air quality. • Should not build on the flood plain. • Green policy and outputs are not clear. • Green Infrastructure buffer zone should be at least 100m from Baydale Beck. • Not clear if traffic modelling justifies the housing allocation or the provision of new roads. Great Burdon • Increase in traffic congestion and degradation of air quality. • Should not build on the flood plain. • Green policy and outputs are not clear. • Green Infrastructure buffer zone should be at least 100m from the river Skerne. • Not clear if traffic modelling justifies the housing allocation or the provision of new roads. West Park Garden Village	(Sustainable Design Principles) requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption and how buildings have been made energy efficient thereby reducing carbon emissions. The locational strategy of Draft Local Plan also looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). Site statements within Appendix B also set out where sites lie within flood zones 2 and 3 and that development should be directed away from these areas. The layout of the Skerningham Masterplan Framework also ensures that areas at risk to flooding are avoided. The site statements in Appendix B for Coniscliffe Park (North and South) and Great Burdon set out that Baydale Beck and the river Skerne should be protected and green infrastructure enhanced. The environment chapter and associated policies, of the Draft Local Plan also set out general requirements on developments with regards to green infrastructure and biodiversity. Principles within the Draft Local Plan encourage suitable landscaping to new elements of road network where appropriate, however there is no evidence to support a 100m buffer zone. This would also significantly impact upon site viability. West Park Garden Village does have outline planning permission, issues raised will have been considered through the process of the	

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								• Increase in traffic congestion and degradation of air quality. • Green policy and outputs are not clear. • Not clear if traffic modelling justifies the housing allocation or the provision of new roads. • Any new road should have a 100m green infrastructure buffer zone. Development limits should be drawn to include only the proposed housing areas and not elements of green infrastructure. Developers will assume they can build to the development limit without providing the green infrastructure.	application e.g. impact on highways, traffic, the environment etc. The development limit has been drawn around the entire extent of the Skerningham Strategic Allocation site in the Local Plan in order to allow a comprehensive approach to be taken to the masterplanning of the whole site, and to ensure the delivery of improvements to the Skerne Valley Area alongside development on Darlington's urban edge. The Masterplan Framework (Figure 6.1) illustrates the key principles for the development of the Skerningham site and will be the basis on which the emerging Masterplan is developed. As set out in Policy H 10, the Council will only approve planning applications that adhere with the masterplan for this site, and that deliver the necessary local and strategic infrastructure (including green infrastructure) to support the development.	
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 357	4.0.2	Paragraph	Object	We strongly object to the Skerningham Strategic Allocation (Policy H2). Our reasoning is set out in further sections.	Objection noted.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 198	Figure 4.1	Key Diagram	Object	Objections and concerns raised with regards to four strategic sites. Skerningham • Not sustainable. • Increase in traffic congestion and degradation of air quality. • Should not build on the flood plain. • Green policy and outputs are not clear. • Green Infrastructure buffer zone should be at least 100m from the river Skerne.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Transport modelling work is ongoing to test highway mitigation schemes to ensure	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								• Not clear if traffic modelling justifies the housing allocation or the provision of new roads. • New roads should have a 100m green infrastructure buffer on either side. Coniscliffe Park • Not sustainable • Increase in traffic congestion and degradation of air quality. • Should not build on the flood plain. • Green policy and outputs are not clear. • Green Infrastructure buffer zone should be at least 100m from Baydale Beck. • Not clear if traffic modelling justifies the housing allocation or the provision of new roads. Great Burdon • Increase in traffic congestion and degradation of air quality. • Should not build on the flood plain. • Green policy and outputs are not clear. • Green Infrastructure buffer zone should be at least 100m from the river Skerne. • Not clear if traffic modelling justifies the housing	developments do not have an unacceptable impact on local and strategic highway network. Impacts of air pollution have been considered via the sustainability appraisal process. There are a number of planning policies in the Draft Local Plan which aim to prevent new development from contributing to unacceptable levels of air pollution. For example DC 1 (Sustainable Design Principles) requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption and how buildings have been made energy efficient thereby reducing carbon emissions. The locational strategy of Draft Local Plan also looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). Site statements within Appendix B also set out where sites lie within flood zones 2 and 3 and that development should be directed away from these areas. The layout of the Skerningham Masterplan Framework also ensures that areas at risk to flooding are avoided. The site statements in Appendix B for Coniscliffe Park (North and South) and Great Burdon set out that Baydale Beck and the river Skerne should be protected and green infrastructure enhanced. The environment chapter and associated policies, of the Draft Local Plan also set out general requirements on developments with regards to green infrastructure and biodiversity.	

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								allocation or the provision of new roads. West Park Garden Village • Increase in traffic congestion and degradation of air quality. • Green policy and outputs are not clear. • Not clear if traffic modelling justifies the housing allocation or the provision of new roads. • Any new road should have a 100m green infrastructure buffer zone. Development limits should be drawn to include only the proposed housing areas and not elements of green infrastructure. Developers will assume they can build to the development limit without providing the green infrastructure.	Principles within the Draft Local Plan encourage suitable landscaping to new elements of road network where appropriate, however there is no evidence to support a 100m buffer zone. This would also significantly impact upon site viability. West Park Garden Village does have outline planning permission, issues raised will have been considered through the process of the application e.g. impact on highways, traffic, the environment etc. The development limit has been drawn around the entire extent of the Skerningham Strategic Allocation site in the Local Plan in order to allow a comprehensive approach to be taken to the masterplanning of the whole site, and to ensure the delivery of improvements to the Skerne Valley Area alongside development on Darlington's urban edge. The Masterplan Framework (Figure 6.1) illustrates the key principles for the development of the Skerningham site and will be the basis on which the emerging Masterplan is developed. As set out in Policy H 10, the Council will only approve planning applications that adhere with the masterplan for this site, and that deliver the necessary local and strategic infrastructure (including green infrastructure) to support the development.	
Charles Johnson	Conservative Group			DBDLP460	Figure 4.1	Key Diagram	Object	Concerns regarding the visual legibility of the key diagram. The highlighting splits/blurs into other areas.	The purpose of the key diagram is to provide a strategic overview of the borough including the settlement hierarchy, strategic development allocations proposed, key transport routes/links and potential future infrastructure. Some of the allocations (shading) deliberately overlap to indicate integration with existing areas.	No change recommended
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP1021	Figure 4.1	Key Diagram	Object	LCMPC agree that the majority of new development should be located within the Darlington urban area and within settlement limits (policy SH1). However, it is noted that on the key diagram, the proposed strategic housing location at Coniscliffe Park, lies outside	The purpose of the key diagram is to provide a strategic overview of the borough including the settlement hierarchy, strategic development allocations proposed, key transport routes/links and potential future infrastructure. The development limits are not shown on the key diagram. However the strategic sites, including	No change recommended

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								the identified urban area. LCMPC therefore object to the key diagram, as it does not reflect the intention of policy SH1.	Coniscliffe Park, are within the limits on the draft policies map and therefore within the main urban area, according with policy SH 1.	
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1211	Figure 4.1	Key Diagram	Object	Modify the Key Diagram to identify the Airport as 'key strategic location' for growth during the Plan period.	It is not considered appropriate at this time to identify the airport as a Strategic Growth Location, this will however be kept under review.	No change recommended
Mr Neil Muto				DBDLP 772	4.0.3	Paragraph	Object	Objection that the paragraph states that we are near to an international airport. There is a small number of flights to Amsterdam and some holiday destinations. The airport is also earmarked for housing.	Concerns noted however the airport has recently been purchased by Tees Valley Combined Authority and a new operator appointed. The intention is for the airport to offer additional flights in the future and to enhance this important national transport link. The airport did have planning permission for residential development on land which did not affect its operations. However this permission has lapsed and Tees Valley Combined Authority have indicated that they have no intention of pursuing housing development at the airport.	No change recommended
Kieron Warren				DBDLP 282	4.0.4	Paragraph	Neutral	This paragraph establishes Darlington as a "strategic public transport hub". In order to fulfill this as part of the settlement hierarchy, consideration could be made for improving links between Darlington Railway Station and the rest of the town, perhaps through a transport interchange. This could improve access to employment opportunities and highlight good connectivity to employers / businesses.	The Council is working with the Tees Valley Combined Authority on a masterplan for Bank Top station. One of this issues being looked at includes linkages with the town centre and how connectivity can be improved including improved interchange facilities. Since consultation took place a new pedestrian footbridge has also been installed to provide improved access between the station and central park.	No change recommended
b everington				DBDLP 275	4.0.5	Paragraph	Object	This statement is completely at odds with the local plan, the priorities seem to be given to development of green land that is unaccessible , and destroys heritage,nature conservation and and land extensively used for recreation by the darlington population at large.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended
Mrs				DBDLP 517	4.0.5	Paragraph	Object	This statement is contrary to the local plan which proposes development on	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended

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Lisa Bramfitt								greenfield sites which are inaccessible and require new transport routes. Development of these sites destroy heritage and nature conservation, increase the risk of flooding and remove land extensively used for recreation by existing residents.		
Kieron Warren				DBDLP283	4.0.7	Paragraph	Neutral	In relation to improving links between the Town Centre Fringe, the Town Centre, Central Park and the main Railway Station; consideration and importance should be given to developing efficient and effective public transport and cycle links. This could be done in order to encourage sustainable transport and reduce car usage in Darlington.	Comments noted. These issues of public transport, cycle and walking links will be a key consideration in new development and regeneration in the Town Centre Fringe. These principles are also set out within policy IN 2: Improving Access and Accessibility and will be expected of new development.	No change recommended
Hellens Land		mr Baker		DBDLP790	4.0.8	Paragraph	Support	Support for the Council's approach to selecting broad locations for new housing and in particular the recognition that "the urban fringe has been identified as the most sustainable, suitable, available and developable" location for growth. Support for the identification of Greater Faverdale as a proposed allocation and the Council's conclusions that it is a sustainable location for future economic and housing growth in the borough.	Support noted	No change recommended
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP1256	4.0.8	Paragraph	Support	Support of paragraph 4.0.8, identifying "the urban fringe has been identified as the most sustainable, suitable, available and developable" location for new housing development.	Support noted	No change recommended
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP37	4.0.9	Paragraph	Object	There are other villages which are well placed to accommodate some development which would assist in providing a range of sites. An example is Neasham which has some services and a community which future residents can support and benefit from.	Allocating sites for housing in the rural villages does not accord with the locational strategy of the Draft Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will be able to provide) the level of services, facilities and employment opportunities that are required to	No change recommended

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									support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development. Some housing development will be permitted in rural areas, such as rural exception sites, infill development and housing required to support the rural economy, providing they accord with all relevant national and Local Plan policies.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 592	Statement 1	Service Villages	Support	CPRE supports this policy.	Support noted	No change recommended
Ms Nicole McLaren				DBDLP 625	Statement 1	Service Villages	Object	Comments submitted regarding Hurworth. Primarily commenting on poor design and lack of variety in the committed developments on Roundhill Road. Lack of recreation space and play equipment within the village. Road safety and in particular speeding.	No further development is proposed around Hurworth or Hurworth Place other than the committed sites on Roundhill Road (Sites 103 and 333). Matters relating to the existing permissions cannot be revisited in the local plan. The perceived lack of recreational space in the village is noted but there are significant areas of accessible informal greenspace around Hurworth and Hurworth Place including the Village Green and the Banks of the River Tees at Hurworth Place. Speed limits are a highways matter and can be altered where there are justified concerns over safety. Provision of a new cycle route is a long term aspiration of the council should funding be made available. It is raised in paragraph 10.1.21 of the Draft Plan and is supported by Policy IN1.	No change recommended
Mr A Macnab	Middleton St George Parish Council			DBDLP 810	Statement 1	Service Villages	Object	Reference made to early engagement with the Parish Council and village in 2017/2018. Workshops were held with the Parish Council and key stakeholders in the village; a vision as well as a	Comments and objections noted. The vision and draft spatial plan for the village were devised in the early engagement work both of which fed into the Draft Local Plan. It is	No change recommended

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								number of high level objectives were agreed. A spatial plan was also developed for the village. This work was to form part of the Draft Local Plan currently being consulted on. Concerns raised that there is no evidence in the Draft Local Plan with regards to how the vision will be achieved. Whilst Middleton St George is categorised as a service village in the plan there are concerns with the sustainability of the village. • The GP service is no longer located within 1km of the centre of the village. • Bus service is only hourly weekdays until 6pm and does not serve the GPs surgery in its new location. • An improved bus service is required and this was agreed as a high level objective for the village in the early engagement. • The sustainability of the village should be reconsidered. • Infrastructure needs to be provided that residents ask for. • Improvement needed to narrow village roads. • Drainage and sewage systems are not adequate. Concerns raised with regards to the level of housing growth proposed in Middleton St George. The village has supplied a significant amount of the housing target figure (492 dwellings per annum) via existing commitments and potential allocations (site details	considered that the vision will be delivered via the borough wide policies of the Draft Local Plan, even though some of which do not specifically refer to the Middleton St George. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. Part of site 146 Land south of railway line, MSG is reserved for community facilities. This will ensure that if the GP surgery wishes to move to a more central location in the village in the future land is set aside for this. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Growth of the village will help to encourage a more frequent bus service. Contributions can be sought from developers in some circumstances to support new services however this is generally just for a short period. Further evidence base work is to be prepared on the sustainability of the service and rural villages. The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). Across the service villages more housing development is proposed at Middleton St George simply because the evidence base identified more sites which were available for development and had less physical constraints.	

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								provided). Cumulative total of 1,933 dwellings. The Council has now published its brownfield land register, there is potential for developing that land prior to doing so on greenfield sites. Vacant properties within the urban area should be refurbished first. In general the Parish Council agrees with the proposed development limit within the Draft Local Plan. However, development should be towards the A67 and not located in the centre of the village due to increased traffic congestion.	Please see officer response on brownfield sites, urban sprawl and empty homes. In addition sites on the brownfield land register and refurbishing empty homes would not be sufficient to meet the borough's quantitative housing need.	
Mr Derek Dalwell	Darlington Association of Parish Councils			DBDLP 1067	Statement 1	Service Villages	Object	Doubt that Service Villages can also support the needs of the Rural Villages and other rural areas, in the absence of even modest improvements in communications	The key function of service villages to provide some variety in housing choices and provide localised facilities for surrounding rural areas. It is hoped that reasonable population growth in these villages will help to sustain and potentially enhance service provision which may otherwise be lost the the main urban centre.	No change recommended
Kieron Warren				DBDLP 284	4.0.10	Paragraph	Neutral	Observation that improved links between service villages to Darlington Railway Station and Durham Tees Valley Airport could bring environmental, economic and employment benefits.	Comments noted and principle of improved connectivity is supported in numerous policies in the plan.	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 593	Statement 2	Rural Villages	Support	Policy supported	Support noted	No change recommended
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP 853	Statement 2	Rural Villages	Object	Statement 2 for rural villages does not confirm how local need for housing will be identified or measured.	Paragraph 6.6.2 related to policy H 6 Rural Exception sites provides further detail on this issue.	No change recommended

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Ken Walton				DBDLP336	5	DESIGN AND CONSTRUCTION	Object	Objection on design quality of new developments.	Agree with principle of improving design quality and this is supported by national policy (NPPF, 2018 Chapter 12).	No change recommended
Mr Christopher Bell	Highways England			DBDLP888	5	DESIGN AND CONSTRUCTION	Neutral	No comment.	n/a	No change recommended
Irene Ord	Listed Property Owner			DBDLP864		Sustainable Design Principles	Neutral	Should be a greater emphasis on quality and sympathetic design particularly when effecting the historic environment.	Agree with principle of improving design quality and this is supported by national policy (NPPF, 2018 Chapter 12). In relation to considerations for the historic environment this policy should be considered in tandem with Draft Policy ENV 1 and relevant national policy and guidance.	No change recommended
Mr Ralph Bradley				DBDLP116	Policy DC 1	Sustainable Design Principles	Support	Good design should be more strongly controlled by the local authority and not left to developers.	Through a combination of the draft local policies, adopted Design SPD and strengthened emphasis on design in the NPPF the local authority has sufficient tools to refuse poor design and seek improvements.	No change recommended
Charles Johnson	Conservative Group			DBDLP114	Policy DC 1	Sustainable Design Principles	Support	Support for good design.	Noted.	No change recommended
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP268	Policy DC 1	Sustainable Design Principles	Neutral	Solar panels should be integrated into all new houses.	Whilst the integration of solar panels would be encouraged in all housing development (unless there are overriding reasons on to include such as heritage) it is difficult to insist on all development including for viability reasons. However further consideration will be given to how energy efficiency in new development will be considered.	No change at present but we will look at energy efficiency and the wider climate change issue after the Local Plan has been approved to ensure a consistent approach with out Tees Valley neighbours.
Mrs Lisa Bramfitt				DBDLP519	Policy DC 1	Sustainable Design Principles	Neutral	Design principals set by the Council are key requirement for any developer. Ensuring developments deal with surface water drainage adequately also of concern.	Agree that quality design is important and this is supported by national policy. More detailed design guidance is provided in the Council's 'Design of new development SPD'. New development will also be required to deal with rainwater runoff adequately and there is more detail on this in Draft Policy DC 4 and the Design SPD.	No change recommended

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Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 594	Policy DC 1	Sustainable Design Principles	Support	Support.	Noted	No change recommended
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1024	Policy DC 1	Sustainable Design Principles	Support	Support for policy as drafted.	Support noted.	No change recommended
Marion Williams	Environment Agency			DBDLP 1272	Policy DC 1	Sustainable Design Principles	Neutral	The policy should be strengthened by aiming to reduce carbon emissions and the carbon footprint from developments.	The principles of this policy are adequate and backed up by section 5.1.8 - 5.1.10.	No change recommended
Hellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1329	Policy DC 1	Sustainable Design Principles	Object	Broad support but object to the wording of part b) on energy efficiency.	Additional detail on energy efficient design is contained in national guidance as well as the Design SPD. It is acknowledged that energy efficiency should be considered across the entirety of larger developments as some units may be compromised or there may be other constraints that take precedent.	No change recommended
Mrs Lisa Bramfitt				DBDLP 520	5.1.4	Paragraph	Support	Design statement for new Housing Supported	Noted.	No change recommended
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 677	5.1.8	Paragraph	Neutral	Suggestion that Stockton's approach as set out in their policies ENV2 and ENV3 be given consideration: https://www.stockton.gov.uk/media/876762/ex-sbc-10-local-plan-including-councils-suggested-modifications-5-february-2018.pdf Main modifications also relevant:	Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planning document.	No change at present but we will look at energy efficiency and the wider climate change issue after the Local Plan has been approved to ensure a consistent approach with our Tees Valley neighbours.

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								https://www.stockton.gov.uk/media/1584578/201809-v7-mm-schedule.pdf		
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP667	5.1.8	Paragraph	Neutral	Suggestion that Stockton's approach as set out in their policies ENV2 and ENV3 be given consideration: https://www.stockton.gov.uk/media/876762/ex-sbc-10-local-plan-including-councils-suggested-modifications-5-february-2018.pdf Main modification will also need to be factored in: https://www.stockton.gov.uk/media/1584578/201809-v7-mm-schedule.pdf	Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planning document.	No change at present but we will look at energy efficiency and the wider climate change issue after the Local Plan has been approved to ensure a consistent approach with out Tees Valley neighbours.
Simon Nicholson				DBDLP23	5.1.10	Paragraph	Support	Support for solar power in all development.	Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planning document.	No change at present but we will look at energy efficiency and the wider climate change issue after the Local Plan has been approved to ensure a consistent approach with our Tees Valley neighbours.
MR Mark Siddall				DBDLP109	5.1.10	Paragraph	Neutral	Provides an overview of the various best practice examples for housing standards as well as a number of policy examples from other authorities. A policy wording is suggested.	Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planning document.	No change at present but we will look at energy efficiency and the wider climate change issue after the Local Plan has been approved to ensure a consistent approach with our Tees Valley neighbours.

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MR Mark Siddall				DBDLP 437	5.1.10	Paragraph	Neutral	Energy Efficiency standard for new housing can be set under new NPPF	Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planning document.	No change at present but we will look at energy efficiency and the wider climate change issue after the Local Plan has been approved to ensure a consistent approach with our Tees Valley neighbours.
Miss Lucy Blakemore				DBDLP 14	5.2.2	Paragraph	Neutral	How will additional medical facilities be provided?	The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding.	No change recommended
Mrs Gwen Park				DBDLP 241	5.2.2	Paragraph	Object	Additional need for medical facilities with growth in Skerningham and West Park area.	The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding.	No change recommended
Mrs Lisa Bramfitt				DBDLP 522	5.2.2	Paragraph	Object	New medical facilities for new development sites not evidenced.	It is acknowledged that the provision of new heath facilities is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in suitable locations within key growth zones that hopefully would prove attractive	No change recommended

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									locations to provide new facilities should the opportunity and need arise.	
Charles Johnson	Conservative Group			DBDLP 115	Policy DC 2	Health and Wellbeing	Neutral	Suggest cars will remain the dominant form of transport for the foreseeable future.	Noted however the NPPF (Chapter 9) requires plans to favour the use of sustainable transport methods.	No change recommended
Mrs Gwen Park				DBDLP 179	Policy DC 2	Health and Wellbeing	Object	Increased air and noise pollution and traffic congestion in Whinfield will not be achievable as a result of the proposals at Skerningham.	Point f) relates to improving air, water and reducing noise pollution across the main urban area. It is acknowledged that some areas may have some negative impacts but overall improvements will be sought through the delivery of sustainable development and improvements to services and technology over the plan period.	No change recommended
Mrs Gwen Park				DBDLP 180	Policy DC 2	Health and Wellbeing	Object	Object to building on 'green belt'. Building and additional congestion will also have a negative effect on residents wellbeing. Specific concerns about crossing new access roads.	Darlington does not have any formally designated greenbelt however protection of green space across the borough is important. Skerningham Masterplan area would be required to incorporate a significant amount of publically accessible green space within it. Also see response to comment DBDLP178.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 199	Policy DC 2	Health and Wellbeing	Object	Support for concepts but objection to Skerningham and Coniscliffe Park. There should be a stronger emphasis on environmental benefits. Should provide a levy for green infrastructure management and maintenance.	Draft policies ENV 3 to ENV 8 are the main policies that protect environmental issues associated with development and the plan needs to be considered as a whole. Planning obligations for maintenance and management of landscaping and open space are set out in the Planning Obligations SPD which will be updated in due course.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 358	Policy DC 2	Health and Wellbeing	Object	Support principles of policy but object to Skerningham.	General support to policy noted. For more detailed comments see responses to Policy H10.	No change recommended
Canon Chris Beales				DBDLP 345	Policy DC 2	Health and Wellbeing	Support	Support for policy. Suggestion that it could be extended to include greater control over hot food takeaways.	On the back of Healthy New Towns work the inclusion of options to restrict hot food takeaways will be reconsidered in line with latest practice.	No change needed as there is not enough evidence to support a policy restricting hot food takeaways and that any policy would have any impact on obesity with phone apps such as 'Just Eat'. The

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										Inspector at the Stockton on Tees Plan Examination removed their policy because of lack of evidence.
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 835	Policy DC 2	Health and Wellbeing	Support	Support in context of Skerningham proposal.	Support noted.	No change recommended
Mr Roger Fitzpatrick-Odahamier				DBDLP 972	Policy DC 2	Health and Wellbeing	Object	Loss of agricultural land and countryside will have a negative on food productions as well as the health and wellbeing of residents.	Although the proposal at Skerningham would result in the loss of agricultural land where survey data exists this confirms that the land is class 3b i.e. not the best and most versatile. In relation to the wider countryside existing public rights of way will be protected and publically accessible green space will be integral to the masterplan. See paragraphs 6.10.9, 6.10.11 and 6.10.12 of the draft plan and more detailed responses to Policy H10.	No change recommended
Mr Brian Jones	Sadberge and Middleton St George Councillor			DBDLP 978	Policy DC 2	Health and Wellbeing	Support	General support but would like to see improved public transport to access health facilities	The provision of improved public transport throughout the borough is something the council would support. Routes have to operate on a commercial basis with limited money available to subsidies routes. The sustainable transport and planning teams continue to liaise with public transport operators to provide more frequent and convenient services.	No change recommended
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP 953	Policy DC 2	Health and Wellbeing	Support	General support but would like to see improved public transport to access health facilities	The provision of improved public transport throughout the borough is something the council would support. Routes have to operate on a commercial basis with limited money available to subsidies routes. The sustainable transport and planning teams continue to liaise with public transport operators to provide more frequent and convenient services.	No change recommended
Steve York	Sadberge and Middleton St George Councillor			DBDLP 990	Policy DC 2	Health and Wellbeing	Support	General support but would like to see improved public transport to access health facilities	The provision of improved public transport throughout the borough is something the council would support. Routes have to operate on a commercial basis with limited money available to subsidies routes. The sustainable transport and planning teams continue to liaise with	No change recommended

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									public transport operators to provide more frequent and convenient services.	
Mrs Lisa Bramfitt				DBDLP 523	5.2.11	Paragraph	Neutral	Support of Policy however implementation process poses a question.	As previously stated the provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 200	5.2.12	Paragraph	Support	Support of community infrastructure on strategic sites. Developers should fund provision of facilities.	The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 362	5.2.12	Paragraph	Object	Objection on the grounds of lack of certainty surrounding funding of heath care facilities.	The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding.	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 597	5.2.12	Paragraph	Object	Objection on the grounds of lack of certainty surrounding funding of heath care facilities.	The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard	No change recommended

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									land in key growth zones however delivery of new facilities will be dependent on NHS/private funding.	
Canon Chris Beales				DBDLP 346		Safeguarding Amenity	Support	Support for combining facilities.	Support noted.	No change recommended
Charles Johnson	Conservative Group			DBDLP 117	Policy DC 3	Safeguarding Amenity	Object	Would like to see planting and maintenance of trees incorporated within the policy.	Currently requirements for provision and maintenance of green infrastructure is dealt with within the Planning Obligations SPD.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 359	Policy DC 3	Safeguarding Amenity	Support	Support for amenity policy as drafted.	Support noted.	No change recommended
Mrs Lisa Bramfitt				DBDLP 526	Policy DC 3	Safeguarding Amenity	Support	Developers should be more accountable for the upkeep of public realm and landscaping.	Responsibility for maintenance of open space is something developers contribute to via planning obligations as set out in the Planning Obligations SPD. Roundabouts are typically within the adopted public highway so that typically falls to the local highway authority to maintain.	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 598	Policy DC 3	Safeguarding Amenity	Support	Support for policy as drafted.	Support noted.	No change recommended
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1025	Policy DC 3	Safeguarding Amenity	Support	Support for policy as drafted.	Support noted.	No change recommended
Mr Roger Fitzpatrick-Odahamier				DBDLP 977	Policy DC 3	Safeguarding Amenity	Object	Objection to Skerningham on the grounds of loss of amenity afforded by greenspace and views (it is acknowledged by the respondent that 'there is no right to a view' however the countryside does contribute to a feeling of wellbeing).	As acknowledged there is no right to a view however this does not mean that existing properties will not have their residential amenity protected. Draft Policy DC 3 and the council's design SPD set a number of requirements developments need to fulfil in order to maintain acceptable levels of amenity in both existing	No change recommended

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									and proposed development. These include minimum separation distances. In relation to the wider countryside existing public rights of way will be protected and publically accessible green space will be integral to the masterplan. See paragraphs 6.10.9, 6.10.11 and 6.10.12 of the draft plan and more detailed responses to Policy H10.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1331	Policy DC 3	Safeguarding Amenity	Object	Generally supportive of policy as drafted however objection is raised to the resistance of excessive HGV movements. Objection also raised to the supporting text at 5.3.5 in relation to location of rooms on the basis it is not justified.	The resistance to excessive HGV movements has been in place for some time in the existing plan and is good practice for both amenity and safety. It's primary aim is to resist new commercial development generating excessive HGV movements on residential roads. In relation to guidance on location of rooms it appears there has been some misunderstanding of what is quite standard practice to locate compatible room uses in adjacent properties next to each other. It appears to have been read on a restriction within existing properties which is not the case.	No change recommended
Marion Williams	Environment Agency			DBDLP 1278	5.3.3	Paragraph	Neutral	Should be strengthened by including reference to discourage sensitive uses being located near to significant sources of air pollution.	No objection to including this consideration but this is covered within the Adopted Design SPD (Page 25) which is probably the more appropriate location.	No change recommended
Marion Williams	Environment Agency			DBDLP 1298		Flood Risk and Sustainable Drainage Systems	Neutral	SFRA needs to be produced to support plan.	Draft version of SFRA has been provided and final version will be published before next stage.	No change recommended
Mrs Lisa Bramfitt				DBDLP 533	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Object	There will be a detrimental impact on water discharge as a result of the Skerningham development.	Housing schemes of this size are required to provide adequate sustainable drainage (Para 163 of NPPF).	No change recommended
Mr Mike	Durham County Council			DBDLP 1048	Policy DC 4	Flood Risk & Sustainable Drainage	Neutral	No objection.	Noted.	No change recommended

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Allum						Systems (SUDS)				
Paul Hunt	Persimmon Homes			DBDLP 1181	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Support	Support for policy as drafted.	Support noted.	No change recommended
Marion Williams	Environment Agency			DBDLP 1296	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Neutral	Environment Agency have provided details of current guidance on Sequential Tests and Exemption Tests.	This information has been passed to our Development Management team so it can be used in the validation and pre-application process.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1332	Policy DC 4	Flood Risk & Sustainable Drainage Systems (SUDS)	Object	Broad support for the approach but object to the wording which should be more flexible so it can adapt to changing circumstances throughout the plan period.	The council has consulted the Environment Agency and other statutory bodies in relation to this draft policy and appropriate modifications have been made. Local planning authorities are required to review their plans once adopted at least every 5 years which will enable further changes if required.	No change recommended
Mrs Laura Roberts	Northumbrian Water			DBDLP 735	5.4.7	Paragraph	Support	Support for link between GI and SUDS.	Noted.	No change recommended
Charles Johnson	Conservative Group			DBDLP 118	Policy DC 5	Skills and Training	Neutral	University Technical Collages are the main source of skill training.	Universities and Colleges have an important role to play in skills and training but this policy is primarily aimed at securing some opportunities directly associated with the developments proposed in the plan.	No change recommended
Ken Walton				DBDLP 337	Policy DC 5	Skills and Training	Neutral	Plan should promote quality, well paid jobs and apprenticeships.	This policy is primarily aimed at securing some opportunities directly associated with the developments proposed in the plan. Otherwise the planning system has limited control over the nature and types of jobs created.	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 600	Policy DC 5	Skills and Training	Support	Support for policy as drafted.	Noted.	No change recommended

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Paul Hunt	Persimmon Homes			DBDLP1182	Policy DC 5	Skills and Training	Neutral	Alternative wording suggested: *"The Borough Council will encourage all local employers to participate in skills and employment training initiatives to increase access to employment for those who live within the area. Where development proposals would generate a significant number of construction and operational phase jobs, the Borough Council will seek to enter into a S106 Agreement to secure appropriate commitments and targets for employment skills and training, including apprenticeships appropriate to the development proposed. Where firms already run existing training programmes / apprenticeships this policy would not apply provided they can demonstrate these will include residents of the Borough"*	The exemption for builders with existing programmes (subject to demonstrating this will include builders from within the borough) is acknowledged within the reasoned justification of the plan. It is not considered necessary to include specific reference in the policy box.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1333	Policy DC 5	Skills and Training	Neutral	Generally supportive but alternative wording suggested to allow more flexibility.	Paragraph 5.5.3 makes it clear this requirement would only be sought 'were relevant and feasible'.	No change recommended
Catton Chris Beales				DBDLP347	5.5.1	Paragraph	Support	Support for role of skills and education.	Noted.	No change recommended
Miss Lucy Blakemore				DBDLP15	5.5.2	Paragraph	Support	Support for encouraging inward investment and improving skills.	Noted.	No change recommended
Mr Christopher Bell	Highways England			DBDLP889	6	HOUSING	Neutral	Housing requirement and target noted. Any housing development that is likely to generate trips at the Strategic Road Network (SRN) will need to demonstrate that their impact will not be severe at the SRN. Further comments on the individual site locations are provided. The cumulative	Comments noted. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended.

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								impact of the proposed housing allocation will also be considered.		
Ms Michelle Saunders	North Yorkshire County Council			DBDLP 1070	6	HOUSING	Support	We welcome the commitment to deliver housing which meet the needs and aspirations of those living and working in the borough. We acknowledge that a significant proportion of this housing (circa 3000) is already committed within existing planning permissions. It is further noted that two large scales planning permissions are included close to the boundary with North Yorkshire. DBC should ensure that adequate provision of infrastructure is provided on and off site to service the requirements of growth within this area and any cross-boundary impacts arising.	Support noted. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development.	No change recommended.
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1173	6	HOUSING	Support	In the main Bellway are supportive of Darlington Borough Council's proposed Housing Policy and their aspirations for housing delivery aside to specific objections highlighted in other representations. More specifically Bellway fully support site reference no. 392 'Elm Tree Farm' and strongly advise/recommend that it is retained in the 5 year housing land supply trajectory plans for short term delivery. The site is considered to be highly sustainable and is logical in its positioning for an urban extension. Further to this, preliminary assessments undertaken to inform a potential detailed planning application demonstrate that the site is predominantly unconstrained by environmental considerations and is not located within an area of high landscape or cultural heritage value or ecological sensitivity.	Support noted.	No change recommended.
Mrs Sally				DBDLP 158	6.0.2	Paragraph	Object	Brownfield sites should be developed instead of countryside.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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Mr Neil Minto				DBDLP781	6.0.2	Paragraph	Object	Brownfield sites should be developed instead of countryside.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Paul Howell				DBDLP323	6.0.3	Paragraph	Neutral	Concerns that development proposals are not clearly aligned with infrastructure improvements. There should be an association between the delivery of road solutions and the building of houses.	An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. Transport modelling work is also ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Timing of infrastructure delivery will also be considered in the above evidence base work and secured through the planning application process.	No change recommended.
Carlton Chris Beales				DBDLP348	6.0.4	Paragraph	Support	Concerns raised: • Housing mix will not be achieved in the current market driven system. • Private housebuilders are not constructing homes for an aging population (e.g. bungalows). • Not enough affordable homes being built. • Social cohesion in new communities. • Employment levels may be negatively effected by new technologies, automation.	Policy H 4 aims to encourage a mix of new homes including market and specialised housing suitable for older people. Policy H 5 also requires a proportion of affordable homes from market schemes. Policies and guidance within the Draft Local Plan and Design of New Development SPD (2011) encourage planning principles which promote social cohesion. Please see officer response on housing requirement and standard method with regards to employment levels.	No change recommended.
Mr David Clark				DBDLP56	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast is 177 per annum for Darlington. Questioned if the 10,000 new homes needed in the plan is based	Please see officer response on housing requirement and standard method.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								on the 7,000 new full time jobs and additional workers needed.		
Mr Tim Ellis				DBDLP 87	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast is 177 per annum for Darlington. Immigartion should be brought under control via Brexit therefore this is the wrong time to assess future population growth.	Please see officer response on housing requirement and standard method. The impacts of Brexit on migration is unclear therefore long term migration trends have been utilised to inform the housing requirement and housing target. The likely effects will be kept under review and can be considered further in future Local Plan reviews when more information on the impacts are available.	No change recommended.
Mr Simeon Hope				DBDLP 247	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast is 177 per annum for Darlington.	Please see officer response on housing requirement and standard method.	No change recommended.
Alan Hutchinson	Whinfield Residents Association			DBDLP 164	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington which DBC state are flawed. DBC figures are based on assumptions and estimates. They are significantly different from the ONS figures.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr Ralph Bradley				DBDLP 112	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast is 177 per annum for Darlington. Concerns raised: • Impacts of housing growth on infrastructure and local services. • Dispute the statement "substantial majority of the employed population both live and work in the town"	Please see officer response on housing requirement and standard method. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. Evidence within Part 1 of the Strategic Housing Market Assessment 2015 shows that 71.2% of people who live in Darlington also work in Darlington. From the other perspective 64.7% of those who work in Darlington also live there (source: 2011 Census).	No change recommended.
Charles Johnson	Conservative Group			DBDLP 119	Policy H 1	Housing Requirement	Neutral	Calculations of housing need disputed. Market forces will determine how many dwellings are built.	Please see officer response on housing requirement and standard method. Although market forces will largely drive how many	No change recommended.

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									dwellings are built, the Council has to make an assessment of housing need and allocate sufficient land to accommodate this need over the plan period. If the market does not deliver as anticipated sites will simply not be developed and can come forwarded at a later time.	
Mrs Gwen Park				DBDLP 181	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Government recommended figure is 177 dwellings per annum. Concerns raised: • Developers have yet to build or sell the houses planned at West Park and Central Park. • Brownfield sites should be developed first.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. Sites which have planning permission and are building out, such as West Park and Central Park, are acknowledged in the draft Local Plan and contribute to meeting the identified housing need. Their estimated delivery is set out within Appendix A Housing Trajectory.	No change recommended.
Mrs Donna Greenhow				DBDLP 183	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast is 177 per annum for Darlington. As such there is no need to develop sites within the countryside. Brownfield sites should be prioritised including the regeneration of the town centre which is losing big retailers.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Simon Bainbridge				DBDLP 400	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concerns raised: • House prices have been static therefore supply is meeting demand. • DBC figure is based on assumptions and estimates. • Migration difficult to estimate. • Brexit and contraction of the town centre will result in	Please see officer response on housing requirement and standard method.	No change recommended.

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								static employment levels at best.		
b everington				DBDLP 276	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington. Concerns raised: • No evidence to support the higher figure. • Population growth since 2011 has been minimal. • House prices and rental values remained the same or decreased, showing supply is meeting demand. • Town centre contracting. • Durham County Council have utilised the governments calculations despite significant investment in the area.	Please see officer response on housing requirement and standard method. Durham County Council's use of the standard method for calculating housing need has been noted. Darlington Council's approach is explained in the officer response referenced above.	No change recommended.
Alan William Macnab				DBDLP 184	Policy H 1	Housing Requirement	Object	Governments housing need figure for Darlington is 177 dwellings per annum. No exceptional circumstances put forward to justify Draft Local Plan figure of 422 dwellings per annum. This figure may not be reached for a number of reasons: • The effects of Brexit on the economy which have not been factored into the target. • 7,000 new jobs not necessarily well paid to purchase new homes. • There is not a demand for the type of homes which are being built.	Please see officer response on housing requirement and standard method. The jobs forecast of 7,000 (FTE) over the plan period is based on past trends of employment growth and evidence work does look at an estimated sector split of these jobs (Darlington Future Employment Needs Report September 2017). If the need does not arise for new homes which are related to jobs growth as predicted, they will not be built by developers. However it is important that suitable sites are identified via allocations if the need does arise. Policy H 4 aims to encourage a mix of new homes in terms of size and tenures which meet local needs as identified within the most up to date Strategic Housing Market Assessment or by other evidence.	No change recommended.

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								Concerns that the appropriate infrastructure will not be provided.	An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP 203	Policy H 1	Housing Requirement	Neutral	Housing requirement / target disputed. Concern if 7,000 new jobs is achievable or sustainable.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 206	Policy H 1	Housing Requirement	Object	Housing requirement and target disputed and considered excessive and unnecessary particularly given local economic issues and Brexit. Questioned whether 7,000 new jobs is achievable or sustainable.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr Simeon Hope				DBDLP 246	Policy H 1	Housing Requirement	Object	Projected number of dwellings required disputed and based on very little evidence. Concerns raised: • Dwellings required designed to appeal to landowners and developers. • Will result in urban sprawl and the destruction of green areas. • There are brownfield sites which should be developed for housing. Housing plan should take more account of avoiding urban sprawl, the ecology of green areas and avoiding air pollution from traffic.	Please see officer response on housing requirement and standard method and response on brownfield sites, urban sprawl and empty homes. Policy H 4 aims to encourage a mix of new homes in terms of size and tenures which meet local needs as identified within the most up to date Strategic Housing Market Assessment or by other evidence. The impacts of the Draft Local Plan on the natural environment has been considered via the Housing and Employment Land Availability Assessment and the Sustainability Appraisal which was also published for consultation and is still available on the Council's website. The Local Plan should be read as a whole and includes policies on green infrastructure, biodiversity and the protection of the countryside. The Draft Local Plan seeks to minimise vehicle emissions through its locational strategy and a number of complimentary policy requirements. The strategy looks to locate development in sustainable locations reducing the need to travel	No change recommended.

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									to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles.	
Mr Andrew Ward				DBDLP 196	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concerns raised: • Where are the households coming from. • Housing shortage is in the south east not the north east. • Brexit may result in a decrease in migration therefore demand will reduce. • Low to medium rise apartments should be considered to cater for smaller household size. Therefore requiring less land. • Government Ministers have said that the house building programme will not threaten green belt land. • DBC state that ONS figures are flawed and applied their own figures from a consultancy. This assessment should be independently assessed.	Please see officer response on housing requirement and standard method. The housing requirement in the plan will be assessed by an independent planning inspector, appointed by the government, at a Local Plan examination. This will take place once the plan has been submitted to the planning inspectorate. It is acknowledged that there is more pressure in the south east for new homes, however, the Council is still required to plan for identified housing need in the Local Plan. The impacts of Brexit on migration is unclear therefore long term migration trends have been utilised to inform the housing requirement and housing target. The likely effects will be kept under review and can be considered further in future Local Plan reviews when more information on the impacts are available. Policy H 4 aims to encourage a mix of new homes in terms of size and tenures which meet local needs as identified within the most up to date Strategic Housing Market Assessment or by other evidence. Darlington does not have any designated green belt. This is a formal designation typically found in larger urban areas to prevent settlements merging. Please see officer response on brownfield land, urban sprawl and empty homes.	No change recommended.
Mr M Gardner				DBDLP 189	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Many new homes have been built in the past. Concerns regarding the impact on the road network and additional congestion.	Please see officer response on housing requirement and standard method. The Local Plan identifies the housing need for the plan period 2016-36; any dwellings constructed during this period will contribute towards meeting the housing requirement and housing target of the plan. Homes built prior to 2016	No change recommended.

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									therefore do not contribute to meeting the housing requirement and housing target of the plan. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	
Maria Jabs				DBDLP 253	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts Government's standard methodology requirement of 177 dwellings per annum. If further housing is required an alternative location should be sought.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Anne Rudkin				DBDLP 255	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts Government's standard methodology requirement of 177 dwellings per annum without justification.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr John Rudkin				DBDLP 290	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement of 177 dwellings per annum without justification.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr James Wilson Chalk				DBDLP 447	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concerns raised: • Number suggests an increase in the number of high quality / paid jobs coming to the town so that potential owners can afford the cost. • Alternative is that Darlington becomes a dormitory town which could have undesirable consequences.	Please see officer response on housing requirement and standard method. The jobs forecast of 7,000 (FTE) over the plan period is based on past trends of employment growth and evidence work does look at an estimated sector split of these jobs (Darlington Future Employment Needs Report September 2017). If the need does not arise for new homes which are related to jobs growth as predicted, they will not be built by developers. However it is important that suitable sites are identified via allocations if the need does arise.	No change recommended.

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Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 361	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concerns raised: • DBC should be using the standard method figure of 177. No "exceptional circumstances" have been put forward to justify the Local Plan figures. • Figures used in ORS report are based on estimates and assumptions. • House and rental values have remained static therefore it appears that supply is meeting demand. • No mention of the effect of Brexit or the contraction of the town centre. • 7,000 new jobs seems aspirational rather than realistic.	Please see officer response on housing requirement and standard method.	No change recommended.
Mrs Jennifer Bradley				DBDLP 451	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast of 177 per annum for Darlington. Also disagree with the statement that *'substantial majority of the employed population both live and work in the town'*.	Please see officer response on housing requirement and standard method. Evidence within Part 1 of the Strategic Housing Market Assessment 2015 shows that 71.2% of people who live in Darlington also work in Darlington. From the other perspective 64.7% of those who work in Darlington also live there (source: 2011 Census).	No change recommended.
Mrs Karen Gannon				DBDLP 468	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Exceeds the standard method figure outlined in the NPPF. No justification or evidence to increase these figures.	Please see officer response on housing requirement and standard method.	No change recommended.
Mrs Lisa Bramfitt				DBDLP 534	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested	Please see officer response on housing requirement and standard method. The housing target of 492 dwellings is aspirational as it makes an allowance for 7,000 (FTE) new jobs over the plan period. It is also however realistic	No change recommended.

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								requirement of 177 dwellings per annum. Concerns raised: • The Plan states that the housing requirement is a balance between 'achievability and aspiration'. I disagree that housing requirement should be based upon aspiration – it should be based upon trends and forecasts. • Objection to the method to calculate the housing need in the plan as it does not follow the standard method and it does not detail an exceptional circumstance which would justify an alternative approach.	as it is based on past trends of employment growth in the borough.	
Mrs Lisa Bramfitt				DBDLP 535	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement of 177 dwellings per annun without justification. Concerns raised on the development of greenfield sites.	Please see officer response on housing requirement and standard method and response on brownfield sites, urban sprawl and empty homes. Policy H 4 Housing Mix requires proposals for housing developments to provide an appropriate mix of housing types, sizes and tenures which meet local needs as identified in the most up to date Strategic Housing Market Assessment or by other evidence.	No change recommended.
Paul Littleton				DBDLP 508	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concerns raised. • Attention should be on other areas such as town centre. There are many empty properties in the town that could be utilised.	Please see officer response on housing requirement and standard method and response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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								• Urban sprawl into the countryside. Utilise brownfield sites first.		
Mrs C Everington				DBDLP 528	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement of 177 dwellings. Concerns raised: • Population has remained static recently. • Rental prices static, suggesting supply meets demand. • Questionable if homes which are being built actually meet needs. • 7,000 jobs estimate is questionable.	Please see officer response on housing requirement and standard method. Policy H4 aims to encourage a mix of new homes in terms of size and tenures which meet local needs as identified within the most up to date Strategic Housing Market Assessment or by other evidence. The jobs forecast of 7,000 (FTE) over the plan period is based on past trends of employment growth and evidence work does look at an estimated sector split of these jobs (Darlington Future Employment Needs Report September 2017). If the need does not arise for new homes which are related to jobs growth as predicted, they will not be built by developers. However it is important that suitable sites are identified via allocations if the need does arise.	No change recommended.
Mrs Anne Bland				DBDLP 554	Policy H 1	Housing Requirement	Object	There is disagreement regarding number of new homes needed. An organisation have suggested some alternative sites for housing so that green space can be preserved.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.
G Martin				DBDLP 561	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement. Concerns that new homes would put pressure on infrastructure. If new homes are needed prioritise brownfield land.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) -			DBDLP 601	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement of 177 dwellings per	Please see officer response on housing requirement and standard method. With regards to the comments on the County Durham Plan; the SHMA Update 2017 does make an allowance for in commuters and out commuters	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
	Darlington Group							annum without justification. Concerns raised: • Creation of 7,000 jobs over the plan period questionable and not justified. • Regard not taken to housing provision in the County Durham Local Plan which includes a significant element for a Teesside workforce commuting in from south Durham. • Recommended requirement is 247 dwellings per annum. • A reduced housing requirement will mean it is not as difficult to meet the five year housing land supply.	for Darlington when calculating the homes needed for the additional 7,000 workers.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 602	Policy H 1	Housing Requirement	Object	Objection to final paragraph of the policy - it renders useless all the policy in the Plan and the consultation process if there is no longer a demonstrable supply of sites to fully meet the five year land requirement. Considers that the housing figure is vastly over inflated and the Council is effectively "set up to fail".	Please see officer response on housing requirement and standard method, housing requirement and housing target and also the response on the five year supply fall-back position. In addition, if the Council is in a position in the future where it cannot demonstrate a five year supply of deliverable sites the tilted balance of paragraph 11 of the NPPF (2018) would be engaged and decision makers will give appropriate weighting to other related (to the application) Local Plan policies.	Please see officer response to five year supply fall-back position.
Judith Murray				DBDLP 524	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington. Concerns raised: • The Plan states that the housing requirement is a balance between 'achievability and	Please see officer response on housing requirement and standard method. The housing target of 492 dwellings is aspirational as it makes an allowance for 7,000 (FTE) new jobs over the plan period. It is also however realistic as it is based on past trends of employment growth in the borough.	No change recommended.

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								aspiration'. I disagree that housing requirement should be based upon aspiration – it should be based upon trends and forecasts. • Objection to the methodology used to calculate the housing need in the Plan as it does not follow the standard method (NPPF para 60) and it does not detail any exceptional circumstances which would justify an alternative approach.		
Mr John Barker				DBDLP 673	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement of 177 dwellings per annum without justification.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr Peter Evans				DBDLP 568	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement of 177 dwellings which is more accurate.	Please see officer response on housing requirement and standard method.	No change recommended.
Franz Egarter				DBDLP 627	Policy H 1	Housing Requirement	Object	Questions the need for 10,000 new dwellings.	Please see officer response on housing requirement and standard method.	No change recommended.
Margaret Egarter				DBDLP 629	Policy H 1	Housing Requirement	Object	Questions the need for 10,000 new dwellings.	Please see officer response on housing requirement and standard method.	No change recommended.
Stockton-on-Tees Borough Council	Stockton-on-Tees Borough Council			DBDLP 727	Policy H 1	Housing Requirement	Support	Support that Darlington is considered as a separate Housing Market Area. SBC has no objections to the minimum requirement or housing target identified in the draft. In accordance with the duty to cooperate SBC is open to further engagement with Darlington Council as the Local Plan progresses.	Comments noted.	No change recommended.

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Mr McMain				DBDLP720	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts Government's suggested requirement of 177 dwellings per annum without justification. Concerns raised: • Amount of new jobs created over the plan period questioned. • The impact of Brexit also not taken into account.	Please see officer response on housing requirement and standard method.	No change recommended.
Mrs H Kilcran				DBDLP717	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts governments suggested requirement. Concerns regarding development on greenfield sites.	Please see officer response on housing requirement and standard method, and the response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Alan Hutchinson				DBDLP750	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts Government's suggested requirement of 177 dwellings per annum without justification.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr John Atkinson				DBDLP623	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts Government's suggested requirement of 177 dwellings per annum without justification.	Please see officer response on housing requirement and standard method.	No change recommended.
Miss Joanne Evans				DBDLP631	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. ONS projection more accurate. DBC should commission an independent projection to provide more certainty.	Please see officer response on housing requirement and standard method. The housing requirement in the plan will be assessed by an independent planning inspector, appointed by the government, at a Local Plan examination. This will take place once the plan has been submitted to the planning inspectorate.	No change recommended.
Mr Roger Fitzpatrick-Odahamier				DBDLP981	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Contradicts Government's standard methodology requirement of 177 dwellings per annum without justification. Concerns raised:	Please see officer response on housing requirement and standard method. The 2016 household projections were released in September 2018. Under normal circumstances the latest data is utilised to derive an areas housing requirement. However the	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								• No justification for deviating from the standard methodology. • Has the effect of Brexit on the economy and population growth been taken into account. • Population projections undertaken every 2 years. By the time a decision is made on this development your population forecasts will be out of date or will they be regularly revised. • Why is there a need for these homes when economic data suggests that residents will not be able to afford them. • Concern regarding the use of the term aspirational in the Local Plan.	Government announced in February 2019 that the 2016 projections should not be used in calculating housing need as this data shows very low levels of growth and authorities should continue to use the 2014 projections. As such the Strategic Housing Market Assessment has not been updated with the 2016 projections and in the next version of the Local Plan the minimum housing requirement is to be 177 net additional dwellings which is based on the 2014 projections. The housing target of 492 dwellings is aspirational as it makes an allowance for 7,000 (FTE) new jobs over the plan period. It is also however realistic as it is based on past trends of employment growth in the borough. The jobs forecast of 7,000 (FTE) over the plan period is based on past trends of employment growth and evidence work does look at an estimated sector split of these jobs (Darlington Future Employment Needs Report September 2017). If the need does not arise for new homes which are related to jobs growth as predicted, they will not be built by developers. However it is important that suitable sites are identified via allocations if the need does arise.	
Ms Helen McIntyre				DBDLP938	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concern that they are overestimated.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr Keith Stodart				DBDLP942	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington.	Please see officer response on housing requirement and standard method.	No change recommended.
Miss Katherine Workman				DBDLP945	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed.	Please see officer response on housing requirement and standard method.	No change recommended.

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Mr Simon Jones				DBDLP947	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed.	Please see officer response on housing requirement and standard method.	No change recommended.
Ms Laura Gardner				DBDLP959	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. Concerns raised: • Town centre is declining and houses are being built further away from it which will not help this situation. • Increased traffic congestion. • Empty buildings and brownfield sites should be developed first instead of greenfield sites.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. Town centres around the country are facing a number of challenges. Growth within the borough will generate increased expenditure in the town centre that will help to support the vitality and viability of the centre. A town centre first approach is also advocated in policy TC 1 for all main town centre uses and the Council is exploring other ways to encourage and promote the growth of the town centre. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended.
Ms Liz Knight				DBDLP960	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington.	Please see officer response on housing requirement and standard method.	No change recommended.
Mr Knight				DBDLP965	Policy H 1	Housing Requirement	Object	Annual housing target of 492 houses disputed. ONS forecast is 177 per annum for Darlington.	Please see officer response for housing requirement and standard method.	No change recommended.
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP1026	Policy H 1	Housing Requirement	Object	Concern that the level of development proposed is excessive and is not justified. Explanation within the SHMA noted with regards to household projections and adjusting the starting point of 160 dwellings per annum to 384 dpa. Concern that the relationship with adjoining authorities in terms of	Please see officer response on housing requirement and standard method. The relationship with adjoining authorities has been considered as part of the plan making process. Data and evidence within Part 1 of the Darlington SHMA (2015) indicated that the borough is generally a self contained housing market area. This is the geographical area within which a substantial majority of the	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								housing and the economy has not been fully considered. Evidence does not show a clear link between employment growth and the need for new homes. Significant departure from national household projections should be clear.	employed population both live and work, and where those moving house choose to stay. It is for this area which the Local Plan will address the housing needs. The officer response outlined above provides an overview of the jobs growth forecast over the plan period. Further detail can be viewed in the Darlington SHMA Update (2017) and the Darlington Future Employment Needs Report (2017) both of which are available on the Council's website. Factors considered in the SHMA Update (2017) included patterns of out commuting and in commuting of workers in the borough based on current trends.	
Mr Mike Allum	Durham County Council			DBDLP 1049	Policy H 1	Housing Requirement	Neutral	Departing from the Government's methodology means that DBC must fully justify its OAN to any future Local Plan Inspector. No further comment.	Comments noted. Please see officer response on housing requirement and standard method.	No change recommended.
Mr Derek Dodwell	Darlington Association of Parish Councils			DBDLP 1068	Policy H 1	Housing Requirement	Object	Housing requirement / target disputed. The plan should address: • How to encourage the use of brownfield sites. • A strategy for improving / bringing back into use existing stock.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Ms Julie Nixon				DBDLP 1369	Policy H 1	Housing Requirement	Object	Annual housing need of 492 houses disputed. Contradicts ONS forecast is 177 per annum for Darlington.	Please see officer response on housing requirement and standard method.	No change recommended.
Mrs Janine Lee				DBDLP 1375	Policy H 1	Housing Requirement	Object	Housing figure of 492 disputed. Contradicts standard method figure of 177 with no justification. Concerns raised: • Brownfield sites should be developed first.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. The Council is supportive of residential development in the town centre, however these	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								• Town centre should be developed first and use vacant shops for housing.	sites alone and the conversion of vacant shops would not be sufficient to meet quantitative housing needs. A mix of housing sites across the borough are required to meet both quantitative and qualitative housing needs.	
Major Frederick Greenhow MBE				DBDLP 92	6.1.2	Paragraph	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington. Concerns raised: • Development allowed without adequate infrastructure provision. • Impact on the countryside. • Brownfield sites should be prioritised.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development.	No change recommended.
Mr Philip Thornberry				DBDLP 157	6.1.2	Paragraph	Object	Concerns raised regarding traffic congestion particularly from the Skerningham site. No new housing should be built until the northern link road is completed.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. The northern link road (proposed link between the A66 and A1) is a project which is being led on by Tees Valley Combined Authority with support from the Council and is subject to Central Government funding. At this time it is unclear whether funding is available for the project. As such the modelling work which is being undertaken for the Local Plan considers both circumstances of it being provided or not provided. The growth strategy of the plan is not dependent on the delivery of the link road.	No change recommended.
Mr Ralph Bradley				DBDLP 128	6.1.2	Paragraph	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington. Concerns raised: • Brownfield sites should be prioritised.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								• Concerns regarding the impact / loss of the countryside.		
b everington				DBDLP 438	6.1.2	Paragraph	Object	Housing requirement / target disputed. Contradicts Government's standard methodology requirement. Concerns regarding loss of greenfield land.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mrs Jennifer Bradley				DBDLP 452	6.1.2	Paragraph	Object	Annual housing need of 492 houses disputed. ONS forecast is 177 per annum for Darlington. Concerns raised: • Brownfield sites should be prioritised. • Concerns regarding the impact / loss of the countryside.	Please see officer response on housing requirement and standard method, and response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Anthony Scarre				DBDLP 32	6.1.5	Paragraph	Object	Concerns raised regarding the housing requirement and target and where the people will come from who need these homes. Housing need should be based on the additional 3500 economically active households which are estimated by 2036 in the 2017 housing strategy.	Please see officer response on housing requirement and standard method. For clarification the document referred to is the Darlington SHMA Update (2017) which states at para 2.36 that the economically active population is likely to increase by 3,500 persons over the 20 year period 2016 - 36. This is a rounded figure. The issue raised is explained in the officer response referenced above.	No change recommended.
Mrs Lisa Bramfitt				DBDLP 536	6.1.5	Paragraph	Object	Concerns raised regarding the housing requirement and target and where the people will come from who need these homes. 3500 economically active households are estimated by 2036 in the 2017 housing strategy. Questioned if the housing need has been inflated for the Council's economic benefit (selling land).	Please see officer response on housing requirement and standard method. For clarification the document referred to is the Darlington SHMA Update (2017) which states at para 2.36 that the economically active population is likely to increase by 3,500 persons over the 20 year period 2016 - 36. This is a rounded figure. The issue raised is explained in the officer response referenced above.	No change recommended.

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									The housing requirement and housing target have not been increased to benefit the Council financially. The figures represent an objective assessment of housing need over the plan period, full details of which can be found in the Darlington SHMA Update (2017). A large proportion of the proposed housing allocations are in private ownership and the Council would not benefit financially from the land sale.	
Mr Neil Minto				DBDLP789	6.1.5	Paragraph	Object	The borough needs more affordable homes and so people can get onto the housing ladder. Higher value properties are not required.	Policy H 4 (Housing Mix) aims to encourage a mix of new homes in terms of size, type and tenure. Policy H 5 (Affordable Housing) seeks a proportion of affordable housing from residential schemes of a certain size. These policies will help to ensure that the correct type and tenure of new housing is delivered to meet the borough's housing needs.	No change recommended.
Mr Christopher Bell	Highways England			DBDLP890		Housing Land Supply	Neutral	Given the scale of housing proposed, an assessment of each site is needed in order to ascertain any potential for impact on the strategic road network.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended.
Amy ward	Planning Manager Barratt Homes			DBDLP1004		Housing Land Supply	Object	Recommendations/Concerns raised: • Council to review commitments to ensure still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development coming forward • Apply 20% lapse rate to existing commitments to account for permissions that will not be delivered. • Sites with no permission or outline permission must be supported by clear evidence that housing completions will being on site within 5 years	Comments noted. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable/developable. Consideration has been given to developer interest and physical site constraints. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. In view of this it has not been considered necessary to apply a 20% lapse rate to commitments. It is considered appropriate to have a number of the proposed allocations within the five year supply as there is clear evidence to support that these sites will be delivered within the five year period. A Court of Appeal decision confirmed that planning permission is not required for a site to be realistically deliverable over the next	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								• Increase housing requirement to account for this and provide further flexibility in the Plan • Review proposed delivery of site allocations as set out in the housing trajectory • Push all sites without planning permission outside of 5YLS • Ensure potential allocations deliverable in light of policy obligations in Local Plan • Review the commitments to ensure they are deliverable • Remove sites without planning permission • Allocate more sites to come forward in 5 years or justify potential allocations will deliver in 5 years • Proposed delivery appears to be high in parts of the trajectory. Amend the trajectory to reflect an average build out rate of 35 houses per annum • Apply a 20% buffer to the overall housing requirement. • Approach welcomed to not include contributions from windfall sites and brownfield regeneration schemes within the urban area in the housing allocations or trajectory.	five years and sites which are allocated in an emerging local plan can be suitable for inclusion in the supply figures. The likelihood that an authority will grant some planning permissions during the period was acknowledged in this decision. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. The housing trajectory has an average build out rate of 30 dwellings per annum on most sites. This has been increased where there is known to be more than one builder developing a site or more than one builder with an interest in a site.	
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 363	6.2.1	Paragraph	Object	Housing requirement / target disputed. The paragraph does not caution that sites may not be delivered as anticipated and that permissions may not be built out as quickly as expected.	Please see officer response on housing requirement and standard method. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									deliverable. Consideration has been given to whether sites have developer interest and physical constraints. There is also a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. This provides a level of flexibility in the plan if some sites weren't to come forward for development. Windfall sites, small sites and urban regeneration areas within the town centre fringe have also not been included in the housing supply figures to provide additional flexibility. It should also be noted that paragraphs 6.2.7 - 6.2.9 recognise that there is a possibility of under delivery and the Council will continually monitor delivery and the supply of sites. If there is a period of under delivery these paragraphs set out the actions the Council will take, including the fall-back position of policy H 1.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 603	6.2.1	Paragraph	Object	The paragraph does not caution that sites may not be delivered as anticipated and permissions may not be built out as quickly as expected. There is a history of developers not building homes they have permission for. Objection to housing requirement / target.	Please see officer response on housing requirement and standard method. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to whether sites have developer interest and physical constraints. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									plan period, post 2036. This provides a level of flexibility in the plan if some sites weren't to come forward for development. Windfall sites, small sites and urban regeneration areas within the town centre fringe have also not been included in the housing supply figures to provide additional flexibility. It should also be noted that paragraphs 6.2.7 - 6.2.9 recognise that there is a possibility of under delivery and the Council will continually monitor delivery and the supply of sites. If there is a period of under delivery these paragraphs set out the actions the Council will take, including the fall-back position of policy H 1.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP 207	6.2.2	Paragraph	Support	Darlington Friends of the Earth notes that whilst DBC considers it has a requirement for 8,440 dwellings, the Plan has sufficient land for approximately double this.	Support noted.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 364	6.2.2	Paragraph	Object	Objection to the plan identifying land to accommodate 16,000 new dwellings which is double the housing requirement of 8,440. Over allocation of land could result in the larger sites not being comprehensively developed. Remove Skerningham allocation to alleviate this uncertainty.	Concerns noted. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. This provides a level of flexibility in the plan if some sites weren't to come forward for development. The additional 5,500 new homes are anticipated to be delivered beyond 2036 on a number of the larger urban extensions and strategic sites. Due to the scale of these sites and infrastructure requirements it is anticipated that delivery will take place towards the end of the plan period and consequently continue post 2036 (largely at Skerningham and Greater Faverdale). Concerns raised are noted, however these sites have been allocated as a whole to ensure that they are	No change recommended.

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									planned for as a single cohesive sustainable development, fully supported by necessary infrastructure provision and delivered in a coordinated and phased manner. This approach will help to prevent fragmented development in the long term.	
Gillian Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 604	6.2.2	Paragraph	Object	Objection to the plan identifying land to accommodate 16,000 new dwellings which is double the housing requirement of 8,440.	Concerns noted. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. This provides a level of flexibility in the plan if some sites weren't to come forward for development. 5,500 new homes are anticipated to be delivered beyond 2036 on a number of the larger urban extensions and strategic sites. Due to the scale of these sites and infrastructure requirements it is anticipated that delivery will take place towards the end of the plan period and consequently continue post 2036 (largely at Skerningham and Greater Faverdale). Concerns raised are noted, however these sites have been allocated as a whole to ensure that they are planned for as a single cohesive sustainable development, fully supported by necessary infrastructure provision and delivered in a coordinated and phased manner. This approach will help to prevent fragmented development in the long term.	No change recommended.
Mr David Clark				DBDLP 57	6.2.3	Paragraph	Object	Windfall and brownfield sites should be included in the plan rather than first considering and allocating sites in the countryside.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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Mr Ralph Bradley				DBDLP130	6.2.3	Paragraph	Object	Questioned why no assessment has been made for Windfall and Brownfield development.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP208	6.2.3	Paragraph	Neutral	Windfall and brownfield regeneration sites provision should be included and used first for housing before green areas.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP365	6.2.3	Paragraph	Object	Objection to there being no provision for windfall and brownfield regeneration sites. Council are not following Government guidelines in terms of prioritising the redevelopment of brownfield land.	Please see officer response on brownfield sites, urban sprawl and empty homes. Chapter 11 of the National Planning Policy Framework (2019) promotes the effective use of land and making as much use as possible of previously developed or brownfield land to meet objectively assessed needs. As outlined in the officer response above, brownfield sites have been allocated where possible and the Council is supportive of development on brownfield land. However, where there are doubts that a site will come forward over the plan period it can not be included or relied upon in the plan to meet housing needs.	No change recommended.
Mrs Lisa Bramfitt				DBDLP537	6.2.3	Paragraph	Object	Objection to the omission of windfall and brownfield sites and the focus on greenfield areas.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP605	6.2.3	Paragraph	Object	Objects to no provision being made for windfall and brownfield sites. Durham County Council's Preferred Options Plan includes a contribution from small sites in its calculations for housing supply.	Please see officer response on brownfield sites, urban sprawl and empty homes. A contribution from small sites has not been included in the housing land supply in order to create additional flexibility.	No change recommended.
Mr Neil Minto				DBDLP799	6.2.3	Paragraph	Object	Windfall and brownfield sites should be included. Prioritise these sites and protect greenbelts outside the town.	Please see officer response on brownfield sites, urban sprawl and empty homes. Darlington does not have any designated green belt. This is a formal designation typically	No change recommended.

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									found in larger urban areas to prevent settlements merging.	
Mr Anthony Scarre				DBDLP 34	6.2.4	Paragraph	Neutral	The plan should look to replace poorer quality Victorian housing in certain areas such as North Road.	The housing stock in the borough is considered to be of relatively good quality and the Council does not have any housing regeneration programmes at this time. Demolition and replacement also requires relocation of existing residents and is limited in terms of meeting future quantitative housing needs.	No change recommended.
Mrs Lisa Bramfitt				DBDLP 539	6.2.4	Paragraph	Neutral	There are a number of buildings along North Road and above commercial properties in the town centre that could/should be encouraged to be redeveloped.	The Council would be supportive of such schemes and there are permitted development rights which allow for conversions to housing without full planning permission. These buildings alone would not however meet the quantitative and qualitative housing needs of the borough over the plan period.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 209	6.2.5	Paragraph	Object	Disagreement with the use of a figure of 422 dwellings per year, which it considers excessive. Completion rates for 2016/2017 was 163 dwellings which mirrors the figure the DCLG Standard Methodology calculation brings, which is 177 houses per year.	Please see officer response on housing requirement and standard method. Low housing delivery was recorded for 2016/17 with 163 net additional dwellings completed. This did increase in the following years to 485 net additional dwellings in 2017/18 and 627 net additional dwellings in 2018/19. Darlington has also experienced higher rates of delivery in the past, prior to the economic downturn. The completions recorded for 2016/17 is not a justification to reduce the housing target.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 366	6.2.5	Paragraph	Object	Disagreement with the use of a figure of 422 dwellings per year. Completion rates for 2016/2017 was 163 dwellings which mirrors the figure the DCLG Standard Methodology calculation brings, which is 177 houses per year. House and rental values in the town have remained largely static over a 10 year period therefore it would appear that supply is meeting demand.	Please see officer response on housing requirement and standard method. Low housing delivery was recorded for 2016/17 with 163 net additional dwellings completed. This did increase in the following years to 485 net additional dwellings in 2017/18 and 627 net additional dwellings in 2018/19. Darlington has also experienced higher rates of delivery in the past, prior to the economic downturn. The completions recorded for 2016/17 is not a justification to reduce the housing target.	No change recommended.

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Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP606	6.2.5	Paragraph	Object	Disagreement with the use of a figure of 422 dwellings per year, which it considers excessive. Completion rates for 2016/2017 was 163 dwellings which mirrors the figure the DCLG Standard Methodology calculation, which is 177 houses per year.	Please see officer response on housing requirement and standard method. Low housing delivery was recorded for 2016/17 with 163 net additional dwellings completed. This did increase in the following years to 485 net additional dwellings in 2017/18 and 627 net additional dwellings in 2018/19. Darlington has also experienced higher rates of delivery in the past, prior to the economic downturn. The completions recorded for 2016/17 is not a justification to reduce the housing target.	No change recommended.
Hellens Land		mr Baker		DBDLP792	6.2.5	Paragraph	Support	Support for the adoption of a 20% buffer in its five year housing land supply calculation.	Support noted. The percentage is however to be reduced to 10% in accordance with paragraph 73 of the NPPF (2019). The Council passed the housing delivery test in 2019 with 182% and therefore in line with para 73b and footnote 39 of the NPPF the Council has not experienced significant under delivery over the previous three years. As such a 10% buffer is to be applied.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP607	6.2.6	Paragraph	Object	The Plan states “The Local Plan allocates sites to meet and surpass the housing target of 9,840 dwellings over the plan period.”. In using the word “surpass” it indicates its allocation is excessive.	There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. An additional 5,700 new homes are anticipated to be delivered beyond 2036 on a number of the larger urban extensions and strategic sites. Due to the scale of these sites and infrastructure requirements it is anticipated that delivery will take place towards the end of the plan period and consequently continue post 2036 (largely at Skerningham and Greater Faverdale). These sites have been allocated as a whole to ensure that they are planned for as a single cohesive sustainable development, fully supported by necessary infrastructure provision and delivered in a coordinated and phased manner. This	No change recommended.

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									approach will help to prevent fragmented development in the long term. For the reasons outlined above it is considered that the proposed allocations are not excessive.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 609	6.2.9	Paragraph	Neutral	Provision for a review welcomed but questions raised: • What will be the criteria to trigger it? • Will the existing policies be considered valid, have weight, whilst the review is carried out. • If the trigger point for a review is being approached can the review be carried out before the existing polices lose "weight" so they retain their weight whilst the review is carried out?	The Council will continually monitor delivery and the supply of housing. There is no specific threshold to trigger a review but if under delivery becomes persistent a review will be undertaken. During the time taken to complete a review and prior to it, the weight given to relevant policies for the supply of housing will be dependent on whether a five year supply of housing land can be demonstrated. Other relevant national and Local Plan policies would still apply.	No change recommended.
	Hellens Land	mr Baker		DBDLP 793	6.2.9	Paragraph	Neutral	Support for the additional flexibility that this paragraph introduces. Any review should however not come at the expense of allocated sites and in particular the strategic scale allocations which may require support and time should the investment and economic climate change.	Comments noted. If a review is undertaken the Council would still look positively at allocated sites as they have been considered suitable for residential development in the past.	No change recommended.
Miss Madeleine Sutcliffe				DBDLP 387	6.2.11	Paragraph	Object	A mixture of sites would be preferable and plans for the long-term should form the basis of development. Brownfield sites within town centre already have infrastructure and services. Concerns that the Council is encouraging out of town hubs at West Park and Faverdale, thus detracting from the town centre.	A mixture of housing sites are proposed in the Draft Local Plan in terms of size and location. The Local Plan has to ensure a rolling five year supply of housing sites throughout the plan period up to 2036 to meet the identified housing need. As such there are sites in the plan which are anticipated to come forward in the short and long term.The larger urban extension sites including the strategic sites at Skerningham and Greater Faverdale will come forward later in the plan period due to their size and infrastructure requirements. These sites are to be planned as	No change recommended.

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									cohesive communities which are supported by the infrastructure and services which they require. Please see officer response on brownfield sites, urban sprawl and empty homes. Neighbourhood centres are proposed at Skerningham and Greater Faverdale, providing supporting local community facilities and services to meet the day to day needs of residents. They have the potential to include a health hub, education, employment opportunities and retail facilities which are of a scale and type proportionate to the nature of the development. As outlined above these facilities are intended to serve day to day needs and are not to be of a scale or type of use which would detract from the town centre. This is also the case with regards to retail uses which have been developed in the West Park area. The western part of the borough has lacked convenience retail in the past and these developments meet day to day needs. A town centre first approach is also advocated in policy TC 1 for all main town centre uses and the Council is exploring other ways to encourage and promote the growth of the town centre.	
Stephen Bibby				DBDLP 479	6.2.11	Paragraph	Object	The strategic site proposed in the north east will not contribute much to the town as a whole. Shops and services would draw away from the town centre (as they do at West Park and Yarm Road). Brownfield sites in the main urban area should be developed first.	The Skerningham Strategic Allocation assists in meeting the quantitative and qualitative housing needs of the borough. The site is to be planned as a cohesive community which is supported by the required infrastructure and services. Please see officer response on Skerningham Strategic Allocation. A neighbourhood centre is proposed at Skerningham, providing supporting local community facilities and services to meet the day to day needs of residents. This has the potential to include a health hub, education,	No change recommended.

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									employment opportunities and retail facilities which are of a scale and type proportionate to the nature of the development. As outlined above these facilities are intended to serve day to day needs and are not to be of a scale or type of use which would detract from the town centre. A town centre first approach is advocated in policy TC 1 for all main town centre uses and the Council is exploring other ways to encourage and promote the growth of the town centre. Please see officer response on brownfield sites, urban sprawl and empty homes.	
Barratt Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1374	Table 6.2	Spatial distribution of housing allocations	Object	Supportive of settlement hierarchy however it is considered that some development will be required within the smaller villages to ensure future sustainability and vitality throughout the plan period. The plan should therefore take a flexible approach with regard to the delivery of housing within rural areas.	The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. It is considered that these are the most sustainable areas for new housing development. The policies within the plan will allow some residential development in the smaller villages, for example infill development, rural exception sites and dwellings related to the rural economy.	No change recommended.
	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP 1373	Table 6.2	Spatial distribution of housing allocations	Support	Supportive of identified settlement hierarchy and distribution of housing allocations.	Support noted.	No change recommended.
Mr Christopher Noble				DBDLP 5	6.2.12	Paragraph	Support	We agree that the percentage of new housing in the Service Villages within the Darlington area should not exceed 10% of the total.	Support noted.	No change recommended.
Mr Peter Hughes				DBDLP 50	6.2.12	Paragraph	Support	Allocation to service villages appears sufficient to village needs.	Support noted.	No change recommended.

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Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP378	6.2.12	Paragraph	Support	Welcome the fact that no housing allocation is proposed for Neasham Parish. However, greater support for the sustainability of rural communities is required and this will be commented on later in this response.	Support and comments noted. Para 83 of the NPPF 2019 does outline that planning policy and decisions should support a prosperous rural economy and this includes enabling the retention and development of local services and community facilities. These principles are reflected in policy IN 10 (Supporting the Delivery of Community and Social Infrastructure) of the Draft Local Plan.	No change recommended.
Dr Ian Bagshaw				DBDLP309	6.2.12	Paragraph	Support	Proposed level of 10% for service villages is right.	Support noted.	No change recommended.
Mr Stewart [illegible]th				DBDLP396	6.2.12	Paragraph	Support	Proposed 10.4% of housing allocated to service villages is sufficient. Any increase would place intolerable burden on villages' infrastructure.	Support and comments noted.	No change recommended.
Mr Anthony Scarre				DBDLP36	Policy H 2	Housing Allocations	Neutral	Questioned if there is a preference order for the development of sites. Questioned if some sites are more appropriate than others such as brownfield sites?	There is not a preference order as such for the development of sites proposed for allocation. An estimate has been made of when sites are expected to be delivered which is outlined in Appendix A Housing Trajectory. Site information and standard assumptions have been utilised to form the trajectory. The assumptions include factors such as standard timescales for obtaining planning permission and average build rates. The trajectory does not place any phasing restrictions on the sites and they may come forward sooner than indicated. Please also see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Alan Hutchinson	Whinfield Residents Association			DBDLP165	Policy H 2	Housing Allocations	Object	Skerningham Strategic Allocation is expected to yield 1800 homes during the plan period, but if at least 2000 fewer are needed across the Town because of inaccurate figures this would	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the Skerningham strategic site is required to meet these needs.	No change recommended.

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								mean that the Skerningham Strategic Allocation is not required. WRA, therefore, urges that the Skerningham Strategic Allocation be removed completely from the Draft Local Plan and that the need for its future inclusion can be reviewed at the time of the production of the next Local Plan in 2036.		
Charles Johnson	Conservative Group			DBDLP 120	Policy H 2	Housing Allocations	Neutral	An annual update of the tables 6.3 and 6.4 must be presented to council.	The request can be undertaken separate to the Local Plan. Housing monitoring will be undertaken to assess whether delivery is meeting the housing requirement and target of policy H 1. A housing position statement will also be produced at the beginning of each financial year to set out the current five year housing land supply. This involves an update to the housing trajectory (Appendix A of the Draft Local Plan) which is a combination of tables 6.3 and 6.4 outlining expected delivery rates.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 210	Policy H 2	Housing Allocations	Object	Housing requirement / target figure disputed and therefore objection to the housing allocations. Questions raised: • How does highway transport modelling justify the new infrastructure and location of new dwellings. • Should productive agricultural land be used for road building and housing development. • If the Government's standard method was used then the Council would have a 5 year housing land supply without Skerningham and using agricultural land.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Please see officer response on brownfield sites, urban sprawl and empty homes. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal.	No change recommended.

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Anne Rudkin				DBDLP256	Policy H 2	Housing Allocations	Object	Housing requirement is overstated therefore Skerningham allocation is not required. Objection to the use of green space above 'brownfield' sites for development. This does not accord with the National Planning Policy Framework.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the Skerningham strategic site is required to meet these needs. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr John Rudkin				DBDLP291	Policy H 2	Housing Allocations	Object	Housing requirement is overstated therefore Skerningham allocation is not required. Objection to the use of green space above 'brownfield' sites for development. This does not accord with the National Planning Policy Framework.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the Skerningham strategic site is required to meet these needs. Please see officer response on Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP367	Policy H 2	Housing Allocations	Object	Housing requirement / target disputed and consequently object to the housing allocations particularly the urban extensions. Concerns raised: • Use of agricultural land for development. • If the Government's standard method was used DBC would have a 5 year housing land supply without the need to use agricultural land.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mrs Lisa Bramfitt				DBDLP541	Policy H 2	Housing Allocations	Object	Given the uncertainty surrounding Brexit and the expected increase in demand for 'home grown' resources agricultural land should not be reduced and brownfield sites developed first.	Please see officer response on housing requirement and standard method and response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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Patricia Newton				DBDLP501	Policy H 2	Housing Allocations	Object	DBC should stop this type of development and build on brownfield sites.	Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mrs C Everington				DBDLP545	Policy H 2	Housing Allocations	Object	Concerns regarding urban extensions and the impact on the town centre. Very little in the way of planning for brownfield sites which would bring benefits to the town centre. Building on greenfield sites is subject to being kept affordable for local people and supported by recent evidence of unmet housing need. Questioned whether this criteria is met.	Please see officer response on brownfield sites, urban sprawl and empty homes. Greenfield sites do not have to be developed purely for affordable housing, however the Draft Local Plan does have an affordable housing policy (H 5) which seeks a proportion of affordable housing from market led schemes. The sites proposed for allocation will meet the assessed housing needs of the borough over the plan period. Town centres around the country are facing a number of challenges. The nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use. Growth around the town will generate increased expenditure in the town centre and will help to support local employment and the vitality and viability of the centre. A town centre first approach is also outlined in policy TC 1 of the Draft Local Plan and the Council are exploring ways in which to support the growth of the town centre.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP613	Policy H 2	Housing Allocations	Object	Objection to the housing requirement / target and consequently the housing allocations. Objection to the use of productive agricultural land for large scale housing developments. If the Government's Standard Methodology was used then the Council would have a 5 year housing land supply without utilising productive agricultural land. The status of some of the housing sites in Policy H2 (allocations), table 6.4 (commitments) and the policies map should be checked. The status of sites	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs. Please see officer response on brownfield sites, urban sprawl and empty homes. This provides information on site selection. Further detail can be found in the Housing and Employment Land Availability Assessment and Sustainability Appraisal which are available on the Council's consultation portal. The value of agricultural	No change recommended.

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								with permissions subject to Section 106 agreements should be classed as commitments as it would be difficult for the Council to reverse its decision to grant permission.	land has been considered via these assessments. The status of the housing allocations and commitments will be checked prior to the next stage of plan preparation. Sites which have been minded to approve subject to a section 106 agreement are not classed as commitments as the decision notice has not yet been issued by the Council. The decision will be issued once the legal agreement has been signed. A condition is also currently placed on a minded to approve decision that the s106 agreement must be signed within a certain period otherwise a refusal will be issued (unless an extension of this time period can be agreed with the Council) . If this does occur and a refusal issued, the Council will not necessarily renew a permission as circumstances can change.	
Mrs Laura Roberts	Northumbrian Water			DBDLP 736	Policy H 2	Housing Allocations	Support	Broadly support the proposed spatial strategy set out in the draft local plan. As the statutory water and sewerage undertaker it is our duty to ensure that appropriate infrastructure is in place to serve these communities. NWL has a large capital investment programme for the whole of the north east region which operates in 5 yearly cycles known as Asset Management Plan periods (AMPs). The next AMP period is from 2020 to 2025 and is now finalised, but our investment process does allow for some flexibility to enable network reinforcement which may be required to facilitate new development. We can confirm that we have received pre-development enquiries for the majority of the allocated sites, and although this has highlighted that there are some network capacity issues in some specific areas of the borough, we will work with the Local Authority and Developers to ensure that any necessary reinforcement to our network is programmed in to support the delivery of the plan. With	Support and comments noted.	No change recommended.

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								regards to treatment capacity, the majority of Darlington's Borough drains to Stressholme sewage treatment works, which currently has sufficient capacity to accommodate all of the proposed development. Some of the sites allocated have been identified to have strategic assets crossing the boundary, such as South Coniscliffe Park. We have recently contacted the Council and agreed to conduct a high level assessment of allocated sites, to assess if there are any assets on site. This will enable the council to strengthen their evidence base and will allow for Northumbrian Water, the Local Authority and the developer(s) to hold discussions from the earliest design stages to ensure any necessary diversion, relocation or protection measures required prior to the commencement of the development are suitably considered and integrated.		
Hellens Land		mr Baker		DBDLP 794	Policy H 2	Housing Allocations	Support	Hellens Land fully supports the allocation of Greater Faverdale in Policy H2 of the Local Plan. It is the most sustainable and deliverable location for new housing and employment. The 2012 NPPF at paragraph 52 states that *"the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns […]"* . The Greater Faverdale allocation provides an effective way of ensuring long term housing supply and the strategic benefits of delivering a comprehensively planned mixed use site.	Support noted.	No change recommended.

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								Policy H2 states that Greater Faverdale has an indicative yield of 810 by 2036. We welcome the term indicative in the policy as it should be recognised the site may come forward sooner and it would be unsound to place artificial restrictions on the ability of the site to deliver homes.		
Mr Alan Hutchinson				DBDLP 751	Policy H 2	Housing Allocations	Object	Housing requirement / target disputed therefore the Skerningham strategic allocation is not required and should be removed from the plan. National guidelines say that development in the countryside should be a last resort, DBC are contradicting this.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs including the Skerningham strategic allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Joanne Harding	Home Builders Federation			DBDLP 796	Policy H 2	Housing Allocations	Neutral	It is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data. It is important that the plan should seek not only to provide sufficient development opportunities to meet the housing requirement but also to provide a buffer over and above this requirement. The reasons for the	Comments noted. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to developer interest and physical site constraints. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. It is considered that the proposed allocations do follow a logical hierarchy, provide an appropriate development pattern and support sustainable development. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for	No change recommended.

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								inclusion of such a buffer are two-fold. Firstly, the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors' decisions following local plan examination. Therefore, if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, to provide flexibility. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. The HBF recommend a 20% buffer of sites be included within the plan.	development.There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. Contributions from small sites, windfall sites and brownfield regeneration sites within the main urban area have also not been included in the supply and create additional flexibility.	
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 837	Policy H 2	Housing Allocations	Object	Support the identification of Skerningham as a defined allocation within the Local Plan. Skerningham Estates Ltd would seek to identify an increased site yield at Skerningham by 2036.	The housing trajectory is indicative and as outlined in the Draft Local Plan it does not place any phasing restrictions on sites and they may come forward sooner than indicated.	No change recommended.
Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP 870	Policy H 2	Housing Allocations	Object	Additional site put forward for allocation at School Aycliffe. Site plan and supporting material available on Council's consultation portal linked to policy H 2 ref DBDLP870. The site is suitable for residential development and a logical extension to the western edge of the village. Development can be sensitive to the character and needs of the surrounding area. Site yield of 120 units which could be delivered in the short term.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. The proposed site does not accord with the locational strategy outlined above. School Aycliffe has very limited services and facilities and it is considered there are more sustainable	No change recommended

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									locations for housing development across the borough. As such the site is not proposed for allocation.	
Mr Roger Fitzpatrick-Odahamier				DBDLP982	Policy H 2	Housing Allocations	Object	Housing requirement / target disputed therefore the Skerningham strategic allocation is not required and should be removed from the plan. Objection to the use of greenfield sites over brownfield for development. This goes against the National Planning Policy Framework.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs including the Skerningham strategic allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP855	Policy H 2	Housing Allocations	Object	Objection that the policy does not include any housing allocations within, or on the edge of rural villages. The current approach is not consistent with national planning policy which does not support blanket policies restricting housing development in some settlements and preventing other settlements from expanding. The policy should be reworded to provide means of housing coming forward in rural villages. NWL's land interest at Sadberge Reservoir (HELAA site ref 98) is a suitable and sustainable location for new housing and it should be allocated within the Local Plan for residential development (site location plan available on the Council's consultation portal - comment linked to policy H 2 ref DBDLP855). Previously developed site with a indicative yield of 46 dwellings. The site would support services within the village and nearby Middleton St George in line with para 78 of the NPPF. Infrequent bus service adjacent to the site. Would result in the development of a vacant brownfield site	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. As such there are no proposed housing allocations at the rural villages. This approach does not result in a blanket restriction to residential development in rural areas as other policies within the plan will allow infill development, rural exception sites and dwellings for rural workers; the plan should be read as a whole.	No change recommended.

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								which has had issues with anti social behaviour, tress passing and health and safety. Technical assessments have been prepared which demonstrate that the site is suitable for housing development.		
Mr Brian Jones	Sadberge and Middleton St George Councillor			DBDLP 971	Policy H 2	Housing Allocations	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	No change recommended.
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP 948	Policy H 2	Housing Allocations	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new	No change recommended.

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								New housing estates should have attractive tree planting and highways which reduce speeds.	homes including specialised housing suitable for older people and affordable housing. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	
Steve York	Sadberge and Middleton St George Councillor			DBDLP985	Policy H 2	Housing Allocations	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This	No change recommended.

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									document sets out approaches and methods to reduce vehicle speeds.	
Mr Mike Allum	Durham County Council			DBDLP 1050	Policy H 2	Housing Allocations	Neutral	Durham County Council note the focus of the Draft Plan on two strategic allocation policies, Policy H10 and Policy H11. As well as these policies, we note Policy H2 explains the housing allocations by Urban Extensions, Urban Area and Villages with a number of Urban Extensions planned. We welcome further discussions, as necessary, on the implications of major developments on the highways network in County Durham.	Comments noted. Further discussions will be undertaken between the authorities and duty to cooperate statements prepared with regards to both housing and the highway network.	No change recommended.
Mr Derek Dodwell	Darlington Association of Parish Councils			DBDLP 1065	Policy H 2	Housing Allocations	Object	Objection to the amount of housing allocations in the service villages, particularly given the recent increase in house building and the impact on environmental matters and transport infrastructure. Services and facilities are in decline in the service villages and an analysis of current capacity should be undertaken involving Parish Council's	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. The sites at the service villages also assist with delivery in the first five years of the plan as the larger urban extensions and strategic sites will take longer to commence due to the size of these sites and the infrastructure requirements. The environmental impacts of the sites have been considered via the Sustainability Appraisal associated with the plan. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. A survey of facilities and services	No change recommended.

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									within the borough's villages is also to be carried out as part of the evidence base work. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	
Mr John Fleming	Gladman Developments			DBDLP 1082	Policy H 2	Housing Allocations	Neutral	In principle, Gladman is supportive of the approach the Council has taken in identifying suitable and sustainable housing sites such as land at Staindrop Road and Land at Grendon Gardens to meet the housing needs of the borough. Should planning applications come forward on the proposed allocations prior to the submission of the Local Plan the Council should take a positive approach in considering these applications and approve sites which are in accordance with the emerging Local Plan. This will also provide certainty at the Local Plan examination. Noted that site yield in table 6.3 is indicative and final number of homes will be determined by a planning application. This could result in the housing land supply being lower. Recommended that the Council implement a 20% buffer above OAN to the housing allocations should the Council's commitments not come forward as anticipated.	Support and comments noted. Prior to submission of the Local Plan the Council is taking a positive approach to sites which are proposed allocations and are subject to planning applications. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	No change recommended.
Paul Hunt	Persimmon Homes			DBDLP 1383	Policy H 2	Housing Allocations	Object	Objection to the land known as 'Berrymede Farm Phase 2' (HELAA Site Reference 049) being omitted from the Darlington Draft Local Plan as an allocated site. (Site location plan available on consultation portal linked the Appendix A ref DBDLP1383). The site could contribute towards a 20% buffer of sites but it is considered	Although Berrymead Farm Phase 2 (site ref 49) was assessed as suitable, available and achievable in the HELAA, this is a high level assessment of sites and not the final decision on whether a site will be proposed for allocation. It is considered that there are more suitable sites proposed for allocation within the plan and there is sufficient flexibility of sites. Taking into account the completions recorded for the first	No change recommended.

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								the site should be allocated on it's own merits. The site is considered by the promoter to be suitable, available and achievable in line with the outcomes of the Council's HELAA (2017). The site would also assist in facilitating a road link between the A167 and Faverdale. This is not set out in the Draft Local Plan but is a longer term aspiration of the Council. This would be a continuation of the Skerningham distributor road. Work is also being undertaken on site access which would align with the access to the Skerningham site.	three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. It is acknowledged that site 49 would be a logical extension to site 3 (South of Burtree Lane) and site 8 (Berrymead Farm), however it is not required for this plan period and more suitable sites are available in closer proximity to the main urban area. The site can be considered again during future Local Plan reviews. The potential of the site providing a road link is noted, however this is not required for the delivery of the Draft Local Plan.	
Paul Hunt	Persimmon Homes			DBDLP 1184	Policy H 2	Housing Allocations	Neutral	The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data. Persimmon Homes recommend a 20% buffer of sites be included within the plan. The NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. Therefore housing requirements should be viewed as a minimum requirement and additional sites are required to enable the plan requirements to be surpassed. This is supported by inspectors decisions.	Comments noted. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable/developable. Consideration has been given to developer interest and physical site constraints. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. Where additional information is available from developers on site capacity this has been utilised for indicative yields. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This	No change recommended.

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									provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP1127	Policy H 2	Housing Allocations	Support	Darlington Farmers Auction Mart Company Ltd (DFAM) supports Policy H2 – Housing Allocation, Site ref. 243 – Snipe Lane, Hurworth Moor. DFAM have further land to the south of the A66 which would also be suitable for development (plan available on consultation portal attached to comment ID DBDLP1371 linked to site 243).	Support for site 243 noted. With regards to the alternative sites proposed, it is considered that there are more suitable sites proposed for allocation within the plan. The alternative sites proposed are located to the south of the A66 which is the logical boundary to the main urban area of the Darlington. Housing development in this location would be disconnected and isolated from the main urban area. This would raise issues with the sustainability of the site. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. Alternative sites proposed can be considered again during future Local Plan reviews.	No change recommended.

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N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1114	Policy H 2	Housing Allocations	Object	WYG notes that the Council has not yet published a Whole Plan Viability Assessment to accompany the Local Plan. Consequently, it is not currently possible to determine the deliverability of these sites. Our Client therefore believes this approach is unsound as the allocations are unjustified. To ensure the policy is sound, the Council needs to prove that the allocations are viable (with the relevant policy requirements). The plan should seek to provide development opportunities to meet the housing requirement, but also provide a buffer over and above this requirement. The housing requirements set within the plan should be viewed as a minimum requirement. Therefore, if the plan is to achieve its housing requirement as a minimum, additional sites are required to enable the plan requirements to be surpassed. Second, this will also allow a degree of flexibility. A 20% buffer of sites recommended. Our clients landholdings (at Humbleton Farm) can provide a future development option in the shape of a new settlement/Garden Village.	A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. This evidence will be available at the next stage of plan preparation. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. With regards to the landholdings which could provide a future development option at Humbleton Farm, it is considered that this is not a sustainable location for housing development and would not accord with the locational strategy of the Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will be able to provide) the level of services, facilities and employment opportunities that are required to support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development.	No change recommended.
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1166	Policy H 2	Housing Allocations	Support	Bellway are fully supportive of site reference no. 392 ‘Elm Tree Farm’ included within Policy H2 and confirm it is deliverable within the plan period. Currently preparing a planning application for the site. Whilst the site is not located on ‘brownfield land’, it is considered to be a sited in a highly sustainable location which has the	Support and comments noted.	No change recommended.

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								potential to accommodate a good mix of housing to assist meeting housing need over the plan period including a significant number of affordable housing units. Bellway support the approach that the yield shall be determined via the planning process and the yield within the plan should not be considered an upper limit.		
M C Ralstrick		Mr Joe Ridgeon		DBDLP1245	Policy H 2	Housing Allocations	Object	We strongly object to the non-inclusion of the Land at Heighcroft House, Heighington as a proposed housing allocation in Policy H2. We consider that the Land at Heighcroft House, Heighington is a preferable site to the proposed allocation of "Site 95 – Beech Crescent East, Heighington" as that site will have a greater impact on setting of the adjacent Grade II Listed Trafalgar House. The site is in a sustainable location and no physical constraints identified. Site plan available on the consultation portal linked to overall Draft Local Plan consultation point - ID DBDLP1237. Site proposed for market housing with an indicative yield of 38 dwellings (25dph).	With regards to the alternative site at Heighcroft House, it is considered that there are more suitable sites proposed for allocation within the plan. Site 95 Beech Crescent East, Heighington is more preferable as it is a logical extension to site 34 Beech Crescent West, Heighington which has planning permission, is under construction and is expected to deliver new homes early in the plan period. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development.There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. Alternative sites proposed can be considered again during future Local Plan reviews.	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP1301	Policy H 2	Housing Allocations	Object	We consider a suitable additional allocation to address many of the concerns in these representations is land north of Neasham Road, Hurworth (HELAA Site 83). The evidence submitted alongside these representations demonstrates the suitability and deliverability of the site,	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website).	No change recommended.

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								and its capacity to accommodate a range of house types and sizes which will make a significant positive contribution to the overall objectives of the plan. All supporting documents available on the Council's consultation portal, linked to policy H 2, ID DBDLP1301. The proposed site has been assessed as suitable for housing development in the Council's latest Housing and Employment Land Availability Assessment. There is also limited opportunities for development in Hurworth over the plan period. Site 333 benefits from a detailed planning permission and is expected to be delivered in the short term. A plan wide viability assessment must be undertaken as soon as possible and we reserve over position to comment further on this as necessary.	Although the site proposed (ref 83 North of Neasham Road, Hurworth) was assessed as suitable, available and achievable in the HELAA, this is a high level assessment and further analysis of sites was undertaken via the SA. At this stage it was considered that the site would significantly affect the Hurworth Conservation Area and Grade II listed Strawberry Cottage. It was also considered that development of the site would impact upon the river setting of this part of the village. As such is was considered that there were other more suitable sites which could be proposed for allocation. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. This will be available at the next stage of plan preparation.	
Mr Derek Dodwell	Darlington Association of Parish Councils			DBDLP1372	Policy H 2	Housing Allocations	Object	Concerns regarding the allocation of sites in the service villages. Considered to be too burdensome and assessment of infrastructure capacity required. Suggested to increase allocations within the urban area and town centre fringe to reduce pressure on service villages.	Please see officer response on brownfield sites, urban sprawl and empty homes. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. In addition to this the Council has to maintain a five year supply of deliverable housing sites. It takes more time for the larger strategic urban extensions to start delivering new homes due to the size of the developments and the infrastructure requirements. The service villages already have a number of facilities/services and good transport links, therefore they are considered sustainable locations for housing development. The sites at the service villages importantly help to contribute to the five year	No change recommended.

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									supply of sites and are anticipated to deliver new homes within the first five years of the plan period.	
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1232	Policy H 2	Housing Allocations	Object	Taylor Wimpey do not consider that the Council has allocated sufficient housing land to meet the proposed housing target and to ensure that there is sufficient flexibility. Current flexibility in the plan is only 10% above the housing target figure. Advised that the buffer should be increased to 20%. In light of historic delivery issues and the reliance within the plan on two large strategic sites (Skerningham and Greater Faverdale) with ambitious lead-in times and delivery rates, Taylor Wimpey do not consider this level of contingency to be enough. Additional sites should be allocated including Land South of Coniscliffe Road. Due to historic delivery issues and given the lack of flexibility, the plan should include potential triggers for a full plan review if the plan fails to deliver against the housing requirement for a specific period of time.	There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. Para 6.2.9 does set out if monitoring indicates that there is persistent and prolonged under delivery of housing, a review of the housing chapter and housing allocations will be undertaken in order to resolve the situation. Consideration will be given to a specific trigger.	No change recommended.
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1239	Policy H 2	Housing Allocations	Object	Taylor Wimpey are disappointed that land South of Consicliffe Road has not been included in the draft allocations (HELAA site 85). The site is deliverable and a suitable location for housing development. The Council has recently granted permission for 37 dwellings on land to the east of Gate Lane, Low Coniscliffe (ref 16/01231/FUL) thereby accepting that Low Coniscliffe is a suitable location for housing development.	Allocating sites for housing in the rural villages does not accord with the locational strategy of the Draft Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will be able to provide) the level of services, facilities and employment opportunities that are required to support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development. Subsequently the site referenced is not proposed for allocation.	No change recommended.

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								Full details of supporting information submitted can be viewed on the consultation portal linked to policy H 2, ref DBDLP1239.	The housing permission referenced was determined at a time when the Council could not demonstrate a five year supply of deliverable housing sites. As such the tilted balanced of para 11 of the NPPF (2019) applied. Although the site did not accord with the locational strategy of the existing policies of the development plan or emerging Local Plan, the Council considered that the adverse impacts of the scheme did not significantly and demonstrably outweigh the benefits. As such permission was granted in line with national policy.	
	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP1157	Policy H 2	Housing Allocations	Support	Support for allocation of clients land Site 100 Hall Farm, Branksome. The Site represents a sustainable and logical urban extension to the existing settlement. The Site is deliverable and will significantly contribute to Darlington's identified housing need.	Support noted.	No change recommended.
Mr Mark Walton		Mr Ian Lyle		DBDLP1219	Policy H 2	Housing Allocations	Object	Re-balancing of the proposed spatial distribution of housing sought to increase proportion at service villages, particularly Hurworth. Allocating the land proposed by our client to the West of Roundhill Rd, Hurworth would help to achieve this objective (site map available on the Council's consultation portal - view full comment linked to policy H 2). As part of this re-balancing, objection to the proposed strategic urban extensions in policy H 2 (Greater Faverdale and Skerningham). Reliance on such large scale strategic extensions is not robust because of significant delays that can occur in bringing such sites forward and their associated infrastructure. Noted that only a proportion of these sites contribute to housing land supply within the plan period but even these	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to developer interest and site physical constraints. This is reflected in the housing trajectory and the estimated timescales for delivery. Delivery rates in the housing trajectory are considered to be reasonable and not overly optimistic. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are	No change recommended.

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								assumptions are too optimistic and the plan is therefore unsound. Advised to delete Skerningham and Greater Faverdale from H2 or reduce the supply from these sites within the plan period to more realistic levels. Shortfall from this can be addressed via our client's site, windfalls and other smaller scale urban extensions, including elements of the Skerningham site which are adjacent to the existing built up area. Proposed site could deliver 300+ dwellings. It is broadly flat and currently in use as farmland, within floodzone 1 and with no known biodiversity interest. The site would help to meet housing need and support the long term vitality and viability of the shops, services and facilities at Hurworth.	deliverable when taking into account planning obligations which are set out in the plan. Paragraph 72 of the NPPF (2019) supports the Council's approach in allocating large urban extensions as it states, "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." Allocating the site as a whole rather than a number of small individual allocations, ensures that the area is planned as a single cohesive sustainable development fully supported by the necessary infrastructure. With regards to the alternative site proposed, it is considered that there are more suitable sites proposed for allocation within the plan and there is sufficient flexibility of sites. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. The alternative site proposed can be considered again during future Local Plan reviews.	
	Godolphin Developments Ltd	Ms Jennifer Nye	Lichfields	DBDLP 1265	Policy H 2	Housing Allocations	Object	Policy H 2 does not include any housing allocations in any Rural Villages or sustainable areas not identified as a Rural Village. This approach is not consistent with national planning policy which does not support	Allocating sites for housing in the rural villages does not accord with the locational strategy of the Draft Local Plan. Housing allocations are focused on the main urban area and service villages as these areas provide (or will be able to provide) the level of services, facilities and	No change recommended.

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								blanket policies restricting housing development in some settlements and preventing other settlements from expanding. The policy should be reworded to provide means of housing coming forward in Rural Villages. Godolphin Developments Ltd's land interest at Great Stainton is a suitable and sustainable location for new housing and we consider it should be allocated within the Local Plan for residential development. Site proposed for approximately 10-15 dwellings with potential for live-work units, shop, community facility such as a play area. See consultation portal for site plan and supporting documents linked to policy H 2, ID DBDLP1265. In this context the use of development limits to prevent any development around Rural Villages in Darlington and a hierarchy which does not positively support housing development in smaller locations not identified as a Rural Village is not considered to be justified. Important that local rural housing needs are met. We therefore consider that this policy of defining development limits to be unsound.	employment opportunities that are required to support communities and an increase in population. It is considered that these areas are the most sustainable locations for new development. Some housing development will be permitted in rural areas, such as rural exception sites, infill development and housing required to support the rural economy, providing they accord with all relevant national and Local Plan policies. The site proposed was considered not suitable for housing development in the HELAA for the reasons outlined above.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1335	Policy H 2	Housing Allocations	Object	Support for allocation of our Client's land interests at Great Burdon (identified as Site 20) and Elm Tree Farm (identified as Site 392). These sites represent sustainable and logical urban extensions to the existing settlement. The sites are deliverable and will significantly contribute to Darlington's identified housing need. With regard to our Client's land interests at Burtree Lane (HELAA site reference 109), it is noted that this is not included as a draft allocation. The	Support for site 20 and 392 noted. With regards to site 109 (East of Whesseo House) although the site was assessed as suitable, available and achievable in the HELAA, this is a high level assessment of sites and not the final decision on whether a site will be proposed for allocation. It is considered that there are more suitable sites proposed for allocation within the plan and there is sufficient flexibility of sites; a 16% buffer above the remaining housing target figure. It is acknowledged that site 109 would be logical extension to site 3 (South of Burtree Lane) and	No change recommended.

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								HELAA identified that the site is suitable, available and achievable for residential development and noted no major constraints which would preclude development from coming forward. The Council's evidence base does not provide any justification for the exclusion of this site as an identified housing allocation and the decision to exclude this site is therefore not consistent or justified. The site is considered to be available, suitable, achievable, deliverable and viable for residential development and would help contribute to the Council's housing target. As a result, our Client objects to Policy H 2 on the basis that it is not effective, justified or consistent with national policy. The site (ref 109) is also a logical extension to two sites with have been minded to approve and are acknowledged in the Local Plan - site 3 South of Burtree Lane and site 8 Berrymead Farm.	site 8 (Berrymead Farm), however it is not required for this plan period and more suitable sites are available in closer proximity to the main urban area. The site can be considered again during future Local Plan reviews.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1365	Policy H 2	Housing Allocations	Object	The Consultation Draft Plan does not allocate our Client's land interests at Burtree Lane for development (HELAA site ref 109). It is considered that in order to ensure that the Council's identified housing needs are met, additional land will be required should other sites not come forward. Information and evidence submitted to demonstrate that the site is available, suitable and deliverable for residential development. Site is available and there are no ownership issues with the site. Our client has an option on the land and is committed to development subject to the land obtaining an allocation or	Although site 109 (East of Whesseo House) was assessed as suitable, available and achievable in the HELAA, this is a high level assessment of sites and not the final decision on whether a site will be proposed for allocation. It is considered that there are more suitable sites proposed for allocation within the plan and there is sufficient flexibility of sites; a 16% buffer above the remaining housing target figure. It is acknowledged that site 109 would be logical extension to site 3 (South of Burtree Lane) and site 8 (Berrymead Farm), however it is not required for this plan period and more suitable sites are available in closer proximity to the main urban area. The site can be considered again during future Local Plan reviews.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								planning permission for residential development. A range of desktop assessments have been undertaken which demonstrate that the site is suitable for development and there are no constraints identified that would preclude the development of the land for residential use. The site (ref 109) is also a logical extension to two sites with have been minded to approve and are acknowledged in the Local Plan - site 3 South of Burtree Lane and site 8 Berrymead Farm. Full details of the sites sustainability and suitability can be found on the Council's consultation portal - comment linked to policy H2 ID DBDLP1365. The site should be included with the development limit to ensure that suitable and appropriate sites are not dismissed unnecessarily. The site should be allocated for development or at the minimum be able to come forward as a windfall. The site is considered to be achievable and there is excellent prospect that it can be developed in the short term (0-5years) and is therefore deliverable.		
Mr Peter Hughes				DBDLP49	Table 6.3	Housing Allocations	Support	Agree allocation to Hurworth is suitable and sufficient for village needs.	Support noted.	No change recommended.
Mr Simeon Hope				DBDLP248	Table 6.3	Housing Allocations	Object	Housing target disputed. Contradicts ONS forecast of 177 per annum for Darlington. This means that Skerningham Strategic Allocation is unnecessary.	It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations, including the Skerningham strategic allocation, are required to meet these needs.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Stephen Bibby				DBDLP480	Table 6.3	Housing Allocations	Object	Massively skewed distribution, unnecessarily so. Developers are driving the consultation, rather than the needs of the town.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. Further explanation can be found in officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
S Jobe				DBDLP744	Table 6.3	Housing Allocations	Neutral	It is requested that the development limits of Middleton St George be amended to include Site 90 (HELAA ref) and further considered for housing allocation. This site was assessed and accepted as being suitable, available and achievable for 109 housing units over the next 6 to 10 years in the recent DBC HELAA process. The site is approximately 10 acres. The site size makes it suitable for disposal to a single house builder and quick, simple delivery plan. Single family ownership, avoids complex delivery. Location: Natural continuation of the village. It is a self-contained site within strong boundaries on all sides. Being positioned at the approach to the village, with immediate access to the A67, the impact of a housing development on traffic levels on the center of the village would be relatively minimal. Self-contained agricultural land with no significant constraints.	Although site 90 (West of St Georges Gate, MSG) was assessed as suitable, available and achievable in the HELAA, this is a high level assessment of sites and not the final decision on whether a site will be proposed for allocation. It is considered that there are more suitable sites proposed for allocation within the village which are located more centrally and in closer proximity to services and facilities. There is also sufficient flexibility of sites in the plan; a 16% buffer above the remaining housing target figure. The site can be considered again during future Local Plan reviews.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								Site Features: The land is arable grade 3, no contamination issues. The site is screened by hedgerow/trees on all boundaries. Connections possible to existing roads and established footpaths bordering the site. Generally a flat site. The land is not liable to flooding (flood zone 1), but would require sustainable drainage in development (SUDS), which would be easily achievable given the physical features of the site. Utilities are readily accessible. There are no Rights of Way/Public Foot Paths on site. The site is not in a conservation area or area of archeological interest or significance. Site is capable of providing a significant amount of affordable housing to help meet local needs. Development would help support local village facilities and services.		
S Jobe				DBDLP829	Table 6.3	Housing Allocations	Neutral	Site 90 (HELAA ref) to be included in the development limits of Middleton St George and the overall housing allocation. Comments below are suggested additions to the existing commentary regarding the viability and sustainability of Site 90, in the Sustainability Appraisal (response also linked to SA consultation). • Site is ideally located to connect to PROW and cycle routes. • The development would help support local village facilities and services. • Good access to green infrastructure and national cycle route.	Comments noted, however it is considered that there are more suitable sites proposed for allocation within the village which are located more centrally and in closer proximity to facilities and services. There is also sufficient flexibility of sites in the plan; a 16% buffer above the remaining housing target figure. The site can be considered again during future Local Plan reviews.	No change recommended.

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								• The site will have no detrimental impact on the safety and security of people and property and will have minimal increase in traffic in the centre of the village. • Growth of village will encourage more frequent bus service. • Site is suitable for sustainable drainage (SuDS). • Site would promote access to green infrastructure. Suggested amendment: The development would be a continuation of the existing predominantly linear form of the village. There are no physical constraints to the site and it offers a viable, highly developable and sustainable site. An area of just over 1 acre of mature woodland is part of the site. The woodland screens the beck, provides habitat for wildlife and is a substantial buffer/screen for the site. The beck remains accessible for clearance and maintenance, ensuring the free flow of water. Any additional mitigation requirements would of course be considered.		
Mr John Fleming	Gladman Developments			DBDLP1094	Table 6.3	Housing Allocations	Object	Gladman are promoting land at Neasham Road, Middleton St George for residential development. This site is available, suitable and deliverable and should be allocated within the Local Plan for residential development. Site plan available on Council's consultation portal ref DBDLP1076	The site was considered as part of a wider area in the HELAA (sites 309, 373 and 388) and was considered unsuitable for development. The site put forward forms part of the settlement gap between Middleton St George and Middleton One Row and is adjacent to Middleton One Row conservation area. The area forms part of the rural gap between the two villages which is outlined in policy ENV 3 Local Landscape Character. Development within this area would reduce the open space between the two villages	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								linked to Draft Local Plan (figure 3 in attachment). Site offers a realistic opportunity to deliver housing in a sustainable location and would meet the borough's housing needs. The site is well connected to the village and existing facilities. The site is subject to an outline planning application (ref 18/00275/OUT) for 280 dwellings, 60 apartments for the elderly and significant areas of public open space. The documents submitted with the application demonstrate how the scheme represents sustainable development and that it is available, suitable and deliverable. There are no technical constraints that would preclude delivery.	and would also have a negative impact upon the setting of the conservation area and local landscape character. The development limits of the Draft Local Plan have been drawn to retain the open space between the two villages. The site is therefore considered unsuitable for allocation.	
Major Frederick Greenhow MBE				DBDLP 93	6.2.13	Paragraph	Object	Housing requirement / target disputed therefore Skerningham strategic allocation is not required and should therefore should be removed from the plan.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations, including the Skerningham Strategic Allocation, are required to meet these needs.	No change recommended.
Mr Ralph Bradley				DBDLP 131	6.2.13	Paragraph	Object	Housing requirement / target disputed therefore Skerningham strategic allocation is not required and should therefore should be removed from the plan.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations, including the Skerningham Strategic Allocation, are required to meet these needs.	No change recommended.
Mrs Jennifer Bradley				DBDLP 453	6.2.13	Paragraph	Object	Housing requirement / target disputed therefore Skerningham strategic allocation is not required and should therefore should be removed from the plan.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									borough. As such the proposed housing allocations, including the Skerningham Strategic Allocation, are required to meet these needs.	
Mrs Lisa Bramfitt				DBDLP 543	6.2.13	Paragraph	Object	Housing requirement / target disputed.	Please see officer response on housing requirement and standard method.	No change recommended.
	Hellens Land	mr Baker		DBDLP 795	6.2.14	Paragraph	Neutral	For the allocated sites there should also be a recognition that yields may differ, potentially significantly, from the indicative yields in this policy and, as long as this in line with the principles of sustainability and deliverability, this will be acceptable.	Policy H 1 does state that the yield identified is for indicative purposes only and the final number of of homes to be delivered on a site will be determined by the planning application process.	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1315	6.2.14	Paragraph	Object	It is not clear if assumptions used to calculate yields have considered other policy requirements of the Consultation Draft Local Plan which could have significant impact, including the building regulations Part M standards set out in Policy H4.	Comments noted. The site yields are however indicative and it is expected that the majority of site yields will be finalised at the planning application stage. It is also considered that there is a sufficient flexibility of sites in the plan to ensure that quantitative housing needs are met.	No change recommended.
Mr David Clark				DBDLP 59	6.2.15	Paragraph	Object	"Avoiding areas which have significant physical constraints and avoiding environmentally sensitive locations." Objection to sites 251 Skerningham and 392 Elm Tree Farm as they contradict the above statement. These sites do have constraints due to the large numbers of traffic which would be generated by these sites. The road network is already congested and these sites would significantly worsen this situation. Traffic congestion would increase by people taking children to local schools and travelling to work. The new link road from the A1 to the A66 will not mitigate the impact. Regarding avoiding environmentally sensitive locations site ref 251	Please see officer response on Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes. Policy H 10 Skerningham Strategic Allocation does set out a requirement for space for two primary schools and associated nursery provision and reserving space for a secondary school. New school provision within the site will reduce residents need to travel by car. The policy also states that the site shall provide an integrated transport network focused on sustainable transport modes, including public transport, walking and cycling with strong links to adjoining communities, employment locations and Darlington town centre.	Please see officer response on Skerningham Strategic Allocation.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								Skerningham includes a burial site, a protected deserted medieval village (which is missed from Appendix C Darlington's Heritage Assets), woodland including some rare black Poplar trees that were funded locally, public footpaths and bridleway that were improved and part funded by the National lottery fund, and rare local wildlife some of which are protected under law. It is an environmentally sensitive area of green corridor and beautiful countryside which is enjoyed by residents for their mental and physical health which you state is very important within the Local Plan.		
Mr Geoffrey Carte	Councillor Neasham Parish Council			DBDLP 380	6.2.15	Paragraph	Neutral	Neasham Parish Council is concerned that the housing allocations at Middleton St George and Hurworth will generate more traffic on the country roads which serve Neasham and the surrounding area.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended.
Stephen Bibby				DBDLP 481	6.2.15	Paragraph	Object	Objection to this paragraph and Skerningham strategic allocation. Concerns raised; • Local roads are already congested. Limited access to basic services will increase the problem. • Environmentally sensitive locations will be lost. They provide wildlife habitats and recreational space for residents. • Loss of greenbelt.	Please see officer response to Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Policy H 10 Skerningham Strategic Allocation does set out requirements for the site including space for two primary schools, a secondary school and a centrally located and well connected neighbourhood centre providing facilities to meet residents day to day needs. The provision of these facilities within the site will reduce residents need to travel by car. Darlington does not have any designated green belt. This is a formal designation typically	Please see officer response on Skerningham Strategic Allocation.

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									found in larger urban areas to prevent settlements merging.	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 614	6.2.15	Paragraph	Neutral	Within the paragraph there is a list with bullet points. Bullet points can be difficult to refer to accurately and it is suggested some form of sub numbering/letter is used, eg i. ii, etc.	Comments noted. Formatting will be finalised prior to the publication stage.	No changes recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 369	6.2.17	Paragraph	Object	Objection as the current housing commitments are not included in the figures. We note the statement "The allocations are in addition to the supply of dwellings from existing commitments, some of which are currently being built out." On the basis there are 2,994 houses with consent that are presently undeveloped this "existing commitment" should be deducted from the overall "allocation".	Commitments have been counted towards the housing land supply and are set out in table 6.4 and the housing trajectory in Appendix A. It is not necessary to include them within policy H 2 as these sites already have planning permission. The commitments and allocations combined contribute to meeting the housing requirement and housing target of policy H 1.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 642	6.2.17	Paragraph	Object	CPRE notes the statement that "The allocations are in addition to the supply of dwellings from existing commitments, some of which are currently being built out." Should the "commitment" not be subtracted from the "allocation" so reducing what is already and overinflated figure?	Commitments have been counted towards the housing land supply and are set out in table 6.4 and the housing trajectory in Appendix A. It is not necessary to include them within policy H 2 as these sites already have planning permission. The commitments and allocations combined contribute to meeting the housing requirement and housing target of policy H 1.	No change recommended.
Mr Christopher Noble				DBDLP 6	Table 6.4	Housing Commitments	Support	New development in Hurworth on Tees should be strictly limited to sites 103 and 333.	Support noted.	No change recommended.
Mr Peter Hughes				DBDLP 51	Table 6.4	Housing Commitments	Support	Commitment appears suitable and sufficient for Hurworth.	Support noted.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 212	Table 6.4	Housing Commitments	Object	Darlington Friends of the Earth have the following concerns with the development at West Park Garden Village. Concerns raised:	West Park Garden Village (ref 68) has outline planning permission for residential development. Impacts on traffic congestion will have been considered when the application was determined by the Council. Traffic generated by	No change recommended.

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								• Increase in traffic congestion and degradation of air quality. • Green policy and outputs is not clear. • It is not clear that the Highways Authority Traffic Modelling justifies the housing allocation. • Any new road should have a 100m green infrastructure buffer zone.	the scheme will also be factored in to transport modelling work for the Local Plan which will test highway mitigation schemes to ensure developments do not have an unacceptable impact on the local and strategic highway network. Discharge of Reserved matters is still required for the site which will include issues such as layout, design and green infrastructure provision. Green infrastructure will be expected to be delivered on site in line with the standards contained in the adopted Planning Obligations SPD or any replacement. Any scheme will also be expected to meet the requirements of green infrastructure policies within the development plan. There are a number of planning policies in the existing development plan and emerging Local Plan which aim to prevent new development from contributing to unacceptable levels of air pollution. For example DC 1 (Sustainable Design Principles) requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption and how buildings have been made energy efficient thereby reducing carbon emissions. The locational strategy of the existing and emerging Local Plan also looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles.	
Dr Ian Bagshaw				DBDLP 310	Table 6.4	Housing Commitments	Support	The provision of sites 103 and 303 seem to satisfy the needs adequately.	Support noted.	No changes recommended.
Mrs Catherine				DBDLP 314	Table 6.4	Housing Commitments	Support	The proposed development of sites 103 and 333 will more than satisfy the needs of Hurworth for the life of the Plan	Support noted.	No change recommended.

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Noble										
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP644	6.2.18	Paragraph	Object	Concerns raised regarding the housing delivery test and the implications if the Council's housing requirement/target figure is used to assess delivery rather than the local housing need figure from the standard method.	Government guidance outlines that the figure used for the housing delivery test will be the lower of either the latest adopted housing requirement or the minimum local housing need figure. This approach has been taken so as to not punish local authorities which are aiming for growth in their Local Plans.	No change recommended.
Gerald Ia	Heighington and Coniscliffe Councillor			DBDLP260	Policy H 3	Development Limits	Object	It is good to see that the village development boundaries have been reinstated although this protection from development has been offset by Policy H 6. This policy contradicts the proposal to maintain the village size and as such is unacceptable. I assume that the reason why there have been no development boundaries shown on the Chestnuts, the new Oaklands site, Killerby, Summerhouse, Denton and Walworth is because they are designated as 'countryside' and as such are not included in any plans to build any new houses in and around these small villages.	Support for village development limits noted. The approach in policy H 6 Rural Exceptions is set out in national planning policy. Para 77 of the NPPF (2019) states, local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. Rural villages without development limits will be subject to countryside related policies of the Local Plan.	No change recommended.
Alan William Macnab				DBDLP186	Policy H 3	Development Limits	Object	The Skerningham allocation contradicts the statements within paragraph 6.3.1 related to policy H 3 Development Limits. The site will: • Destroy the existing green infrastructure of trees, woodland, hedgerows, footpaths, bridleways and open fields. • Blur the distinctiveness of existing communities and by expanding the communities' new challenges for the existing communities will be created.	Please see officer response on Skerningham Strategic Allocation and response on brownfield sites, urban sprawl and empty homes. The development limits have been extended to include the proposed strategic development locations. Skerningham is to be planned for as a single cohesive community. Barmpton and Great Burdon will remain distinctly separate from the strategic site which is illustrated in figure 6.1 Skerningham Masterplan Framework. The site is to be well integrated with the surrounding residential areas of Whinfield and Harrowgate Hill.	Please see officer response on Skerningham Strategic Allocation

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								• Destroy the open countryside between settlements and destroy the Skerningham countryside's intrinsic character and beauty because it will be urbanised, and new green areas created within the development which will take many years to mature. Questioned if Skerningham will be a separate community or will it be part of Whinfield, Great Burdon and Barmpton which surround it?		
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 645	Policy H 3	Development Limits	Object	CPRE supports the concept of this policy. However, CPRE objects to the extension of those Development Limits into the countryside as we consider many of the extensions into the countryside are unnecessary. Masterplan's for a number of sites, such as Skerningnham, Faverdale and Coniscliffe show that there would only be housing on the inner part of the sites adjacent to the town. Why is the Development Limit not drawn to cover only the potential housing areas, instead of all the site including the green infrastructure elements? Developers will look at the Development Boundary in the Local Plan and interpret it that they can build out to the Development Limit without the green infrastructure.	Please see officer response on housing requirement and standard method. It is considered that the housing requirement and housing target in the Draft Local Plan reflect the objectively assessed housing needs of the borough. As such the proposed housing allocations are required to meet these needs. The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. Please see officer response on brownfield sites, urban sprawl and empty homes for further detail. Masterplan frameworks have been prepared for Skerningham and Greater Faverdale and are set out in the Local Plan. The Skerningham site	No change required.

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									does have a large proportion of green infrastructure within it. This is included in the allocation so that the Council can plan for the area as a whole and also have greater control over the provision of the green infrastructure. Any development must accord with the masterplan framework within the Local Plan.	
Mr A Macnab	Middleton St George Parish Council			DBDLP821	Policy H 3	Development Limits	Object	The Local Plan retains the gap between Middleton St George and Middleton One Row. It should also maintain the gap between Middleton St George and Oak Tree/Airport, and the proposed development boundary should be altered to ensure this.	Suitable and sustainable sites for residential development have been proposed for allocation at Middleton St George to meet housing needs. Development limits have been extended to include these sites. A rural gap is retained between Middleton St George and Oak Tree which is outlined in policy ENV 3 Local Landscape Character.	No change recommended.
Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields		DBDLP856	Policy H 3	Development Limits	Object	The policy of defining development limits is unsound. The NPPF promotes plans and policies being sufficiently flexible to adapt to rapid change and accommodate needs not anticipated. Whist the NPPF expects local plans to identify land where development would be inappropriate, and do not explicitly preclude the use of development limits, they do encourage positively seeking opportunities to meet needs and supporting sustainable development. In this context, the use of development limits to prevent any development around rural villages in Darlington is not considered to be justified. Concerns raised that rural housing needs will not be met. However, should the development limits be retained, the Sadberge Reservoir site (HELAA site 98) should be included within the development limits of Sadberge.	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such development limits are to be utilised in the emerging Local Plan. Rural housing needs can be met via rural exception sites (policy H 6) and housing which meets criteria set out within policy H 7 Residential Development in the Countryside. Please see officer response to H 2 regarding the alternative site proposed ref DBDLP855.	No change recommended.
Mr Brian	Sadberge and Middleton St George Councillor			DBDLP973	Policy H 3	Development Limits	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to	No change recommended.

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Jones								including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP949	Policy H 3	Development Limits	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011).	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	
Steve Walk	Sadberge and Middleton St George Councillor			DBDLP 986	Policy H 3	Development Limits	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan has been prepared to support the Local Plan that identifies infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	No change recommended.
Mr Derek Dodwell	Darlington Association of Parish Councils			DBDLP 1064	Policy H 3	Development Limits	Support	DAPC supports the reintroduction of development limits, the policies restricting development outside of those limits and the policies controlling intensification within them. In particular it welcomes the general statement of the unsuitability of Rural Villages for housing development except in very limited cases (e.g. Policy H 6 – Rural Exceptions).	Support noted.	No change recommended.
Mr	Gladman Developments			DBDLP 1084	Policy H 3	Development Limits	Support	Gladman raise concerns in relation to the above policy as it only allows for	The use of development limits is a long established principle in planning, which	No change recommended.

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John Fleming								development within the limits identified on the policy maps. This approach runs counter to the proactive approach to boosting the supply of housing as required by the Framework. The Framework is clear that development that is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development.	promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such development limits are to be utilised in the emerging Local Plan.	
Paul Hunt	Persimmon Homes			DBDLP 1186	Policy H 3	Development Limits	Object	Objection to the use of development limits. The use of development limits will potentially constrain otherwise sustainable development opportunities on the urban fringe of the town. This is contrary to national policy. If the Council seek to retain the use of development limits, Berrymead Farm Phase 2 shuld be encompassed within the development limits as discussed in relation to policy H 2. (HELAA site 49. Site plan also available on the consultation portal linked to policy H 2 ref DBDLP1382).	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such development limits are to be utilised in the emerging Local Plan. With regards to the alternative site proposed for allocation (HELAA site 49) please officer response to comments on H 2, ref DBDLP1382.	No change recommended.
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP 1131	Policy H 3	Development Limits	Object	Objection to the policy as the approach is too restrictive and not in accordance with the NPPF which seeks a more flexible and positive approach. The Council have rolled forward development limits from the previous Plan or introduced new limits to development without real consideration	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								of the potential for settlements to accommodate. Should the Council consider that development limits are required, the following wording is proposed for addition to Policy H3: At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites that would both make a positive contribution to the five year supply of housing land and be well related to Development Limits of Settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the Local Plan.	development proposals. As such development limits are to be utilised in the emerging Local Plan. A review of the development limits has been undertaken. The limits from the previous plan were used as a starting point; criteria and key principles were applied and the limits amended where necessary. Main changes involve the inclusion of the proposed allocations and commitments within the development limits. The additional wording suggested for policy H 3 is not required as it is set out in policy H 1 Housing Requirement. It is considered that duplication of this element of the policy does not bring any additional benefit.	
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1167	Policy H 3	Development Limits	Object	Bellway consider that greater flexibility should be afforded to this policy to allow opportunities for windfall sites to be brought forward outwith arbitrary boundaries, and in many cases such sites could be considered more sustainable than sites located within boundary limits and separate assessment criteria could be utilised to assess a site's suitability i.e. to ensure that windfall sites are well related to existing development.	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such development limits are to be utilised in the emerging Local Plan. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility.	
Mr Alastair Mackenzie	Clerk Sadberge Parish Council			DBDLP 1225	Policy H 3	Development Limits	Support	The Parish Council agrees that development should normally be within the defined Development Limits, and that the Sadberge Development Limits (Map 14) are appropriate.	Support noted.	No change recommended.
M G Raistrick		Mr Joe Ridgeon		DBDLP 1249	Policy H 3	Development Limits	Object	Objection to the policy as the approach is too restrictive and not in accordance with the NPPF which seeks a more flexible and positive approach. The Council have rolled forward development limits from the previous Plan or introduced new limits to development without real consideration of the potential for settlements to accommodate. Should the Council consider that development limits are required, the following wording is proposed for addition to Policy H3: At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites that would both make a positive contribution to the five year supply of housing land and be well related to Development Limits of Settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the Local Plan.	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As such development limits are to be utilised in the emerging Local Plan. A review of the development limits has been undertaken. The limits from the previous plan were used as a starting point; criteria and key principles were applied and the limits amended where necessary. Main changes involve the inclusion of the proposed allocations and commitments within the development limits. The additional wording suggested for policy H 3 is not required as it is set out in policy H 1 Housing Requirement. It is considered that duplication of this element of the policy does not bring any additional benefit.	No change recommended.
Mr		Mr		DBDLP 1220	Policy H 3	Development Limits	Object	Objection to the development limits for Hurworth shown on Policies Map as	Please see officer response to policy H 2 on the alternative site proposed ref DBDLP1219.	No change recommended.

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Mark Walton		Ian Lyle						they fail to include our clients land West of Roundhill Road both within the development limit and allocation for housing development. The policies map should be amended to include the land edged red on Figure 1 attached at representation H 2 (available on the Council's consultation portal ref DBDLP1219) within the development limits for Hurworth.		
Colin McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1316	Policy H 3	Development Limits	Object	It is considered Policy H 3 requires greater flexibility. It is suggested similar wording to that recommended for Policy SH 1 is also incorporated into this policy. We suggested the following wording is inserted into the policy: "At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable sites that would both make a positive contribution to the five year supply of housing land and be well related to the development limits of the main urban area or service villages (as defined in Policy SH1) will be supported"	It is not considered necessary to provide any further flexibility to policy H 3 as there is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. The additional wording suggested for policy H 3 is not required as it is set out in policy H 1 Housing Requirement. It is considered that duplication of this element of the policy does not bring any additional benefit.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1336	Policy H 3	Development Limits	Object	One of the key restrictions to delivering homes during the plan period is development limits of previous policies preventing any development on the 'wrong' side of an arbitrary boundary. Sites adjoining settlements can be equally if not more sustainable than those within settlements. It is therefore considered that this policy should be revised to allow flexibility for appropriate developments to come	The use of development limits is a long established principle in planning, which promotes sustainable patterns of development and protects the countryside, in accordance with the aims of the NPPF (2019). Establishing boundaries around the conurbation and villages also provides certainty and clarity to decisions makers, developers and local communities. It is consistent with paragraph 16 of the Framework which states, plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to	No change recommended.

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								forward on sustainable sites that are well related to existing settlements. Settlement limits should be logical and allow for future expansion. They should not be overly restrictive and should allow for future development in and around the existing and proposed urban area. Current boundary to the north of the main urban area is considered illogical and has been fully defined by existing planning applications (site ref 3 and 8). Objection to policy H 3 in its current form and suggested that the settlement boundary is amended to ensure it is appropriate, justified and defensible. Our clients site at Burtree Lane (HELAA ref 109) should be included within the proposed boundary to ensure that suitable and appropriate sites are not dismissed unnecessarily.	development proposals. As such development limits are to be utilised in the emerging Local Plan. A review of the development limits has been undertaken. The limits from the previous plan were used as a starting point; criteria and key principles were applied and the limits amended where necessary. Main changes involve the inclusion of the proposed allocations and commitments within the development limits. It is not considered necessary to provide any further flexibility to policy H 3 as there is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. This provides a level of flexibility in the plan if some sites weren't to come forward for development. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. Please see officer response to policy H 2 ref DBDLP1335 with regards to the alternative site proposed.	
Mr Christopher Noble				DBDLP8	6.3.1	Paragraph	Support	There must be a presumption against any new development outside the Development Limits of the urban area and the town's villages.	Support noted. Any development proposed beyond the limits would be assessed against relevant local and national policies including those related to the countryside.	No change recommended.
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP381	6.3.1	Paragraph	Support	Paragraph 6.3.1 and the succeeding paragraphs succinctly emphasise the desirability of development limits, particularly being tightly drawn in rural localities.	Support noted.	No change recommended.

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Mrs Catherine Noble				DBDLP315	6.3.2	Paragraph	Support	There must be a presumption against any form of development outside the development limits.	Support noted. Any development proposed beyond the limits would be assessed against relevant local and national policies including those related to the countryside.	No change recommended.
Mr Christopher Noble				DBDLP4	6.3.3	Paragraph	Support	We agree with the revised Development Limit to the village of Hurworth on Tees, maintaining the separation from Hurworth Place and limiting proposed new housing to site numbers 103 and 333.	Support noted.	No change recommended.
Mr David Clark				DBDLP61	6.3.3	Paragraph	Object	Concerns regarding the northern development limit boundary of Darlington and where the built up area ends and countryside begins. Skerningham is classed as countryside not an urban area, so unsure why the Council wants to extend the boundaries proposed development up to the river Skerne which is natural flood plain.	A review of the development limits has been undertaken. The limits from the previous plan were used as a starting point; criteria and key principles were applied and the limits amended where necessary. Main changes involve the inclusion of the proposed allocations (including Skerningham) and commitments within the development limits. The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations. Please see officer response on brownfield sites, urban sprawl and empty homes for further detail. Policy H 10 Skerningham Strategic Allocation has a requirement to protect and enhance the River Skerne and its valley setting. The masterplan framework for the site (figure 6.1) illustrates that development will not be focused adjacent to the river Skerne and the area is identified as indicative green infrastructure. Development would also have to comply with	Please see officer response on Skerningham Strategic Allocation.

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									policy DC 4 Flood Risk & Sustainable Drainage Systems (SUDS) which directs development to areas of low flood risk. Please see officer response on Skerningham Strategic Allocation.	
Mr Christopher Noble				DBDLP 7		Housing Mix	Support	Support for the policy.	Support noted.	No change recommended.
Dr Ian Bagshaw				DBDLP 311		Housing Mix	Support	Area policies relating to the development in the countryside.	Support noted. Unclear on comment made. The policy requires that proposals for housing development will be expected to provide an appropriate mix of housing as identified within the most up to date Strategic Housing Market Assessment or by other evidence.	No change recommended.
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP 42	Policy H 4	Housing Mix	Object	Support the reference to custom and self build housing. Sites should be specifically allocated in the Plan for such development. Without prejudice to other objections it is submitted that such development can be sustainably accommodated in / close to the Rural Villages and policy should allow for this.	The Council is currently reviewing it's self build register. If permissions are required to meet demand consideration will be given to the allocation of sites for such development. Directing this type of development to rural villages does not accord with the locational strategy for new housing development in the Local Plan. The plan approach is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations.	No changed recommended.
Gordon Pybus	Darlington Association on Disability			DBDLP 77	Policy H 4	Housing Mix	Object	Currently we are happy with 90% type 2 however 10% for type 3 is too low. What will need to be explained is how the census figures for the amount of disabled people in Darlington, which is larger than the national average, fits in with the SHMA. Also H 5 affordable requirements shows areas that will only be required to 10%, 20% and 30% affordable housing in theses area. However when you take 10% of the affordable 10% for type 3 houses it's only going to be one house in the full area.	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan.	No change recommended.

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									The requirements in the plan for affordable and accessible/adaptable dwellings have been derived utilising available evidence and considering site viability. The Council cannot request higher standards which are not supported by evidence.	
Charles Johnson	Conservative Group			DBDLP 121	Policy H 4	Housing Mix	Object	Does not refer specifically to affordable housing and we reject the principle of higher densities.	The policy does require a mix of new homes including in terms of tenure; this would include affordable housing. Policy H 5 Affordable Housing also sets out requirements for affordable homes from market schemes across the borough. The NPPF (2019) outlines that planning policies and decisions should support development that makes efficient use of land. Minimum density standards are suggested for cities, town centres and other locations that are well served by public transport. Policy H 4 is in line with this approach.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 213	Policy H 4	Housing Mix	Neutral	Energy efficient building standards should be adopted; e.g. passivhaus standards. We should not be locked into unsustainable energy demand. Roof mounted solar arrays should be considered.	Since 2015 there has been significant change in Government policy on climate change, renewable energy and energy efficiency standards. Ministerial Statements have been made on the subject, including a restriction on the standards authorities can place on domestic dwellings, however legislation is still to be passed on these issues creating some uncertainty. As such the Council is looking to undertake a joint approach with the other Tees Valley authorities on these matters. This is likely to be dealt with in a separate document such as a supplementary planing document.	No change recommended.
Mrs Lisa Bramfitt				DBDLP 548	Policy H 4	Housing Mix	Neutral	Not only must the buildings reflect the demand for fully inclusive accessibility, there must be similar consideration given to vehicle parking. Too many new builds sacrifice adequate car parking in place of additional buildings.	New development shall adhere to policy IN 4 Parking Provision including Electric Vehicle Charging. The policy states that new development will be required to provide safe and secure vehicle parking. The number of spaces provided and the nature of the provision will have regard to local circumstances and the standards set out in the Tees Valley Highway Design Guide or any successor.	No change recommended.

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Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP646	Policy H 4	Housing Mix	Support	CPRE supports this policy. There is a list of bullet points within the policy. Bullet points can be difficult to refer to accurately and it is suggested some form of sub numbering/letter is used, eg i. ii, etc.	Support noted. Formatting will be finalised prior to the publication stage.	No change recommended.
Mr Brian Jones	Sadberge and Middleton St George Councillor			DBDLP974	Policy H 4	Housing Mix	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan is has been prepared to support the Local Plan that identifies infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	No change recommended.
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP950	Policy H 4	Housing Mix	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									An infrastructure plan has been prepared to support the Local Plan and that identifies infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	
Steve York	Sadberge and Middleton St George Councillor			DBDLP 987	Policy H 4	Housing Mix	Object	Concern regarding the amount of housing proposed at Middleton St George. Problems relating to over development should be considered including potential impacts on community cohesion and local services. New housing estates should have attractive tree planting and highways which reduce speeds.	Please see officer response on brownfield sites, urban sprawl and empty homes which provides detail on the site selection process. The policies and principles set out in the Local Plan aim to create cohesive mixed communities which are well integrated to existing settlements. Housing policies in the plan also encourage a mix of new homes including specialised housing suitable for older people and affordable housing. An infrastructure plan has been prepared to support the Local Plan that identifies infrastructure required to support new development, including local services. Tree planting is promoted and encouraged via policy ENV 7 (Biodiversity and Geodiversity and Development) of the Draft Local Plan and via the adopted Design of New Development Supplementary Planning Document (2011). New developments will have to meet the minimum highway standards set out in the Tees Valley Design Guide & Specification. This document sets out approaches and methods to reduce vehicle speeds.	No change recommended.

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N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1115	Policy H 4	Housing Mix	Object	Support of the overall flexibility of this policy in terms of house types, sizes and tenure, however we have concerns regarding the requirements in relation to category 2 requirements and category 3 requirements and believes their current inclusion in the policy renders it unsound for being unjustified. The optional technical standards should be clearly evidenced in terms of need and viability. Part 2 of the 2015 SHMA is severely lacking in detail and does not justify the specific requirements of the policy. To ensure the soundness of the policy these requirements should be deleted.	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy.	No change recommended.
Page 587	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP 1158	Policy H 4	Housing Mix	Object	Support for the general aims of the policy. Objection to its wording. CCE is concerned that the policy fails to include for viability of development. As set out within paragraph 173 of the Framework, development should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It is considered that additional evidence should be provided by the Council for seeking Category 2 and 3 standards. This evidence should demonstrate that the Council has fully assessed the requirement for these standards in the local area, taking into account other relevant factors, including viability.	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy.	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1317	Policy H 4	Housing Mix	Object	Support for the general principle of the policy. Concerns raised regarding the introduction of building regulations Part M standards which will impact on site viability, site densities, residential	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								unit numbers and absorption into the market. The evidence to justify the need of the standards is set out in Part 2 of the 2015 SHMA. This evidence is lacking and falls short of what is required by the NPPG. Requirements should be factored in to assumptions on site yields. The requirements may mean that many of the sites in the plan become unviable and this must be considered through a plan wide viability assessment.	M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to support the plan and will consider the requirements of the policy. Comments noted regarding impact on site yield. The site yields are however indicative and it is expected that the majority of site yields will be finalised at the planning application stage. It is also considered that there is a sufficient flexibility of sites in the plan to ensure that quantitative housing needs are met.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1337	Policy H 4	Housing Mix	Object	Support for the general aim of the policy. Concerns with the wording of the policy and object on the basis that the policy is unjustified, ineffective, not positively planned and inconsistent with national policy and therefore unsound. Concern that the policy fails to include for viability of development and this should be included in policy wording. The policy also needs to be adaptable over the plan period and reflect changing requirements that may emerge up to 2036. Additional evidence should be provided by the Council for seeking category 2 and 3 building regulation standards. Evidence should identify the need for the requirements and also account for viability.	It is considered that the policy is adaptable over the plan period as it acknowledges that other evidence can be utilised to support a particular housing mix. The plan will also be reviewed at least every five years and consideration will be given to updating evidence base documents such as the SHMA. It is not considered necessary to add any policy wording relating to viability, however issues of housing mix and viability can be negotiate at the planning application stage. Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. A Local Plan Viability Assessment is also being prepared to	No change recommended.

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									support the plan and will consider the requirements of the policy.	
	Godolphin Developments Ltd	Ms Jennifer Nye	Lichfields	DBDLP 1270	Policy H 4	Housing Mix	Object	Recognition of the importance of self build plots is welcomed. The policy should be strengthened to recognise that smaller locations such as Rural Villages or smaller can represent suitable and sustainable locations for self-build, including sites that are not within defined settlement limits.	The Council is currently reviewing it's self build register. If permissions are required to meet demand consideration will be given to the allocation of sites for such development. Directing this type of development to rural villages / beyond development limits, does not accord with the locational strategy for new housing development in the Local Plan. The plan approach is to focus new development within the main urban area, as urban extensions and at the larger service villages, as it is considered that these are the most sustainable locations.	No change recommended.
Miss Lucy Blakemore				DBDLP 16	6.4.3	Paragraph	Support	Support for the consideration of the housing needs of different groups of society. Questioned if houses with specialist facilities are planned to be in all new residential areas in Darlington.	The policy does not require specialist housing on every housing allocation. It does however outline that the Council will be supportive of the delivery of such schemes providing they are in suitable and sustainable locations.	No change recommended.
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP 263	6.4.3	Paragraph	Object	'Provision may come in the form of bungalows or homes which can be adapted to meet a change in need' Due to an ageing population people need to down size for convenience or health reasons so it is imperative that bungalows are included in some housing development schemes and DBC planning should insist that they are included. The word 'may' should be changed to 'must' otherwise developers will continue to ignore the needs of people who need this kind of home.	Policy H 4 does expect proposals for housing development to provide an appropriate mix of housing types, sizes and tenures to meet local needs. The Council will encourage the delivery of bungalows to meet the needs of the aging population, however it would be an unreasonable approach to insist on bungalows on every site as other types of property can assist in meeting needs of older people and site location and characteristics can influence the type/mix of dwellings which are appropriate.	No change recommended.
Mr Brian Jones	Sadberge and Middleton St George Councillor			DBDLP 975	6.4.4	Paragraph	Object	Middleton St George has a large percentage of elderly residents who need to down-size their homes. There is an increasing need for in-village services that support this age group, such as speciality housing, local shopping, medical and care services all of which need to be accessible to those without access to a car.	Policy H 4 does expect proposals for housing development to provide an appropriate mix of housing types, sizes and tenures to meet local needs. The policy also outlines that the Council will support proposals for specialised housing for older people. Any new services or facilities will be directed within the development limits of the village in	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									line with policy H 3 (Development Limits) to ensure that they are in accessible and sustainable locations. It is acknowledge that the local GPs practice has recently moved out of the village. Land is to be reserved at site 146 (Land South of Railway, MSG) for a school and community uses. Therefore land would be reserved for new facilities, including if the GP practice wished to relocate to a more central location once again.	
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP 951	6.4.4	Paragraph	Object	Middleton St George has a large percentage of elderly residents who need to down-size their homes. There is an increasing need for in-village services that support this age group, such as speciality housing, local shopping, medical and care services all of which need to be accessible to those without access to a car.	Policy H 4 does expect proposals for housing development to provide an appropriate mix of housing types, sizes and tenures to meet local needs. The policy also outlines that the Council will support proposals for specialised housing for older people. Any new services or facilities will be directed within the development limits of the village in line with policy H 3 (Development Limits) to ensure that they are in accessible and sustainable locations. It is acknowledge that the local GPs practice has recently moved out of the village. Land is to be reserved at site 146 (Land South of Railway, MSG) for a school and community uses. Therefore land would be reserved for new facilities, including if the GP practice wished to relocate to a more central location once again.	No change recommended.
Steve York	Sadberge and Middleton St George Councillor			DBDLP 988	6.4.4	Paragraph	Object	Middleton St George has a large percentage of elderly residents who need to down-size their homes. There is an increasing need for in-village services that support this age group, such as speciality housing, local shopping, medical and care services all of which need to be accessible to those without access to a car.	Policy H 4 does expect proposals for housing development to provide an appropriate mix of housing types, sizes and tenures to meet local needs. The policy also outlines that the Council will support proposals for specialised housing for older people. Any new services or facilities will be directed within the development limits of the village in line with policy H 3 (Development Limits) to ensure that they are in accessible and sustainable locations. It is acknowledge that the local GPs practice has recently moved out of the village. Land is to be reserved at site 146 (Land South of Railway, MSG) for a school and community uses. Therefore land would be	No change recommended.

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									reserved for new facilities, including if the GP practice wished to relocate to a more central location once again.	
Amy ward	Planning Manager Barratt Homes			DBDLP 1014		Affordable Housing	Support	Support for the policy. The viability of the proposed affordable housing percentages should be justified, it would be useful to see the viability assessment referenced in the plan. The Council should work with housebuilders to ensure that the percentages of affordable housing will be viable, along with other policy burdens proposed in the Local Plan. The policy states, in some individual cases these proposed levels of affordable housing may not be viable due to other site specific issues. In such circumstances applicants will be expected to submit evidence to substantiate this consisting of a viability assessment'. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. It is recognised that the Government is keen to avoid situations where viability assessments are regularly being submitted with planning applications to vary planning policy obligations. The Local Plan Viability Assessment undertaken will ensure that such situations are avoided, however this work is a high level assessment and cannot factor in site specific issues which may arise. Paragraph 57 of the NPPF (2019) outlines that particular circumstances may justify the need for a viability assessment at the application stage. Subsequently the final paragraph of the policy has been included.	No change recommended.
Gordon Pybus	Darlington Association on Disability			DBDLP 78	Policy H 5	Affordable Housing	Object	If percentages for the housing categories change then DAD will just have to deal with that has it happens but at the moment we are happy with 90% type 2 but think 10% for type 3 is too low. What will need explain is how the census figures for the amount of disabled people in Darlington which is larger than the national average fits in with the SHMA. Also H5 affordable requirements shows areas that will only be required to 10%, 20% and 30% affordable housing in theses area. However when you take 10% of the affordable 10% for type 3 houses it's only going to be one house in the full area.	Further evidence base work has been carried out on the housing needs of people with disabilities and the accessible and adaptable homes standards within the policy. The evidence within the Darlington Strategic Housing Market Assessment Update 2019: Housing for People with Disabilities (March 2019) supports the need for a target of 9% of all dwellings to meet M4(3) Category 3 requirements and 80% of all housing to meet M4(2) Category 2 requirements. This new evidence will be reflected in policy H 4 Housing Mix of the Proposed Submission Local Plan. The requirements in the plan for affordable and accessible/adaptable dwellings have been derived utilising available evidence and considering site viability. The Council cannot	No change recommended.

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									request higher standards which are not supported by evidence.	
Charles Johnson	Conservative Group			DBDLP122	Policy H 5	Affordable Housing	Object	We do not accept the percentages of affordable housing as correct. An explanation is required why there are such variations.	There is substantial need for affordable homes in Darlington Borough. It is important to maximise the amount of affordable housing that can be delivered through market housing led developments. However the Council cannot over burden developments with policy requirements which would make them unviable. As such the percentages within the affordable housing policy are set at a level which would not stifle development. The percentages have been informed by the Local Plan Viability Assessment which will be published alongside the Proposed Submission Local Plan. The requirement is set at a higher level in areas of the borough where developments can yield higher profits and therefore provide a greater number of affordable dwellings without impacting on deliverability.	No change recommended.
Gillian Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP647	Policy H 5	Affordable Housing	Object	CPRE is in favour of the concept of affordable housing, but questions whether this is the best Policy The threshold for triggering a requirement to provide affordable housing should alternatively include a minimum site size to cover very low density developments.	It is set out in National Planning Practice Guidance that contributions for affordable housing should only be sought on major housing developments (10 dwellings or above). The guidance recently changed this threshold, from 11 dwellings or more. The threshold within the policy will be updated to reflect the latest position within the guidance.	No change recommended.
Joanne Harding	Home Builders Federation			DBDLP805	Policy H 5	Affordable Housing	Object	The HBF supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. There does not appear to be a viability report available with this document and therefore at this point it is not possible for the HBF to comment on the viability of this policy or others within the document. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. The Local Plan Viability Assessment undertaken will ensure that negotiations are avoided on every site, however this work is a high level assessment and cannot factor in site specific issues which may arise. Paragraph 57 of the NPPF (2019) outlines that particular circumstances may justify the need for a	No change recommended.

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								policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.	viability assessment at the application stage. Subsequently the final paragraph of the policy has been included.	
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 839	Policy H 5	Affordable Housing	Support	Part 1 of the SHMA (2015) is identified as the current assessment of affordable need which is 160 dpa. This would be 38% of the housing requirement figure of 422 dpa, however this should be 32.5% of the Local Plan target of 492 net dwellings per annum. This level of affordable housing is unlikely to be delivered. Two options to increase delivery: • Uplift to the housing number to meet affordable needs ;and/or • Increase the affordable housing requirement set out in Policy H 5. The Draft Local Plan seeks to address affordable housing needs through the latter of these two options. However, the Plan is careful to identify future affordable requirements which will not stifle development and render sites undeliverable. Policy H 5 is clear that where a site is unable to deliver the required level of affordable housing, the onus is on the developer to provide a detailed viability assessment. The supporting text for Policy H 5 states that the Full Plan Viability Assessment will be published alongside the Proposed Submission Local Plan. Therefore it is not possible to understand whether the levels of affordable housing requirement identified in Policy H 5 are	A Local Plan Viability Assessment is being prepared, and has informed the percentage requirements within this policy. The assessment will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan.	No change recommended.

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								underpinned by the evidence identified in the viability assessment.		
Mr John Fleming	Gladman Developments			DBDLP 1087	Policy H 5	Affordable Housing	Neutral	Support for securing affordable housing to meet needs. The NPPF is clear that the delivery of affordable housing should not only take account of need but also its effects on development viability. The proposed affordable housing percentages do not appear to have been tested through a viability assessment and it is therefore not possible to provide detailed comments. Such policies should be tested through the viability assessment so that it does not hinder the delivery of sustainable development sites across the plan period.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan.	No change recommended.
Paul Hunt	Persimmon Homes			DBDLP 1190	Policy H 5	Affordable Housing	Neutral	Support to address affordable housing need. Affordable housing policies must take account of need and viability in line with the NPPF. There does not appear to be a viability report available with this document and therefore at this point it is not possible for Persimmon Homes to comment on the viability of this policy or others within the document. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Consideration should be given to uplifting the overall housing requirement to ensure adequate affordable housing is provided without undermining the viability of development sites across the borough.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. The Local Plan Viability Assessment undertaken will ensure that negotiations are avoided on every site, however this work is a high level assessment and cannot factor in site specific issues which may arise. Paragraph 57 of the NPPF (2019) outlines that particular circumstances may justify the need for a viability assessment at the application stage. Subsequently the final paragraph of the policy has been included. An uplift to the housing requirement has not been applied to increase affordable delivery. A higher requirement was assessed in the Sustainability Appraisal, based on higher jobs growth, however it was considered that this may be unrealistic and unachievable. The Council is also active in delivering affordable dwellings	No change recommended.

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									and aims to build 100 homes per year which are largely for affordable rent. This meets a large proportion of the need identified in Part 1 of the SHMA (2015). Therefore, in view of the above it is not considered appropriate or necessary to apply an uplift to the housing requirement to increase affordable delivery.	
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1117	Policy H 5	Affordable Housing	Object	Any policy requirements should be supported by appropriate evidence; the Council has not published a Whole Plan Viability Assessment. The NPPF highlights that such considerations are critical to the plan-making process. As such, it is not possible to ascertain whether the contributions to affordable housing are appropriate. Currently we therefore believe the policy is unsound for being unjustified. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Site by site negotiations should occur occasionally rather than routinely.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. The Local Plan Viability Assessment undertaken will ensure that negotiations are avoided on every site, however this work is a high level assessment and cannot factor in site specific issues which may arise. Paragraph 57 of the NPPF (2019) outlines that particular circumstances may justify the need for a viability assessment at the application stage. Subsequently the final paragraph of the policy has been included.	No change recommended.
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1169	Policy H 5	Affordable Housing	Support	Bellway supports the principle of this policy whereby schemes should make provision for affordable housing, however in line with NPPF 2012, up to date evidence on viability should be accepted to ensure that the scale of obligations and policy burden do not threaten the ability for development to be forthcoming. Current viability work undertaken for site reference no. 392 has indicated that it is able to accommodate 20% affordable housing based on detailed design work and therefore is likely to meet the aspirations of Darlington Borough Council in this respect.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan.	No change recommended.

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Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP1408	Policy H 5	Affordable Housing	Object	Whilst the supporting text references the SHMA (2015) which identifies the need for affordable housing across the Borough, no evidence appears to be available to justify the percentages applied to different wards. Banks Property wish to review such evidence before being able to form a view on whether the percentages are realistic and likely to be achieved through new development. The delivery of affordable housing is directly related to other developer contributions and how substantial the full Section 106 requirements are and therefore needs to be considered on a case by case basis. Therefore, Banks Property suggest that Policy H 5 is amended to provide a range within each category to allow flexibility regarding affordable housing taking into account other contributions that are necessary.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan. This work will ensure that the percentages required are deliverable in the majority of cases. As such it is not considered necessary to alter the policy to provide a range for the requirements. The Government is keen to avoid situations where viability assessments are regularly being submitted with planning applications to vary planning policy obligations. The Local Plan Viability Assessment undertaken will ensure that such situations are avoided, however this work is a high level assessment and cannot factor in site specific issues which may arise. Paragraph 57 of the NPPF (2019) outlines that particular circumstances may justify the need for a viability assessment at the application stage. Subsequently the final paragraph of the policy has been included and provides some flexibility.	No change recommended.
Diane Dobson				DBDLP1381	Policy H 5	Affordable Housing	Object	The building of and need for affordable housing, despite years of developments like the one you propose, is still a problem for the UK population. More often than not the housing built is still beyond the financial reach of those who need it.	Affordable housing secured on market led schemes will have to meet the definition of affordable housing as set out in the NPPF (2019). The definition is set by central Government and has recently been widened to give greater flexibility.	No change recommended.
	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP1159	Policy H 5	Affordable Housing	Object	Whilst our Client is broadly supportive of the policy, there appears to be a lack of evidence which supports this. There is no viability report available to review and further clarification is therefore required to ensure that the proposed levels required by the policy are appropriate and achievable. The NPPF sets out the importance of viability testing to ensure sites are not subject to	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan.	No change recommended.

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								obligations which would threaten their ability to be developed. Our Client therefore objects to this policy on the basis that it is unjustified, ineffective, not positively planned and inconsistent with national policy and therefore unsound.		
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1338	Policy H 5	Affordable Housing	Object	Whilst our Client is broadly supportive of the policy, there appears to be a lack of evidence which supports this. There is no viability report available to review and further clarification is therefore required to ensure that the proposed levels required by the policy are appropriate and achievable. The NPPF outlines the importance of viability testing to ensure sites are not subject to obligations which compromise delivery. Our Client therefore objects to this policy on the basis that it is unjustified, ineffective, not positively planned and inconsistent with national policy and therefore unsound. Further evidence should be provided to justify the requirements of the policy.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The house building industry will be consulted on this work. The assessment will be published alongside the Proposed Submission Local Plan.	No change recommended.
Mr Simon Nicholson				DBDLP 24	Table 6.5	Affordable Housing Requirement	Support	It is vital that housing developments incorporate a mix of housing both in size and tenure. Social cohesion requires that a mix of people by age and income can be accommodated in any new housing development. Far too often in the UK, we have seen exclusive developments taking place which do not fulfil these criteria.	Support noted. In combination policy H 4 (Housing Mix) and H 5 (Affordable Housing) aim to encourage a mix of new homes in terms of size, type and tenure. Policy H 5 sets out that affordable housing shall normally be provided on-site as part of, and integrated within, market housing to help deliver balanced communities.	No change recommended.
Mr Anthony Scarre				DBDLP 35	Table 6.5	Affordable Housing Requirement	Object	Concerns regarding a higher percentage requirement for affordable housing in the Hummersknott and Mowden areas (30%). Commented that these areas have a low number of social housing at present.	There is substantial need for affordable homes in Darlington Borough. It is important to maximise the amount of affordable housing that can be delivered through market housing led developments. However the Council cannot over burden developments with policy requirements which would make them unviable.	No change recommended.

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									As such the percentages within the affordable housing policy are set at a level which would not stifle development. The percentages have been informed by the Local Plan Viability Assessment which will be published alongside the Proposed Submission Local Plan. Hummersknott and Mowden wards have a higher percentage requirement for affordable housing as these areas are considered to be more viable for development and schemes have the potential to generate greater profits. As such sites in these areas can provide more affordable units whilst still being deliverable and viable to developers. If an area has a low number of affordable units at present, this is not a justification to not deliver affordable units in the area. In combination policies H 4 Housing Mix and H 5 Affordable Housing, aim to create mixed housing schemes in terms of size, type and tenure creating sustainable balanced communities.	
Mrs Catherine Noble				DBDLP 316	Table 6.5	Affordable Housing Requirement	Support	Developers should not be allowed, in any circumstances, to backtrack on the commitment for 30% affordable housing, particularly where they may have agreed to pay too much for the site.	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. The Local Plan Viability Assessment undertaken will ensure that the affordable housing requirements are reasonable and can be provided by developers. However this work is a high level assessment and cannot factor in site specific issues which may arise. As such there may be situations where the the affordable requirement cannot be provided. Paragraph 57 of the NPPF (2019) outlines that particular circumstances may justify the need for a viability assessment at the application stage. Subsequently the final paragraph of the policy has been included. Developers over paying for a site is not generally a justification to reduce affordable housing requirements.	No change recommended.
Stephen Bibby				DBDLP 483	Table 6.5	Affordable Housing Requirement	Neutral	I seek to understand the weighting within groupings. For example, where Hummersknott, Hurworth, Mowden, Park West, Whinfield are grouped, is it possible that the overwhelming	There is no weighting within the groupings. Any allocations or windfall schemes which come forward will be required to provide the affordable dwellings required by the policy. The amount of affordable homes delivered will be	No change recommended.

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								majority of affordable housing would be located at Whinfield (Skerningham) and Park West, with little or none in Hummersknott, Hurworth or Mowden?	dependent on the schemes which come forward in an area. Large strategic sites will provide a larger number of affordable homes due to their size.	
Kieron Warren				DBDLP285	6.5.2	Paragraph	Neutral	In relation to Section 6.5.2, which discusses a "substantial need for affordable homes", there could be a commitment to hold developers to account if they fail to provide the amount of affordable homes they had agreed on previously.	Affordable homes which are to be delivered as part of a market led scheme are secured via a s106 legal agreement or by condition linked to the planning permission. If a developer failed to provide the amount of affordable homes they had agreed on previously, they would not be complying with the legal agreement / condition therefore the development would be unlawful. If the developer wished to provide fewer affordable units they would have to negotiate this with the Council via the appropriate routes (deed of variation to the legal agreement or variation of condition application).	No change recommended.
Stephen Bibby				DBDLP484	6.5.2	Paragraph	Neutral	Presumably people in the Hummersknott, Hurworth and Mowden areas will require affordable housing. Is there any sense of the distribution, ward by ward?If affordable housing is concentrated in the Skerningham development, how will access to good quality facilities, including good schools, be assured?	Affordable housing will be required on proposed housing allocations which can be viewed on the associated policies maps. This will give an indication of distribution but will depend on site yield/size and the affordable requirement for the area. Affordable dwellings will also be required on any windfall development which may come forward in the future. The Skerningham strategic allocation will provide a large number of affordable units due to its size. Policy H 10 Skerningham Strategic Allocation sets out that the site will provide a centrally located and well connected neighbourhood centre providing local community facilities to meet day to day needs. Land is also to be reserved for two primary schools, nursery provision and a secondary school on site.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP649	6.5.3	Paragraph	Object	Questions why the Local Plan Viability Assessment has not been published with this consultation. The wording suggests that the document exists. The Submission Local Plan is usually a final version of the Plan ready for	A Local Plan Viability Assessment is being prepared, this will ensure that the affordable housing percentages, along with other planning obligations set out in the plan, are deliverable. A draft version of the assessment was utilised to inform the percentage requirements within the policy, however it was not at a suitably	No change recommended.

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								submission to government and consultation only looks at the "soundness" of the Plan and further discussion of policy is generally severely constrained to matters which have already been discussed. If anyone is unhappy at the contents of the Local Plan Viability Assessment and its resulting implications for the Local Plan their ability to challenge the document will be severely limited.	developed stage to be published alongside the Draft Local Plan. The consultation at the submission stage is focused on the soundness of the Local Plan, however this does not prevent any other comments from being submitted. Copies of representations received at this stage will also be sent to the planning inspectorate with the submission documents. One of the tests of soundness is that the plan is effective and deliverable over the plan period. As such it is considered that there would not be any issues with comments being submitted at the next stage on the Local Plan Viability Assessment as this relates to deliverability.	
Charles Johnson	Conservative Group			DBDLP 123	Policy H 6	Rural Exceptions	Object	Pleasing to note contrary to Policy H 5 affordable housing is based on need. We do not agree such dwellings should remain so for perpetuity as right to buy exists.	For clarification the percentage requirements for affordable housing as set out in policy H 5 have been set to meet affordable housing needs whilst ensuring that deliverability is not affected. Although right to buy is still available, legal controls can be used to ensure that housing on rural exception sites remain affordable in perpetuity.	No change recommended.
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP 262	Policy H 6	Rural Exceptions	Object	It is good to see that the village development boundaries have been reinstated although this protection from development has been offset by Policy H 6. This policy contradicts the proposal to maintain the village size and as such is unacceptable. I assume that the reason why there have been no development boundaries shown on the Chestnuts, the new Oaklands site, Killerby, Summerhouse, Denton and Walworth is because they are designated as 'countryside' and as such are not included in any plans to build any new houses in and around these small villages.	Support for village development limits noted. The approach in policy H 6 Rural Exceptions is set out in national planning policy. Para 77 of the NPPF (2019) states, local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. Rural villages without development limits will be subject to countryside related policies of the Local Plan.	No change recommended.

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Mr David Phillips	Darlington Friends of the Earth			DBDLP215	Policy H 6	Rural Exceptions	Neutral	How will affordable housing needs be assessed?	Affordable housing need in rural areas would have to be demonstrated by a local needs survey. This would normally be carried out by a parish council or Registered Provider and would have to satisfy the Borough Council.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP650	Policy H 6	Rural Exceptions	Object	CPRE welcomes the focus that rural exception sites should be about providing affordable housing in rural communities. Suggested figure of 10% indicating what small proportion of market housing would be acceptable. There is a danger with this policy developers/builders could sequentially apply for and build sites adjacent to the villages.	The approach in policy H 6 Rural Exceptions is set out in national planning policy. Para 77 of the NPPF (2019) states, local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. It is not considered necessary to add a percentage figure to the policy with regards to an acceptable proportion of market housing. This will be considered on a case by case basis as each site/location is different, however the Council will aim to maximise affordable units on such sites.	No change recommended.
Mrs Laura Roberts	Northumbrian Water			DBDLP737	Policy H 6	Rural Exceptions	Support	We have concerns regarding in effect windfall site allowances of any size where there is ambiguity as to the developments proposed location. Although the policy refers to the rural exceptions being within the existing service and rural villages, this does not offer clarity with regards to which of our assets within specific settlements that may be impacted.	The approach in policy H 6 Rural Exceptions is set out in national planning policy. Para 77 of the NPPF (2019) states, local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. In Part 1 of the SHMA (2015) there is limited spatial evidence on the distribution of affordable housing needed. There is no evidence of specific unmet needs for additional affordable housing in the service villages or rural villages. Consequently there is not the evidence to support the allocation of rural exception sites and a more flexible criteria based policy approach is required. A number of other local authorities in the North East region have also taken this approach. The Council is however committed to working with Northumbrian Water and consultation would be undertaken if an application was submitted for rural affordable housing, to ensure that assets are not impacted upon.	No change recommended.

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Mr Alastair Mackenzie	Clerk Sadberge Parish Council			DBDLP 1226	Policy H 6	Rural Exceptions	Support	The Parish Council agrees that Policy H 6 is appropriate, and suggests that any survey to identify a need for additional affordable homes in the Parish of Sadberge should be either carried out by the Parish Council or be subject to approval by the Parish Council.	Support noted. It is set out in the supporting text to the policy (para 6.6.2) that a local needs survey would normally be carried out by the Parish Council or a Registered Provider and would have to satisfy the Borough Council. If a planning application was submitted by a Registered Provider with a local needs assessment submitted in support, the Parish Council would be consulted as part of the application process and would be able to provide comment.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1339	Policy H 6	Rural Exceptions	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Noted.	No change recommended.
Mrs Catherine Noble				DBDLP 317	6.6.1	Paragraph	Support	Support higher percentage of affordable housing in any scheme.	Support noted. Rural exception sites should comprise of affordable homes. Only in exceptional circumstances a small proportion of market housing may be provided on these sites where it supports delivery and if it can be demonstrated via a detailed viability assessment that a 100% affordable scheme would be unviable. Housing allocations in the service villages (market led schemes) will be subject to the affordable housing requirements set out in policy H 5. The percentage requirements have been set to maximise delivery of affordable units but to ensure sites are still deliverable.	No change recommended.
Stephen Bibby				DBDLP 485	6.6.1	Paragraph	Neutral	Affordable housing developments in and around the villages seems necessary and sensible.	Comments noted.	No change recommended.
Mr Nigel Swinbank		Mr Andrew Moss	Ward Hadaway	DBDLP 43	Policy H 7	Residential Development in the Countryside	Object	Objection raised on the use of development limits in a separate comment. Notwithstanding this comment the limits used are not considered to reflect circumstances on the ground now.	Development limits remain a useful tool in planning and will remain part of the plan. More detailed reasoning is provided in the responses to Policy H 3. The development limits will not be altered to include the site area of the permission as the scheme is contrary to the locational strategy of	No change recommended.

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								As drafted the policy would prevent new garages to serve existing dwellings from being constructed in a development already approved in Neasham.	the plan. If the scheme is implemented in the future, the limits can be altered to include the development area during a Local Plan review.	
Charles Johnson	Conservative Group			DBDLP 124	Policy H 7	Residential Development in the Countryside	Object	Policy needs to be more robust.	This policy has not previously been in place and it is national policy that has proved more permissive. This policy allows more local criteria to be allied to support more sympathetic rural development.	No change recommended
Ken Walton				DBDLP 334	Policy H 7	Residential Development in the Countryside	Object	Loss of Greenspace in the countryside and objection to named Sites	Please see officer response on Skerningham.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 651	Policy H 7	Residential Development in the Countryside	Object	Policy would benefit from more precision in wording. Agricultural land should be afforded more protection in the interests of future food security.	Loss of best and most versatile agricultural land has been avoided as far as possible and has been factored into the site selection process. Currently national policy has little scope to protect agricultural land any further.	No change recommended.
Mr Jon Fleming	Gladman Developments			DBDLP 1088	Policy H 7	Residential Development in the Countryside	Neutral	Reiteration of previous objection to use of development limits.	Development limits remain a useful tool in planning and will remain part of the plan. More detailed reasoning is provided in the responses to Policy H 3. Extensions to development limits are proposed in ares to accommodate sufficient growth in the most sustainable locations for the plan period.	No change recommended
Mr Alastair Mackenzie	Clerk Sadberge Parish Council			DBDLP 1227	Policy H 7	Residential Development in the Countryside	Support	Support for policy as drafted.	Support noted.	No change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1319	Policy H 7	Residential Development in the Countryside	Neutral	For consistency with other policies in the plan it is suggested that the reference to sites well located to development limits should be considered in the event of a five year housing supply not being achieved.	Draft Policy H 1 sets out the position should a five year supply not be in place and that includes sites well related to development limits. It is not considered a duplication would help in this policy.	No change recommended

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Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1340	Policy H 7	Residential Development in the Countryside	Neutral	No objection at this time.	Noted.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 652	6.7.7	Paragraph	Neutral	Restriction on further standalone structures in barn conversions should be in the policy rather than reasoned justification.	This is already reflected in the policy at point j)	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1341	Policy H 8	Housing Intensification	Neutral	No comments at this time.	Noted.	No change recommended
Mr Steven Grabik	Architectural Liaison Officer Durham Constabulary			DBDLP 752	6.8.4	Paragraph	Neutral	Consideration should be given to adopting an Article 4 Direction in relation to HMO's.	This is something the council has considered in the past and will continue to keep under review. The Article 4 process can be undertaken separately to the local plan so should the need arise an Article 4 area could be designated.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 891		Accommodating Travelling Groups	Neutral	GTAA 2017 noted and future demand need to be communicated with HE in relation to proximity Strategic Road Network in the planning application process	Future applications for G+T sites will be in future shared through the statutory consultation process with HE	No change recommended
Charles Johnson	Conservative Group			DBDLP 125	Policy H 9	Gypsy and Travellers Accommodation	Object	Darlington has complied with the Regional Assembly maximum of sites and there is no further need for any new sites	The local GTAA replaces advice for needs of Sites and Pitches / demand has been established for the next 20 years (The Regional Assembly has been abandoned and advice is not valid any more)	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 656	Policy H 9	Gypsy and Travellers Accommodation	Object	Excessive G+T application in the countryside Unplanned development in Hurworth Moor, Brafferton and Heighington.	The policy and evidence does not support further development of G+T sides in fact it restricts it based on demand to 0 over the next 5 years. Based on this evidence applications currently can be easily refused. The G+T pitch and caravan count identifies numerous empty pitches on sites which have planning Applications in those areas.	No change recommended
Mr Mike	Durham County Council			DBDLP 1051	Policy H 9	Gypsy and Travellers	Support	DCC support the commitment to provide needs for Gypsy and Traveller community	Comments noted	No change recommended

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Allum						Accommodation				
Paul Hunt	Persimmon Homes			DBDLP1195	Policy H 9	Gypsy and Travellers Accommodation	Neutral	DBC when identifying the location of Gypsy and Traveller Sites and extensions, as it is considered that there is the potential to undermine the marketability and therefore viability of housing sites.	Issues noted on impact for future housing development	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1342	Policy H 9	Gypsy and Travellers Accommodation	Neutral	No comments at this stage	No comments	No change recommended
Mr Christopher Bell	Highways England			DBDLP892		Skerningham Strategic Allocation	Object	Given the scale of the site and its location close to A1 (M) Junction 59 to the north and its close proximity to the A66 to the south-east, this site will be of concern.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP868	6.10.1	Paragraph	Support	Whilst being part of the Skerningham Strategic Allocation, Banks Property request that land at Beaumont Hill is allocated as a stand-alone housing proposal in the same manner that site 392, Elm Tree Farm has been allocated. Further work has been done to illustrate how the area would look in more detail. Banks Property have undertaken more detailed masterplanning for the land under our control to the west of the railway line (East Coast Mainline). A number of plans have been prepared and are appended to this submission (available on the Council's Consultation Portal). Beaumont Hill is different in character to the wider Skerningham area and is severed by the East Coast Mainline. The plans demonstrate how the land to the west of the railway line can come forward as an early phase of development whilst not prejudicing the	It is acknowledged that Banks Property are committed to bringing forward a development which complies with policy H 10 and the Skerningham Masterplan Framework. It is however not considered appropriate to create a stand alone housing allocation with its own red line boundary for the site proposed as Banks Property have been involved in the masterplanning process from the start and the land is critical to the delivery of the wider masterplan area with regards to highway infrastructure. A separate site could also lead to the fragmentation of the masterplan area and the strategic allocation. There is nothing to prevent distinct parts of the strategic allocation site coming forward in advance of others provided that the adhere with the masterplan and deliver the necessary infrastructure to support development as set out in Policy H 10. The Elm Tree Farm site is different in that the landowners/developers have not been involved in the masterplanning process and the site is subject to a current planning application. Although it has been emphasised with the landowners/developers that any development	No change recommended.

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								wider Skerningham Strategic Allocation. Banks Property acknowledge the need to safeguard land for highways purposes and such an area has been safeguarded in the northern part of the site. Banks Property are committed to bringing forward a development that complies with Policy H10 as part of the Skerningham Strategic Allocation, but believe that the site should have its own red line boundary.	proposal at Elm Tree Farm would have to be well integrated with the masterplan area and accord with the principles set out in Policy H 10.	
Mr David Clark				DBDLP62	Policy H 10	Skerningham Strategic Allocation	Object	All of the principle vehicular access points already have bad traffic congestion during the morning and afternoon peak. Even is a link road goes ahead the additional traffic will cause congestion, pollution and noise.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr David Clark				DBDLP63	Policy H 10	Skerningham Strategic Allocation	Object	All of the existing community woodland should be retained. Many parts of Skerningham have flood problems.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Linda Foster				DBDLP79	Policy H 10	Skerningham Strategic Allocation	Object	Development will put a strain on town's already overstretched roads. The additional traffic will cause congestion, pollution and noise. Object to the loss of green space and countryside.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Lesley Walton				DBDLP80	Policy H 10	Skerningham Strategic Allocation	Object	Object to the Skerningham allocation.	Objection noted.	No change recommended.
Alison Jenkins				DBDLP110	Policy H 10	Skerningham Strategic Allocation	Object	Question the need for the number of houses being planned for. It will lead to	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.

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								an outward sprawl of housing around the town. Local services are already stretched and the roads are overcrowded. Development will result in the loss of countryside that should be viewed as an asset to the town and protected. The relocation of Darlington Golf Club makes no sense.	Please see officer response on housing requirement and standard method.	
Mrs Sally Tinkler				DBDLP 159	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. We should use brownfield land first. Development will put a strain on town's already overstretched services. The additional traffic will cause congestion, pollution and noise.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr David Stokes				DBDLP 94	Policy H 10	Skerningham Strategic Allocation	Object	Object to the plan.	Objection noted.	No change recommended.
Joe Penny				DBDLP 95	Policy H 10	Skerningham Strategic Allocation	Object	Brownfield sites should be prioritised for housing development. Dispute the need for this many homes. The Government estimates are much lower.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Adam Walker				DBDLP 98	Policy H 10	Skerningham Strategic Allocation	Object	Development will put a strain on town's already overstretched roads and services. Urge the Council to seek alternative locations for housing. Priority should	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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								be given to the development of brownfield land. Believe that public comments will not affect the outcome.		
Mr Graham Simpson				DBDLP 99	Policy H 10	Skerningham Strategic Allocation	Object	There has been insufficient public consultation regarding the proposals for Skerningham. Development of this site will have an adverse impact on green space and wildlife. The additional traffic will cause congestion, pollution and affect road safety. Dispute the need for this many homes. Priority should be given to the development of brownfield land. There are not the jobs of infrastructure needed to support this scale of development.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.
Jill Mitchell				DBDLP 107	Policy H 10	Skerningham Strategic Allocation	Object	Development will put a strain on town's already overstretched roads and services. Object to the loss of green space.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr David Milner				DBDLP 108	Policy H 10	Skerningham Strategic Allocation	Object	There has been no consultation with local community groups on the proposals. Development will put a strain on town's already overstretched roads. The three new access points through the Whinfield area will result in more traffic on the A1150.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.

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								The relocation of the golf club will impact on Skerningham Community Woodland/wildlife habitat. The development will have no environmental benefits for the area.		
Charles Johnson	Conservative Group			DBDLP 126	Policy H 10	Skerningham Strategic Allocation	Neutral	Much of this policy is aspiration and can only be supported as a proposal.	Comment noted.	No change recommended.
Sue Mann				DBDLP 172	Policy H 10	Skerningham Strategic Allocation	Object	Object to the Skerningham Strategic Allocation.	Objection noted.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 214	Policy H 10	Skerningham Strategic Allocation	Object	The allocation is not required. There is no need for a Northern Link Road or a local distributor road. Consider a four way junction at the existing Junction 57 instead. How will this fit with the Brightwater Project?	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Alan Burdess				DBDLP 278	Policy H 10	Skerningham Strategic Allocation	Object	Development will take up green land. Development will put a strain on the town's already overstretched roads and services. There are not the jobs needed to support this scale of development.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Beryl Burdess				DBDLP 279	Policy H 10	Skerningham Strategic Allocation	Object	Where are all these people coming from? Where are the jobs for all these people? There are too many empty homes already. There are not enough services to support development.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.

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								Access is a major issue. Whilst the proposed bypass may remove heavy goods vehicles it will not help with the huge numbers of cars.		
Simon Bainbridge				DBDLP 404	Policy H 10	Skerningham Strategic Allocation	Object	The Skerningham Masterplan is at odds with the Council's Green Infrastructure Strategy and standards. Any development on this area, including the golf club will be severely detrimental to the wildlife and contribute to the national devastation of woodland and farmland bird numbers. Darlington Council's designations such as Skerningham Countryside park , Green Infrastructure strategy , Skerningham Community Woodland , Designated Wildlife Area and Green Corridors all seem to be forgotten.	Please see officer response on the Skerningham Strategic Allocation. The strategies and designations referred to have been taken into account in the drafting of Policy H 10 and in developing the Masterplan Framework as reflected in the provisions made in the policy relating to the community woodland, heritage assets and green infrastructure network. The Skerningham Strategic Allocation policy should not be read in isolation from the other policies in the Local Plan. The plan as a whole will need to be considered when determining any future planning application on this site.	No change recommended.
Jeanette French				DBDLP 429	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. Object to the loss of woodland and green space. Priority should be given to the development of brownfield land. Development will cause extra traffic, air pollution and health issues. There are not enough services.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.
Peter Voss				DBDLP 459	Policy H 10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes when we have empty ones available. We do not have the infrastructure to cope with development of this size.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.

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								Priority should be given to the development of brownfield land. How is the Council going to cope as every time we ask for a problem to be solved we are given the stock answer of "sorry but we have had to introduce so many cuts we can't afford to do them".		
Pauline Burton				DBDLP515	Policy H10	Skerningham Strategic Allocation	Object	How will this proposal help to save the town centre?	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Pauline Burton				DBDLP516	Policy H10	Skerningham Strategic Allocation	Object	There has been insufficient public consultation regarding the proposals for Skerningham. Priority should be given to the development of brownfield land. The impact of this development will be irreversible.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mrs Anne Bland				DBDLP552	Policy H10	Skerningham Strategic Allocation	Object	Object to the loss of green space around the Whinfield area which is a loss to humans and wildlife. Agree with the objections raised by the Whinfield Resident's Association.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
G Martin				DBDLP559	Policy H10	Skerningham Strategic Allocation	Object	Dispute the need for this many homes. The Government figure is much lower. Development will put a strain on the town's already overstretched roads and services. Priority should be given to the development of brownfield land. What about developing the West End! The town is going downhill and needs improvement.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.

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Mr Andrew Burton				DBDLP586	Policy H 10	Skerningham Strategic Allocation	Object	How will this proposal help to save the town centre?	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr Andrew Burton				DBDLP587	Policy H 10	Skerningham Strategic Allocation	Object	There has been insufficient public consultation regarding the proposals for Skerningham. Priority should be given to the development of brownfield land. The impact of this development will be irreversible.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on brownfield sites, urban sprawl and empty homes.	Please see officer response on the Skerningham Strategic Allocation.
Mrs Laura Roberts	Northumbrian Water			DBDLP738	Policy H 10	Skerningham Strategic Allocation	Neutral	Welcome the allocation of Skerningham and pleased to see the policy states that the development shall incorporate sustainable drainage systems. All surface water flows could discharge directly to the watercourse via sustainable drainage systems which will require a lifetime maintenance plan.	Comment noted.	No change recommended.
Mrs H Kilcran				DBDLP719	Policy H 10	Skerningham Strategic Allocation	Object	Concerned about disruption during the construction period. The additional traffic will cause congestion, pollution and affect road safety. Development will put a strain on the town's already overstretched services (including schools, health care, dental care and social services). Children use the tracks/green space for walking and cycling, encouraging them to be active. This development will impact greatly on this.	Please see officer response on the Skerningham Strategic Allocation. Whilst it is acknowledged that there is always some disruption during construction, this is temporary and the impact will be controlled by appropriate conditions placed on the planning permission.	No change recommended.

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Mr Vic Mcintosh				DBDLP733	Policy H 10	Skerningham Strategic Allocation	Object	Development of this site will have an adverse impact on the local environment. Dispute the need for this many homes. The Government figure is much lower. Priority should be given to the development of brownfield land. If a link road goes ahead any traffic removed will be replaced by that from the Skerningham development resulting in further congestion, pollution and noise. Development will put a strain on the town's already overstretched services. Barmpton Lane will not cope with the increased volume of traffic.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.
Mr Christopher Bell	Highways England			DBDLP909	Policy H 10	Skerningham Strategic Allocation	Object	Given the sites proximity to the A1(M) Junction 59 and the A66 a significant proportion of trips from this development is likely to utilise the Strategic Road Network potentially impacting on its operation during peak periods. However, the likely trip generation and trip distribution of development trips would have to be confirmed in order to ascertain the scale of impact at the SRN.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Miss Katherine Workman				DBDLP944	Policy H 10	Skerningham Strategic Allocation	Object	This development has been hidden until very recently, a development of this size surely requires its own entity? Darlington has many areas in need of redevelopment. Priority should be given to the development of brownfield land. Dispute the need for this many homes.	Please see officer response on the Skerningham Strategic Allocation. Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	No change recommended.

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Mr Roger Fitzpatrick-Odiamier				DBDLP998	Policy H 10	Skerningham Strategic Allocation	Object	I would urge the council's responsibilities under the Human Rights Act, in particular Protocol 1, Article 1 which states that a person has the right to peaceful enjoyment of all their possessions which includes their home and other land. I believe that the proposed development allocation at Skerningham would have a dominating impact on me and my right to the quiet enjoyment of my property. Additionally, Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings and I would like to object on these grounds against the Skerningham Strategic development.	Article 8 and Article 1 of Protocol 1 of the Human Rights Act 1998 are not an absolute right and must be balanced against other factors, such as the interests of the wider community, or to protect other peoples's rights. The planning system by its very nature respects the rights of the individual whilst acting in the interest of the wider community. It is an inherent part of the decision-making process for the Council to consider the effects that the Local Plan will have on individuals and weigh these against the wider public interest in determining whether development proposals should be allowed to proceed. In carrying out this balancing exercise the Council will of course wish to be satisfied that it has acted proportionately. The plan making process includes a number of opportunities for public involvement in shaping the content of the plan and culminates in an examination in public where the views of objectors to the plan will be heard by an independent Inspector. Consideration of the effect of the emerging Local Plan on different groups within Darlington will be assessed within an Equality Impact Assessment to be published alongside the Proposed Submission Local Plan. Residents will also be able to comment on planning applications for sites allocated in the Local Plan when they are submitted to the Council. The Local Plan includes a number of policies that will help to safeguard amenity, and thereby the rights of existing residents. In particular, Policy DC 3: Safeguarding Amenity stipulates that new development should be sited, designed and laid out to protect the amenity of existing users of neighbouring land and buildings and the intended users of the new development, whilst Policy DC 2: Health and Wellbeing includes a number of criteria aimed at supporting improvements to the health and wellbeing of people in Darlington.	No changes recommended.

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									The case quoted from 1997 in which the protection of the Countryside was held to fall within interests set out in Article 8(2) by which a planning application may interfere with the right to a person's home is noted. However, the Local Plan seeks to protect the countryside through adopting a strategy that directs development towards the Darlington town and larger service villages. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where land is available, and it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal and other related evidence. In addition, through Policy ENV 3: Local Landscape Character, the Council seeks to protect the character and local distinctiveness of the Borough's urban area, villages and rural area.	
Ms Emily Hrycan	Historic England			DBDLP1108	Policy H10	Skerningham Strategic Allocation	Object	The site includes a number of Grade II heritage assets and may affect the setting of some further afield. It is also adjacent to a scheduled monument, Ketton Bridge, a packhorse bridge to the north of the allocation area. The area and its heritage assets are in an area characterised by its agricultural character and formed in part by their rural setting which makes an important contribution to their significance and understanding. The NPPF considers Scheduled Monuments, to be of the highest significance and any substantial harm to or loss of these designated assets (including setting) should be wholly exceptional. The NPPF considers that any substantial harm to the significance or loss of a Grade II listed heritage	Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. Appropriate mitigation measures identified have been included within policy and/or supporting text.	Appropriate mitigation measures identified as part of the Heritage Impact Assessment have been included within the the policy, supporting text and/or the Housing and Employment Statements as appropriate.

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								asset (including setting) should be exceptional. The Plan and the supporting evidence base including the SA should be amended to ensure that it includes a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for development and to ensure that there are appropriate site specific mitigation measures which will minimise harm to the historic environment in line with the requirements of the NPPF and the 1990 Act.		
Paul Hunt	Persimmon Homes			DBDLP 1196	Policy H 10	Skerningham Strategic Allocation	Neutral	Development of the Berrymead Phase 2 Land will be able to support the delivery of the Skerningham allocation through proportional contributions to necessary shared infrastructure items (such as schools, community centre, A167 access and highways network mitigation).	Please see officer response on the Skerningham Strategic Allocation. The Skerningham Strategic Allocation will be expected to provide all of the infrastructure necessary to support development on the site, and it will be unnecessary to rely on the infrastructure that could be provided on other potential development sites in the area. Development of the Skerningham Strategic Allocation site will be carefully phased so that new infrastructure and facilities are provided alongside, or where appropriate in advance of, new properties. Phasing will ensure that new communities are supported by appropriate infrastructure, and to minimise the pressure placed by development on existing services and facilities in the area.	No change recommended.
Mr Alastair Mackenzie	Clerk Sadberge Parish Council			DBDLP 1228	Policy H 10	Skerningham Strategic Allocation	Support	The Parish Council supports the proposal to construct a new Northern Link Road connecting the A66 east of Darlington to the A1(M) north of Darlington.	Support noted.	No change recommended.
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 1377	Policy H 10	Skerningham Strategic Allocation	Support	With forward funding of infrastructure, an earlier than anticipated start on site and faster build out rates, substantially more homes (an additional 630 dwellings) could be built during the	Comment noted. The housing trajectory contained in the Local Plan provides an estimate of the amount of dwellings expected to be delivered over the plan period to 2036. It has been informed by site information and standard	No change recommended.

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								plan period. Recommend changes to the policy to reflect this.	assumptions, including factors such as timescales for obtaining planning permission and average build rates. As stated in the introduction to Appendix A, the housing trajectory does not place any phasing restrictions on the sites allocated in the plan and they may come forward sooner than indicated.	
Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP 1406	Policy H 10	Skerningham Strategic Allocation	Support	Policy support for H10 Does not take account of the Berrymead and South of Burtree Lane debvelopemnet to support best location for retail and Local Centre facilities	Support noted	No change recommended
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1235	Policy H 10	Skerningham Strategic Allocation	Object	Whilst Taylor Wimpey fully support the identification of their land at part of the wider strategic allocation, they do not support the Skerningham Masterplan Framework at Figure 6.1 of the Draft Local Plan as it currently shows their land (0.66 ha adjacent to the A167) as Strategic Green Infrastructure. Taylor Wimpey request that their land is identified for residential development on the Masterplan Framework or the site is identified as a discrete housing allocation in its own right. The site is deliverable and can come forward now.	As recognised in Policy H 10, the Skerningham Masterplan Framework provides an illustration of the key principles for development on the Skerningham site, including the broad locations for different land uses and facilities. As such, this would not necessarily preclude the development of housing on this small corner of the site, subject to appropriate siting design and layout, and the retention and enhancement of the right of way across the site.	No change recommended.
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP 1259	Policy H 10	Skerningham Strategic Allocation	Support	The proposed allocation accords with paragraph 52 of the NPPF. The Policy requires the submission of a "comprehensive masterplan" to ensure cohesive development is delivered at Skerningham. It is also recognised in the policy that a "network of green and blue infrastructure" is required to make the proposals acceptable. Support from all of the landowners will be essential to ensure deliverability of the wider scheme, as this is key to	Support noted. Please see officer response on the Skerningham Strategic Allocation.	No change recommended.

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								ensuring the acceptability of the whole Strategic Allocation by mitigating the harm caused by the development, as well as being required as part of Policy H10, ENV4 and ENV5.		
Mr Mark Walton		Mr Ian Lyle		DBDLP 1221	Policy H 10	Skerningham Strategic Allocation	Object	There are significant uncertainties about the likely timetable for such a scheme and its associated infrastructure, and ancillary facilities (schools, shops etc) necessary to make the development sustainable. Reducing the size of the site or replacing it with a range of smaller sites around the urban area and in service villages like Hurworth would be a more deliverable strategy.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1313	Policy H 10	Skerningham Strategic Allocation	Object	Part of wider response logged against Policy H 2. The site is subject to significant infrastructure requirements being delivered, although the policy does not yet establish phasing for the various elements of infrastructure. The Council need additional evidence to confirm the site is capable of delivering the stated 150 units per annum without any potential slippage from 2026/2027 onwards. The strategy places too much reliance on the delivery of large strategic sites to achieve the housing requirements.	Please see officer response on the Skerningham Strategic Allocation. The housing trajectory contained in the Local Plan provides an estimate of the amount of dwellings expected to be delivered over the plan period to 2036. It has been informed by site information and standard assumptions, including factors such as timescales for obtaining planning permission and average build rates. The housing trajectory has an average build out rate of 30 dwellings per annum on most sites. This has been increased where there is known to be more than one builder developing a site or more than one builder with an interest in a site.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1343	Policy H 10	Skerningham Strategic Allocation	Object	Our Client is supportive of this policy and welcomes the Council's commitment to delivering this urban extension. However, the policy fails to include for viability of development.	Comments noted. Please see officer response on the Skerningham Strategic Allocation. The Council has prepared a Whole Plan Viability Assessment in support of the Local Plan that has been used to inform its decisions on the viability of allocation sites, taking into	No change recommended.

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								Each application for development should be considered on its merits. Unrealistic requirements can be an obstacle to house building and in order to promote development and increase the supply of housing, the Council should include flexibility and the consideration of viability in the policy wording. Housing density should be based on local circumstances and not harm the overall objective of boosting significantly housing supply.	account, and testing affordable housing standards and other proposed costs to development resulting from proposed local planning policies, as required by the NPPF and NPPG.	
Canon Chris Beales				DBDLP 349	6.10.2	Paragraph	Support	Skerningham will, over the coming years, become a small town. Ideas and plans are very exciting. Darlington can model here a really imaginative, forward looking, well designed and integrated community. Placemaking is essential - a place where people love to live is the goal - so local facilities and very well designed, mixed, integrated housing are essential (along the lines I have written about above). If innovative smaller developers, rather than the "usual suspects", can be attracted to invest, that would be very desirable. Where land is owned by a local authority or other public body, or what should be a philanthropic organisation like the Church Commissioners, could there not be a new kind of joint development or a covenant put on the land being sold, requiring things like community facilities to be built and maintained?	Support noted.	No change recommended.
Mr	Member	Mr	Member	DBDLP 373	6.10.3	Paragraph	Object	There has been insufficient consultation with local residents regarding the	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.

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Simon Bainbridge	Barmpton and Skerningham Preservation Group	Simon Bainbridge	Barmpton and Skerningham Preservation Group					proposals for Skerningham, yet there appears to have been considerable co-operation between DBC and the landowners/site promoters. The so-called “consultation" by the site promoters in Autumn 2017, with DBC's backing was as a result of pressure from local residents and groups, was presented as a ‘fait accompli'. DBC should have involved the public at a much earlier stage.		
Mr David Phillips	Darlington Friends of the Earth			DBDLP216	6.10.4	Paragraph	Object	Why is the Development Limit not drawn to cover only the potential housing areas, instead of the entire site including the green infrastructure elements? Developers will take it that they can build up to the limit.	Please see officer response on the Skerningham Strategic Allocation. The development limit has been drawn around the entire extent of the Skerningham Strategic Allocation site in the Local Plan in order to allow a comprehensive approach to be taken to the masterplanning of the whole site, and to ensure the delivery of improvements to the Skerne Valley Area alongside development on Darlington’s urban edge. The Masterplan Framework (Figure 6.1) illustrates the key principles for the development of the Skerningham site and will be the basis on which the emerging Masterplan is developed. As set out in Policy H 10, the Council will only approve planning applications that adhere with the masterplan for this site, and that deliver the necessary local and strategic infrastructure (including green infrastructure) to support the development. The southern side of the River Skerne Valley is identified on the framework plan as strategic green infrastructure, reflecting the fact that much of this area is identified as part of a Strategic Green Corridor in the Council’s Green Infrastructure Strategy. However, until the detailed plans for the site are finalised as part of the planning application process the exact extent of the built up area forming the new northern edge of the town is not known and it is therefore	No change recommended.

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									not possible to accurately define the extent of the development limit at this stage. The Council will consider the need to amend the development limit around the Skernignham site, to reflect the final position on the extent of the built up area of the site, during future reviews of the Local Plan, due to take place at least every five years.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP 217	Figure 6.1	Skerningham Masterplan Framework	Object	Why is the Development Limit not drawn to cover only the potential housing areas, instead of the entire site including the green infrastructure elements? Developers will take it that they can build up to the limit.	Please see officer response on the Skerningham Strategic Allocation. The development limit has been drawn around the entire extent of the Skerningham Strategic Allocation site in the Local Plan in order to allow a comprehensive approach to be taken to the masterplanning of the whole site, and to ensure the delivery of improvements to the Skerne Valley Area alongside development on Darlington's urban edge. The Masterplan Framework (Figure 6.1) illustrates the key principles for the development of the Skerningham site and will be the basis on which the emerging Masterplan is developed. As set out in Policy H 10, the Council will only approve planning applications that adhere with the masterplan for this site, and that deliver the necessary local and strategic infrastructure (including green infrastructure) to support the development. The southern side of the River Skerne Valley is identified on the framework plan as strategic green infrastructure, reflecting the fact that much of this area is identified as part of a Strategic Green Corridor in the Council's Green Infrastructure Strategy. However, until detailed plans for the site are finalised as part of the planning application process the exact extent of the built up area forming the new northern edge of the town is not known and it is therefore not possible to accurately define the extent of the development limit at this stage. The Council will consider the need to amend the development limit around the Skernignham site, to reflect the final position on the extent of the built up area of the site, during future reviews of	No change recommended.

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									the Local Plan, due to take place at least every five years.	
Mr David Clark				DBDLP64	6.10.5	Paragraph	Object	Object strongly to this proposed development.	Objection noted.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP375	6.10.5	Paragraph	Object	There are significant infrastructure requirements needed but no indication of when they will be delivered. Conversely the infrastructure could be built but is circumstances change, as they are likely to do, there is no guarantee that any more than 1800 homes will be built. The scale of the site is beyond the needs of Darlington and out of scale with the town and its facilities.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP1380	6.10.12	Paragraph	Neutral	Request a change to the paragraph to allow flexibility on the depth of habitat buffers.	The requirement to provide a habitat buffer of at least 50 metres is considered appropriate to create viable ecological corridors, enabling the movement of wildlife within the landscape and allowing for the multifunctional use of such space (e.g. combined with public access, landscaping, SUDs etc.).	No change recommended.
Mrs Lisa Bramfitt				DBDLP556	6.10.13	Paragraph	Object	Object to the loss of recreational spaces due to impact on peoples health and wellbeing.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP218	6.11.1	Paragraph	Object	Area may be better suited to employment uses due to proximity to A1(M).	Faverdale is a strategic mixed use allocation and will include a significant proportion of employment uses in suitable ares to be informed by the masterplan. Housing within the area would have to have adequate mitigation to deal with any noise or air pollution issues from the A1(M) or adjoining employment uses.	No change recommended
Simon Bainbridge				DBDLP403	6.11.1	Paragraph	Neutral	Area suitable for additional housing development and has a good range of existing services. Loss of agricultural land a concern.	Comments noted. Loss of agricultural land is a consideration and has been reflected in site assessment criteria within the supporting Sustainability Appraisal.	No change recommended

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Charles Johnson	Conservative Group			DBDLP 127	Policy H 11	Greater Faverdale - Strategic Site Allocation	Neutral	Support for proposed development.	Comment noted.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 409	Policy H 11	Greater Faverdale - Strategic Site Allocation	Support	Faverdale considered a more logical location for extension for housing than Skerningham.	Support for residential use noted	No change recommended
Mrs Lisa Bramfitt				DBDLP 557	Policy H 11	Greater Faverdale - Strategic Site Allocation	Support	More sustainable location for development. Consider introducing park and ride at West Park/Faverdale and Lingefield Point.	Support noted	No change recommended
Gillian Ellison	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 660	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	Housing requirement is too high. Delivering housing on this site at the same time as Skerningham will cause the local housing market to fail. If allocated, this site should be used for employment development in line with current Local Plan.	Please see officer response to housing requirement. If delivery rate does slow we will keep this under review for future reviews of the plan which the government requires to take place at least every 5 years.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 906	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	Housing Site The site has the potential for impact on junction 58 of the A1(M). Given the scale of the site as an employment allocation and proximity to the A1(M) it will be 'of concern' for Highways England. The likely trip generation and distribution would have to be confirmed in order to ascertain the scale of impact on the Strategic Road Network.	Concern noted but taken forward by site specific modelling to identify and mitigate issues	No change recommended
Mr Christopher Bell	Highways England			DBDLP 927	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	**Employment site aspect** The site has the potential for impact on junction 58 of the A1(M). Given the scale of the site as an employment allocation and proximity to the A1(M)	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended

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								it will be 'of concern' for Highways England. The likely trip generation and distribution would have to be confirmed in order to ascertain the scale of impact on the Strategic Road Network.		
	Hellens Land	mr Baker		DBDLP 801	Policy H 11	Greater Faverdale - Strategic Site Allocation	Support	Support the allocation of Greater Faverdale as a strategic site. The site offers a number of significant locational and sustainable benefits. Providing a mix of uses on the site will facilitate the delivery of speculative employment land by increasing viability across the site. The site is capable of delivering a number of improvements and mitigation.	Support noted	No change recommended
Mr Mark Walton		Mr Ian Lyle		DBDLP 1222	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	Significant uncertainties about the timetable and associated infrastructure/facilities for the site. The Borough would be better served by smaller and more deliverable sites around the urban area and service villages.	Comments noted and alternative options for housing delivery have been tested including the provision of allocations in service villages. Please see the officer response on housing requirement and also the consideration of alternatives within the Sustainability Appraisal.	No change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1310	Policy H 11	Greater Faverdale - Strategic Site Allocation	Object	Concerns raised with the assumed delivery rate for the site and doubts that the site will deliver 810 homes by 2036. No evidence of an application becoming forthcoming, no known developer commitment and significant infrastructure requirements for the scheme. Multiple outlets rarely results in a simple doubling of outputs. The plan places too much reliance on the delivery of large strategic sites to achieve housing numbers.	The Council has been and is continuing to engage with the main landowner and developer at Faverdale, in order to identify all of the constraints and opportunities involved, and to prepare a masterplan for the area. A substantial amount of work has been undertaken by the landowner on the site, including but not limited to a masterplan framework, heritage assessment, archaeology assessment, ecology surveys and report, flood risk assessment, landscape assessment, highways assessment and utilities assessment. A visioning document and delivery strategy have also been prepared to support the masterplan. A pre-application enquiry has also been submitted to the Council and discussions are ongoing. Evidence on the anticipated	No change recommended

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									delivery rates of the site has been obtained from developers and it is expected that there will be multiple house builders on the site. Despite this, delivery for this site over the plan period has been reduced for the next stage of plan preparation given latest information. It is considered that the estimated delivery in the trajectory is appropriate, allowing for suitable lead in times. A range of sites are proposed for allocation to meet housing needs. Paragraph 72 of the NPPF (2019) also supports the Council's approach in allocating large urban extensions as it states, "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." Allocating large strategic sites rather than a number of smaller sites also ensures that the area is planned as a single cohesive sustainable development fully supported by the necessary infrastructure.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1344	Policy H 11	Greater Faverdale - Strategic Site Allocation	Neutral	Holding response for a future date if required	Comment noted.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 410	6.11.8	Paragraph	Neutral	Site capable of accommodating more than 2000 houses.	Comment noted. Policy H 11 provides for circa 2000 homes on the site.	No change recommended.
Ms Julie Nixon				DBDLP 333	7	EMPLOYMENT FOR ECONOMIC GROWTH	Neutral	Ambition for future kind of business attracted to Darlington to support environmentally sustainable business for the benefit of the borough	Comments noted	No change recommended

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Mrs Laura Roberts	Northumbrian Water			DBDLP740	7	EMPLOYMENT FOR ECONOMIC GROWTH	Support	Support for policies and request to guide investors to NWGroup for early in the development process in discussions for waste water effluent / water requirements and SUDS	Support noted	No change recommended
Mr Christopher Bell	Highways England			DBDLP894	7	EMPLOYMENT FOR ECONOMIC GROWTH	Neutral	Summary of Policies under Sect 7 Highways England wants to understand size and detailed proposal under E1 -E4 to evaluate impact on Strategic Road Network.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP1205	7	EMPLOYMENT FOR ECONOMIC GROWTH	Support	Support for sites in E1 and E2 areas in the Local Plan Policy map including DVTA North and South. Proximity of land for attraction of business investment next to airports is good practice in the North. Flexibility of use classes is preferred by investors and make sites more attractive.	Points above noted for DTVA sites.	No change recommended
Canon Chris Beales				DBDLP351		Promoting New and Retaining Employment Opportunities	Support	Consider as well Modular Housing factory as a way to create Skilled local jobs and increase sustainable housebuilding.	Noted as an idea and such a use could be supported within a number of sites proposed for allocation.	No change recommended
Mr Mike Allum	Durham County Council			DBDLP1053		Promoting New and Retaining Employment Opportunities	Support	Support of inclusion in the section of cross boundary Sites in School Aycliffe and Heighinton Lane (Merchant Park)	Support noted	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP220	7.1.8	Paragraph	Object	Questions the number of 7000 jobs for Darlington by 2036 and concern that most low paid jobs will not be able to support housing numbers in Darlington but commuting.	The 7000 jobs figure is based on TVCA ambition and employment need identified / Figures will have to be monitored and updated based on available evidence.	No change recommended

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Mrs C Everington				DBDLP 542	7.1.8	Paragraph	Object	7000 jobs not achievable due to the loss of employment numbers in the Town Centre by retailers.	7000 jobs not related to retail growth, other sectors will drive employment growth forward as identified in the recent demand study.	No change recommended
	Hellens Land	mr Baker		DBDLP 803	7.1.8	Paragraph	Support	Support of employment space for future growth sectors. Greater Faverdale identified as a key employment site supported in the plan.	Support for further economic growth	No change recommended
Mr Neil Minto				DBDLP 812	7.1.8	Paragraph	Object	Questions if 7000 jobs are permanent or in construction. No monitoring of job outputs	7000 jobs will be Full Time jobs and monitoring based on Planning, Business Rates and Funding Application which are taking place through DBC and TVCA sources. Monitoring in the AMR report for planning though will not take place as Job Creation is not a target for this report. The revised and updated Darlington Economic Strategy based on the TVCA Local Industrial Strategy might be a way of monitoring job growth.	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 663	Policy E 1	Safeguarding Existing Employment Opportunities	Support	Support of Site 361 DTVA North Should be for Airport and Airport related uses only.	All of the mentioned uses in the table are on site / the uses in box are not prioritised	No change recommended
Charles Johnson	Conservative Group			DBDLP 461	Policy E 1	Safeguarding Existing Employment Opportunities	Support	Current sites must be retained and reserved	Comment noted	No change recommended
Chris McGough	Director McGough Planning Consultants Limited			DBDLP 806	Policy E 1	Safeguarding Existing Employment Opportunities	Object	Hansteen land should be excluded from 343 in E1 due to envisaged retail purposes	Commercial use can be included in E1 as in several other E1 areas (357 / 353 / 346 etc)	No change recommended
Stockton-on-Tees Borough Council	Stockton-on-Tees Borough Council			DBDLP 729	Policy E 1	Safeguarding Existing Employment Opportunities	Support	A DTVA Common Ground Statement has been produced by DBSC and SBC which recognises employment	Support noted.	No change recommended

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								allocations in line with applications and the Airport masterplan. DTVA employment sites are a strategic cross boundary issues.		
Paul Hunt	Persimmon Homes			DBDLP 1197	Policy E 1	Safeguarding Existing Employment Opportunities	Neutral	Persimmon Homes does not support the current wording of this policy, as it does not allow for flexibility of the land use towards residential of the sites identified. Reviews of the sites should take place	The Land use prospects of employment sites is reviewed through the HELAA process which takes NPFF Para 22 into account and will ensure long term protection. DBC has shown flexibility where possible in relation to employment sites being used for residential.	No change recommended
Charles Johnson	Conservative Group			DBDLP 133	Table 7.2		Neutral	Council should receive annual update on table 7.2	Should be part of enhanced monitoring and included in the Annual Monitoring Report which will include uptake of land on employment sites .	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 221	Table 7.2		Neutral	Doubt of 7000 job creation over Plan Period	Figure based on evidence and ambition of the Tees Valley and the Borough	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 665	Policy E 2	Promotion of New Employment Opportunities	Object	CPRE objects to Site 185 being included in E2 (majority of site has been included in 1997 Local Plan as Faverdale reserve Policy EP8 (Not a newly allocated Site) If the site has an allocation it should be for Employment only	The site was allocated in 1997 Plan but this time the North Eastern Site is an extension to the allocation and the site is now proposed as a mixed use strategic site with 70ha Gross for employment.	No change recommended
Charles Johnson	Conservative Group			DBDLP 462	Policy E 2	Promotion of New Employment Opportunities	Neutral	Employment sites must be reserved.	Comment noted	No change recommended
Stockton-on-Tees Borough Council	Stockton-on-Tees Borough Council			DBDLP 730	Policy E 2	Promotion of New Employment Opportunities	Support	A DTVA Common Ground Statement has been produced by DBC and SBC which recognises employment allocations in line with applications and the then produced Airport masterplan by Peel Holding. DTVA employment sites are a strategic cross boundary issues which is	The Airport now in ownership of the Mayor and TVCA is a key cross boundary development site for employment and growth. The ambitions for included sites in the plans might change due to involvement of TVCA in running the airport and a new management company. Available sites within Darlington Borough council very small on the North Site. The South	No change recommended

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								recognised by both local plans in Stockton and Darlington.	Site is depending on Progress on the Stockton side and plans of the Mayor an TVCA. However, currently it is felt that activity on the Darlington South site is most likely to happen outside of plan period after 2036.	
Mr Christopher Bell	Highways England			DBDLP928	Policy E 2	Promotion of New Employment Opportunities	Object	Central Park South 368 a possible concern for HE	Will be dealt with through traffic plans and impact assessment for individual application plots on site	No change recommended
Mr Christopher Bell	Highways England			DBDLP929	Policy E 2	Promotion of New Employment Opportunities	Object	Site 80 East of Lingfield Point HE considers site as a concern due to proximity to the B6279/A66 junction. Trip generation and impact need to be confirmed for any proposal.	The council is working with Highways England to model and accurately understand the impact and necessary mitigation measures required for allocations proposed within the local plan. A statement of common ground is being prepared with Highways England to accompany the publication draft of the plan.	No change recommended
Mr Christopher Bell	Highways England			DBDLP930	Policy E 2	Promotion of New Employment Opportunities	Object	Site 356- Ingenium Parc concern for HE	The council is working with Highways England to model and accurately understand the impact and necessary mitigation measures required for allocations proposed within the local plan. A statement of common ground is being prepared with Highways England to accompany the publication draft of the plan.	No change recommended
Mr Christopher Bell	Highways England			DBDLP931	Policy E 2	Promotion of New Employment Opportunities	Object	Site 360 Heighington Lane North a **possible concern** for HE. Due to proximity to junction 59 of the A1(M) Trip generation and impact need to be confirmed for any proposal.	The council is working with Highways England to model and accurately understand the impact and necessary mitigation measures required for allocations proposed within the local plan. A statement of common ground is being prepared with Highways England to accompany the publication draft of the plan.	No change recommended.
	Hellens Land	mr Baker		DBDLP802	Policy E 2	Promotion of New	Support	Support for 200,000 sqm of employment space in Greater Faverdale. Locational factors for the	Support noted	No change recommended

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						Employment Opportunities		site are outlined and the benefits for mixed use including residential.		
Mr Christopher Bell	Highways England			DBDLP934	Policy E 2	Promotion of New Employment Opportunities	Neutral	Site 351- South West TCF/Beaumont Street is **no concern** for HE	Comments noted	No change recommended
Mr Christopher Bell	Highways England			DBDLP932	Policy E 2	Promotion of New Employment Opportunities	Object	Site 362 DTVA Airport South is concern for HE due to closeness to the B6280/A66/A67 junction. Likely trip generation and distribution of development trips would have to be confirmed with planning application process.	The council is working with Highways England to model and accurately understand the impact and necessary mitigation measures required for allocations proposed within the local plan. A statement of common ground is being prepared with Highways England to accompany the publication draft of the plan.	No change recommended
Mr Christopher Bell	Highways England			DBDLP933	Policy E 2	Promotion of New Employment Opportunities	Object	Site 367 Link 66 has been reviewed by CH2M HE considers site a concern as immediately adjacent to the A66 at the B6279/A66 junction. Likely trip generation and distribution of development trips would have to be confirmed.	The council is working with Highways England to model and accurately understand the impact and necessary mitigation measures required for allocations proposed within the local plan. A statement of common ground is being prepared with Highways England to accompany the publication draft of the plan.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP1144	Policy E 2	Promotion of New Employment Opportunities	Object	No robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for Employment Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of	A Heritage Impact assessment will be undertaken for all sites prior to the next stage of the Plan.	No change recommended

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								whether or not the principle of development and loss of any open space is acceptable.		
Ms Emily Hrycan	Historic England			DBDLP 1146	Policy E 2	Promotion of New Employment Opportunities	Object	Site 146 is adjacent to Grade II* heritage assets, Kerbstones, Cummins Engine Factory and Security Fence at Cummins Engine Factory and there is the potential for harm to the setting of these assets. Therefore, before allocating the site there will need to be some evaluation of the impact the development of the site might have upon those elements that contribute to the significance of the heritage assets including their setting.	A Heritage Impact assessment will be undertaken for all sites prior to the next stage of the Plan.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP 1147	Policy E 2	Promotion of New Employment Opportunities	Object	Site 362 – DTVA Airport South The site is adjacent to Grade II heritage asset and there is the potential for harm to the setting of this asset. Therefore, before allocating the site there will need to be some evaluation of the impact the development of the site might have upon those elements that contribute to the significance of the heritage assets including their setting.	A Heritage Impact assessment will be undertaken for all sites prior to the next stage of the Plan	No change recommended
Ms Emily Hrycan	Historic England			DBDLP 1148	Policy E 2	Promotion of New Employment Opportunities	Object	Site 351 – South West Town Centre Fringe / Beaumont Street is close to Grade 2 listed building in Houndgate and Town Centre Conservation area. Before allocating the site there will need to be some evaluation of the impact the development of the site might have upon those elements that contribute to the significance of the heritage assets including their setting.	A Heritage Impact assessment will be undertaken for all sites prior to the next stage of the Plan.	No change recommended

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								This assessment should be included as part of a heritage impact assessment undertaken for all sites prior to the next stage of the Plan.		
Anna Bensky	DTVA	Mr Peter Rowe	Turley	DBDLP 1214	Policy E 2	Promotion of New Employment Opportunities	Object	Modify the policy text to identify flexibility to accommodate employment generating beyond B1 B2 B8 Widen the uses at DTVAs Sites 362	Table 7.3 and 7.4 show possible site specific uses as required by MHCLG which includes airport specific and related uses for Sites 361 and 362. The takeover of the airport by the TV major and TVCA in 2019 might specify in future which uses could replace the revised Masterplan presented by Peel Ltd in 2014 which included residential which will not be part of the Submission Local Plan any more. Flexibility in uses is provided against the specific site characteristics in Tables 7.3 and 7.4.	No change recommended
Charles Johnson	Conservative Group			DBDLP 134	Table 7.3		Neutral	Table 7.3 should be updated annually for Council	Should be part of enhanced monitoring and included in the Annual Monitoring Report which will include uptake of land on employment sites	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 222	Table 7.3		Neutral	Not convinced about 7000 fte jobs creation in Darlington	As part of evidence and ambition	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 223	Table 7.4		Neutral	Not convinced about 7000 fte jobs creation in Darlington	Target based on evidence and ambition	No change recommended
Mr Gary Swarbrick	Associate ELG Planning for Fintry Estate			DBDLP 1075	Table 7.4		Neutral	Site 80 should be subject to a stand alone allocation for Mixed Use Development ▪ B1, B2 & B8 Uses; ▪ Bulky Goods Retailing (Use Class A1); ▪ Neighbourhood Centre Uses, including convenience foodstore; local shops,	Not seen as mixed use development as residential not suitable. Retail and Neighbourhood uses could be considered as with Town Centre first and retail policy and impact assessment requirement. Similar uses are foreseen on neighbouring Site 367 Link 66	No change recommended

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								services and community facilities; and drive thru' restaurants / coffee outlets to meet the day-to-day needs of existing and future residents, employees and passing motorists in this part of the town.	Symmetry Park in line with valid outline Planning permission. No need to change to Mixed Use	
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 668	7.1.11	Paragraph	Neutral	Question which two new sites have been allocated.	As in table 7.3 Central park South and parts of Greater Faverdale	No change recommended
Charles Johnson	Conservative Group			DBDLP 132	Policy E 3	Darlington Farmers Auction Mart Relocation	Neutral	Delay of DFAM relocation	Program back on track after announcement of DFAM in Sept 18	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 671	Policy E 3	Darlington Farmers Auction Mart Relocation	Support	CPRE supports the relocation based on planning permission and small scale on Auction Mart activities.	Support noted	No change recommended
Mr Mike Allum	Durham County Council			DBDLP 1052	Policy E 3	Darlington Farmers Auction Mart Relocation	Support	DFAM relocation to Humbleton Farm supported on basis on benefits to neighbouring rural counties. Discussions on cross boundary implications welcome	Support noted	No change recommended
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP 382	Policy E 4	Economic Development in the Open Countryside	Support	Proposed policy for enhancing and diversifying the rural community through economic development activities supported	Support noted	No change recommended
Charles Johnson	Conservative Group			DBDLP 135	Policy E 4	Economic Development in the Open Countryside	Object	Policy needs to be more robust in relation to future change of use and holiday homes becoming permanent residences	Policies will apply for tourist accommodation / second homes not an issue in Darlington and change of use needs planning permission	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) -			DBDLP 672	Policy E 4	Economic Development in the Open Countryside	Support	CPRE supports the policy E4 as long as the council enforces para 7.2.8. Submission of evidence for need of residential accommodation.	Support noted	No change recommended

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	Darlington Group									
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1118	Policy E 4	Economic Development in the Open Countryside	Object	We regard the approach in Policy E4 to be overly restrictive and inflexible in nature. As a result of this, we object to the policy and believe it to be unsound on the basis of not being positively prepared, justified or consistent with national policy. A more logical and therefore sound approach is to assess such development on a site by site basis depending on specific circumstances. It follows that if economic development beyond settlement boundaries can be proven to be sustainable, then the NPPF would indicate that such development should be approved. As such, to make Policy E4 sound, it needs to be amended on this basis.	Very narrow interpretation of NPPF Look at site by site basis assessment of value of development on specific circumstances / If economic development beyond settlement boundaries is to be proven to be sustainable, then the NPPF could be interpreted that development could be approved. Interpretation based at application stage.	No change recommended
Kieron Warren				DBDLP 286	8	TOWN CENTRE AND RETAIL	Neutral	Suggestions to increase vitality of the Town Centre (Neutral) 30 min free parking anywhere Shops (business space)for local business first	Suggestions noted but parking charges and business rates are not planning matters.	No change recommended
Ken Walton				DBDLP 338	8	TOWN CENTRE AND RETAIL	Neutral	Suggestions for vitality retention of Town Centre including Rent / Rates reductions and cheap or free parking.	Suggestions are not Planning related but are matters that will be considered and in the update of the Town Centre Action plan by the Council and partners. Reductions in parking charges for council car parks have also recently been announced.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 895	8	TOWN CENTRE AND RETAIL	Object	Strategic Road Network Impact concern for Site 271 Commercial Street Kendrew Street	The council is working with Highways England to model and accurately understand the impact and necessary mitigation measures required for allocations proposed within the local plan. A statement of common ground is being prepared	No change recommended

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									with Highways England to accompany the publication draft of the plan.	
Mr Mike Allum	Durham County Council			DBDLP 1054	8	TOWN CENTRE AND RETAIL	Support	Darlington Town Centre and Market Town recognition as sub-regional centre outside Darlington's borders.	Support noted.	No change recommended
Patricia Newton				DBDLP 500		Darlington Town Centre	Object	Loss of shops and vitality of town centre and displacement of disposable income to other Towns	The council recognised the importance of the town Centre by setting up a new revitalised Town Centre Reference Group and appropriating funding to key elements with own money and TVCA Funds. A bid to the £675m national Future High Street has been prepared for March 2019 - Results are to be announced later in 2019.	No change recommended
Mrs H Kieran				DBDLP 718		Darlington Town Centre	Object	Inner Darlington residential and TC would be neglected through regeneration and new housing. Closure of shops and amenities in Town Centre of concern as loosing appeal	The council recognised the importance of the town Centre by setting up a new revitalsed Town Centre reference Group and appropriating funding to key elements with own money and TVCA Funds. A bid has been prepared to the £675m national Future High Street for March 2019. Results are to be announced.	No change recommended
Mr Steven Drabik	Architectural Liaison Officer Durham Constabulary			DBDLP 1095		Darlington Town Centre	Neutral	Licensed premises not the saviour of the Town Centre and are in fact attracting crime and disorder. Based on revised NPPF 2018 recognises this in paragraph 95(a). 1. Licensed premises could also conflict with other town centre regeneration schemes such as the conversion of vacant buildings for residential purposes.	Noted and NPPF para 95a a valid addition and taking forward in the Councils Anti-Social Behaviour Crackdown Plan which contains the whole extend of the Planning Town Centre boundary. Durham Constabulary would welcome the opportunity to help formulate a policy on licensed premises with the LA	No change recommended

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Mr David Reed				DBDLP1000		Darlington Town Centre	Object	Bus Station required and traffic modes on roads not co-ordinated / has a location in mind but does not name it.	There is a strong desire from bus users for bus stops to be accessible as close as possible to shopping areas, to facilitate this, buses have been incorporated into the town's road network like many other towns and cities in the Country. If a bus station were constructed then buses would not operate through the town centre.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP224	8.1.1	Paragraph	Neutral	Suggestion of more residential in Primary Shopping Area	Increased residential use is one of the key recommendations of the plan for town centre.	No change recommended
Mrs Lisa Bramfitt				DBDLP558	8.1.1	Paragraph	Support	Support for of policy living space in Town Centre above retail outlets	Support noted	No change recommended
Miss Madeleine Sinclair				DBDLP389	8.1.3	Paragraph	Support	Support of retail and leisure focus of TC Observation that M+S is allowed moving to the Edge of Town while closing TC shop with convenience element	Support noted	No change recommended
Charles Johnson	Conservative Group			DBDLP136	Policy TC 1	Darlington - Town Centre Boundary	Object	Town Centre retailing and analysis needs to be taking into account for boundary	Evidence and analysis has been carried out to define boundary	No change recommended
Mr Paul Howell				DBDLP320	Policy TC 1	Darlington - Town Centre Boundary	Neutral	Should include other non-retail uses for primary shopping Area like residential	Residential uses not the focus of the primary Shopping Area boundary but their consideration is welcome on upper floors.	No change recommended
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP681	Policy TC 1	Darlington - Town Centre Boundary	Neutral	Edge of Centre could be more defined spatially, consider perhaps in shape of Design SPD Zone 1.	SPD Zone one would include areas outside of the Inner ring Road while for design use the assumptions are fine for the Planning approach in particular for retail and Town Centre Vitality the area would be too wide.	No change recommended

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Mr Peter Eckels				DBDLP723	Policy TC 1	Darlington - Town Centre Boundary	Object	The local plan is not current as suggestions that the town centre has to shrink and include residential opportunities	The Plan has shrunk the Town Centre and primary Shopping Area including the omission of secondary and primary shopping areas / The integration of residential use above retail and in the Town Centre is in particular supported in the Plan.	No change recommended
Charles Johnson	Conservative Group			DBDLP137	Policy TC 2	Primary Shopping Area	Neutral	Primary Shopping area needs to reflect current retail trends	Primary Shopping area based on evidence and retail trend	No change recommended
Canon Chris Beales				DBDLP352	Policy TC 2	Primary Shopping Area	Support	Positive to support residential uses within primary Shopping Area to sustain the shopping centres in the poor national climate for TC retail.	Support noted	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP678	Policy TC 2	Primary Shopping Area	Object	Non retail usages in Primary Shopping area not supported by CPRE	There are always be Non retail Usages in Primary Shopping Areas (Banks / Post Office / Leisure / Licensed Establishments)	No change recommended
Tom Clarke	National Planning Adviser Theatres Trust			DBDLP817	Policy TC 2	Primary Shopping Area	Neutral	Supportive of policies would like to see greater flexibility for temporary permissions and pop up shops in vacant units.	Flexibility of use is supported and temporary use is more related to the letting approach of resident landlords then planning issues.	No change recommended
Mr Paul Howell				DBDLP321	8.1.8	Paragraph	Object	Forecast for Town Centre growth is minimal - Kendrew Commercial Street area should adopt a different vision than expansion of retail	The expansion area for Town Centre uses within the plan is crucial to enable the sequential test to be applied. The Town Centre First Policy is reliant on having adequate developable sites available within or at the Edge of the Town Centre to challenge out of town retail parks which are still promoted by some developers.	No change recommended
Charles Johnson	Conservative Group			DBDLP138	Policy TC 3	Additional Site for Town Centre Uses	Object	More robust integration of old buildings to be applied for this site to retain character	Would be done with any development proposal for the site	No change recommended
Mr Christopher Bell	Highways England			DBDLP935	Policy TC 3	Additional Site for Town Centre Uses	Neutral	Quoting Policy on T3 and deemed excellent from a transport connectivity point. No concern of site from Highways England.	Support noted	No change recommended

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Ms Emily Hrycan	Historic England			DBDLP 1150	Policy TC 3	Additional Site for Town Centre Uses	Object	Consider Impact of potential development on adjacent historic environment on Commercial and Kendrew Street. (Northgate Conservation Area) Heritage Impact Assessment needed to be mentioned in SA and Plan to include site specific mitigation.	Valid Points in relation to need for Heritage Assessment but only if change is going to be proposed as part of a Planning Application.	No change recommended
Miss Madeleine Sutcliffe				DBDLP 391	8.1.11	Paragraph	Object	Enough retail space available already in existing Primary Shopping Area / Enhancements their could fulfil the role	In current retail trend terms this would be correct however the 20 year lifetime of the plan based on Retail Strategy 2017 looks for potential extension area with the Town Centre. The extension site is also the argument used for the Town Centre First Policy which would make developers apply the sequential test set out in Policy TC 5.	No change recommended
Mr Ross Chisholm	Planning Issues Contact Campaign for Real Ale Darlington Branch / Friends of Stockton and Darlington Railway			DBDLP 307	Policy TC 4	District and Local Centres	Object	Omission of other Local District and Local Centres - only two in the plan without explanation and justification. Should be an evenly distributed in the Borough. Some were planned as local Centre for expanding communities (West Park and Whinfield), Camra happy to assist with setting appropriate Boundaries	TC 4 is a reduction of Local and District Centres from the last draft Plan and could be considered. Last plan including intermediate Planning Statement had more Centres mentioned. But the approach of the new Local Plan sets to only retain and safeguard Centres in Cockerton and Mowden due to their characteristic and safeguarding purpose.	No change recommended
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 688	Policy TC 4	District and Local Centres	Object	Object: other centres needed - local shopping opportunities and drive mixed-use development into these areas to support HNT Design principles and concepts (should be shown) Examples from Stockton plan SD4 and EG3	A valid point that other local shopping centres could be considered. But the approach of the new Local Plan sets to only retain and safeguard Centres in Cockerton and Mowden due to their characteristic and safeguarding purpose. Otherwise for all other areas within the council the Town Centre First Town policy applies and	No change recommended

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									a 500sqm local retail impact assessment threshhold will be required.	
ASDA Stores Limited		Katherine Sneeden		DBDLP 779	Policy TC 4	District and Local Centres	Object	Omission of Whinfield and Neasham Road local centres from the retail hierarchy (as in Table 8.1) Only 2 remaining in TC4	NPPF 2018 does not re-enforce Local and District Centres The approach of the new Local Plan sets to only retain and safeguard Centres in Cockerton and Mowden due to their characteristic and safeguarding purpose.	No change recommended
Mr Steven Drabik	Architectural Liaison Officer Durham Constabulary			DBDLP 1097	Policy TC 4	District and Local Centres	Object	Inclusion of Policy for Takeaways A5 Issues of crime and disorder in all Centres not only based on A5 establishments more likely to follow density of licensed premises	What are the key issues though of A5? (can that not be achieved with licensing) Issues of crime and disorder apply to Local and District Centres as well. (Would that be a Design Chapter issue)	No change recommended
Gillian Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 683	Policy TC 5	Retail Impact Assessment Threshold	Object	Local threshold of 500sqm is too high	Based on evidence and local knowledge 500sqm is a valid size to apply for retail impact threshold.	No change recommended
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP 383	Policy TC 6	Darlington - Town Centre Fringe	Support	Preference for brownfield site use for key regeneration sites like the TC Fringe / improve viability of such sites for developers through financial support and grants	Support noted	No change recommended
Charles Johnson	Conservative Group			DBDLP 139	Policy TC 6	Darlington - Town Centre Fringe	Support	Preferred use in TC of brownfield sites	All sites in TC Fringe are brownfield	No change recommended
Miss Madeleine Sutcliffe				DBDLP 392	Policy TC 6	Darlington - Town Centre Fringe	Object	With High density / low cost housing Council would create gentrification of the Town Centre Fringe Mixed use preferred	Mixed use with higher densities and affordable mixed products is preferred for the Town Centre Fringe due to its exceptional transport offer. Land in TCF currently underutilised	No change recommended

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Dr Ellen Bekker	Lead Adviser Natural England			DBDLP303	9	ENVIRONMENT	Object	The Plan does not safeguard the long-term capability of the best and most versatile agricultural land (BMV land). It should be clear that areas of lower quality agricultural land should be used for development in preference to BMV land, in line with NPPF paragraph 112. The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible.	When assessing potential development sites through the Sustainability Appraisal process, consideration has been given to the quality of agricultural land. In selecting allocation sites, the Council has sought to use areas of poorer quality land in preference to that of a higher quality. The revised NPPF changes the policy with regards to BMV agricultural land, stating that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other measures, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land.	No change recommended.
Ian Wilton				DBDLP339	9	ENVIRONMENT	Object	Our historic environment and associated history, heritage and natural world should be encouraged to thrive not be reduced or destroyed especially in our country parks.	Noted. Protecting and enhancing the countryside and the natural environment is one of the overarching aims of the Darlington Local Plan. The planning policies in the Environment section of the Local Plan seek to achieve this aim through specific policies designed to protect the Borough's historic environment, green spaces and biodiversity.	No change recommended.
MRS Angela Rajf-Green				DBDLP440	9	ENVIRONMENT	Support	Blackwell Grange should be protected in the plan. It is an historic landscape forming a beautiful entrance to the town. It is values for the physical and mental health of the community. It joins the Green Wedge on the south and west of the town.	Please see officer response on Site 9 Blackwell Grange East.	No change recommended.
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP689	9	ENVIRONMENT	Neutral	Some reference could be included regarding landmarks and the importance of these for legibility in dementia friendly environments.	Draft Policy DC 2: Health and Wellbeing states that developments will be supported that integrate dementia friendly design principles, including landmark features.	No change recommended.

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Mr Mike Allum	Durham County Council			DBDLP1055	9	ENVIRONMENT	Neutral	With the exception of the Darlington and Stockton Railway policy (addressed below), none of these policies raise issues of strategic or local importance with County Durham. We welcome the opportunity to continue to work jointly with Darlington BC on cross-boundary projects such as the Brightwater project and Heritage Action Zone and encourage continued partnership working in this regard.	Comment noted.	No change recommended.
Ms Emily Hrycan	Historic England			DBDLP1160	9.1.1	Paragraph	Support	Para 9.1.1. to 9.1.11 - Historic England welcomes the content of these paragraphs which give an overview of Darlington.	Support noted.	No change recommended.
Mr Be... Lamb	manager Tees Rivers Trust			DBDLP29	9.1.3	Paragraph	Neutral	The town was built around the river Skerne - surely this warrants it's recognition as a heritage asset?	Comment noted. The River Skerne is not currently designated as a heritage asset but is clearly important to the setting of heritage assets along its route. The River is also afforded protection as an important element of blue infrastructure in the Borough, and as a strategic green corridor, through Policies ENV 3, ENV 4 and ENV 7.	No change recommended.
Miss Madeleine Sutcliffe				DBDLP393	9.1.5	Paragraph	Neutral	I don't think that one could describe Darlington as 'the best market town....' anywhere at present. The outdoor market on Mondays and Saturdays is probably the worst and tackiest in the country, with a lack of interesting/intriguing stalls, and an increasing number of 'vaping' products. The vinyl stall is the only one worth visiting - also fruit & veg. stall on Mondays. Again, market stalls should sell products not readily available in the local shops.	The reference to Darlington being described as the best market town in the bishopric outside of Durham relates to the 1530s. Town centres around the country are facing a number of challenges such as the growth of online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. The level of growth around the town proposed in the Draft Local Plan, will generate increased expenditure in the town centre that will help to support local employment and the vitality and viability of the centre.	No change recommended.
Mr				DBDLP815	9.1.5	Paragraph	Object	The town was flourishing until the Council allowed out of town retail	Town centres around the country are facing a number of challenges such as the growth of	No change recommended.

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Neil Minto								development. We had a market in its correct place, the market place, and it was thriving. Now everything is a stop gap attempt to keep some people coming into the town centre. With large places such as Binns and M&S closing, there is going to be no reason to come into the town centre.	online shopping, pressure from out of centre retailing and supermarkets, and reduced town centre footfall. However, the nature of town centres are changing and adapting to these pressures becoming more of a mixed shopping and leisure destination, with an increase in other land uses including residential and office use increasing activity in centres throughout the day. Allocations for housing and employment growth around the town will generate increased expenditure in the town centre that will help to support local employment and the vitality and viability of the centre.	
Mr Ross Chisholm	Planning Officer Friends of the |Stockton and Darlington Railway			DBDLP 572	9.1.6	Paragraph	Neutral	The S&DR is also of **international** significance.	Comment noted.	No change recommended.
Mr Ben Lamb	manager Tees Rivers Trust			DBDLP 30	9.1.10	Paragraph	Support	It is good to see that access to and enjoyment of the river is included.	Support noted.	No change recommended.
MR MICHAEL GREEN				DBDLP 499	9.1.11	Paragraph	Support	Borough's rural historic environment and the heritage assets integral to it (including Blackwell Parkland) should be protected, enhanced and promoted. Full comment provides information on historical references to the Blackwell area of Darlington.	Support noted.	No change recommended.
Charles Johnson	Conservative Group			DBDLP 142	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Support	Pleased to see a robust policy on this matter. This policy must be fully implemented and not circumventing by commercial need.	Support noted.	No change recommended.
Mr Simon	Member Barmpton and Skerningham	Mr Simon	Member Barmpton and Skerningham	DBDLP 412	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's	Support	This is sound policy but it should be strictly implemented.	Support noted.	No change recommended.

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Bainbridge	Preservation Group	Bainbridge	Preservation Group			Historic Environment				
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 685	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Neutral	In the series of criteria relating to demolition of buildings in a conservation area, it is not clear whether the intent is 1. "and" i.e. requiring all criteria to be met 2. "or" i.e. requiring any one of the criteria to be met CPRE would favour the latter. Precision in language is essential.	The wording of Policy ENV 1 A) criteria v-vii relating to the demolition of buildings or structures in a conservation area is clear that an applicant would be required to satisfy all of the criteria.	No change recommended.
Mr Ross Crosholm	Planning Officer Friends of the |Stockton and Darlington Railway			DBDLP 573	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Support	The FSDR welcome proposed policy ENV 1 Protecting, Enhancing and Promoting Darlington's Historic Environment. It will be the job of the Plan to ensure that the planning system serves the aims and objectives of the Rail Heritage Board and facilitates the proposals of the Programme and Delivery Plan of the Heritage Action Zone.	Support noted.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1345	Policy ENV 1	Protecting, Enhancing and Promoting Darlington's Historic Environment	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.
Mr Steven Drabik	Architectural Liaison Officer Durham Constabulary			DBDLP 756	9.1.12	Paragraph	Neutral	Specific mention should be made in relation to Cemeteries, there have been well documented long term issues in North Road Cemetery which are related to the relaxation of access. The Local Authorities Cemeteries Order 1977 is the primary legislation for their protection.	Access arrangements to cemeteries is not something that can be controlled by the Local Plan.	No change recommended.

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Charles Johnson	Conservative Group			DBDLP143	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Support	Policy should include an immediate marketing scheme in preparation for 2025.	Support noted. A marketing scheme is not something that can dealt with by the Local Plan.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP686	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Support	CPRE supports Policy ENV2.	Support noted.	No change recommended.
Mr Ross Chisholm	Planning Officer Friends of the |Stockton and Darlington Railway			DBDLP574	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Support	The FSDR welcome proposed policy ENV 2 Stockton and Darlington Railway. It will be the job of the Plan to ensure that the planning system serves the aims and objectives of the Rail Heritage Board and facilitates the proposals of the Programme and Delivery Plan of the Heritage Action Zone. However, we feel that policy ENV 2 and the supporting text need to be strengthened in order that it will stand up to close examination at inquiry and appeal and also to make sure that new development proposals on or near the line make appropriate contributions to its protection, enhancement and promotion. We therefore suggest; 1 'and enhance' be inserted after 'preserve' in the first sentence of the policy. 2 The supporting text should explain that the policy does not apply just to those assets relating to the railway on the day it opened. The railway immediately started to evolve, operationally, mechanically, physically and geographically, and those assets that remain on the 1825 line and which	Support noted.	No change recommended.

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								are significant to its heritage, public understanding and enjoyment should be protected and enhanced in relation to their significance. 3 The supporting text should make it clear that some S&DR assets are not located on or adjacent to the route of the line itself, and that the policy applies to them also. 4 The policy should name the Darlington Branch to Westbrook and Croft Branch and show them on the policies map. This would achieve consistency with the Local Plans for Stockton and County Durham, which name the Yarm, Haggerleases and Black Boy Branches. The Darlington Branch is fully documented in the Historic Environment Audit and a survey of the Croft Branch is proposed in the HAZ Programme and Delivery Plan.		
Mr A Macnab	Middleton St George Parish Council			DBDLP827	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Support	The Parish Council would like to see the conservation of the former S&D Railway, and all the heritage artifacts, and therefore agree with and support the representation by the Friends of Stockton and Darlington Railway (FSDR) as follows: • the routes of the proposed Heritage Trail for pedestrians and cyclists should be shown (and improvements are needed in places between St George's Way and the borough boundary); • FSDR will be proposing the creation of a Rail Heritage Hub at Fighting Cocks;	The focus of Policy ENV 2 is the protection of the route of the Stockton & Darlington Railway, and its brachlines, and the preservation of historic remains along the route. The Heritage Action Zone initiative will be able to build on this groundwork to develop specific projects for the line.	No change recommended.

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								• funding for the above will be found from various sources including the S&DR Heritage Action Zone, and contributions from developers would be appropriate as the enhanced trackbed will be enjoyed by residents.		
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1346	Policy ENV 2	Stockton and Darlington Railway (S&DR)	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 414	9.3.1	Paragraph	Object	It is difficult to see how the Skerningham Strategic Allocation can be justified having regard to the following statement in policy ENV 3 "… valued landscapes should be protected and enhanced". DBC is holding itself out as a protector of "valued landscapes" in its Green Infrastructure Strategy and support of The Bight Water Landscape Partnership but the proposed Skerningham Strategic Allocation in the Draft Local Plan would suggest otherwise.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 416	9.3.2	Paragraph	Object	Whinfield, Harrogate Hill, Beaumont Hill, Barmpton, Great Burdon would all lose their unique identity and open space between neighbourhoods and the identity of their communities by the inclusion of the Skerningham Strategic Allocation which would effectively join all these settlements together.	Please see officer response on the Skerningham Strategic Allocation. Policy ENV 3 A)1. states that the rural gaps between Darlington and the villages of Great Burdon and Barmpton will be retained. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements	No change recommended.

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									were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningham site, no further encroachment of development towards these rural settlements will be allowed.	
Mr Simeon Hope				DBDLP250	Policy ENV 3	Local Landscape Character	Neutral	These are fine words. As a resident of Whinfield, I object to the Strategic Allocation because it would involve the substantial destruction of the "openness and green infrastructure functions... between Darlington and the villages of Great Burdon and Barmpton". What is the point of Policy ENV 3 if, when money is involved, it is ignored?	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Alan Hutchinson	Whinfield Residents Association			DBDLP167	Policy ENV 3	Local Landscape Character	Object	Re. point A, “Retaining the openness and green infrastructure functions of…….between Darlington and the villages of Great Burdon and Barmpton”, this is contradicted by the proposals for the Skerningham Strategic Allocation, which involve development in these areas.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP385	Policy ENV 3	Local Landscape Character	Support	NPC considers that the location-specific policies in paragraphs A) - C) detracts from the importance of D). NPC suggests that para D) should give more specific guidance on both protection and enhancement, linked to the visionary aim of "cherishing,	Policy ENV 3 applies equal weight to each of the criteria it contains.	No change recommended.

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								protecting and celebrating" Darlington's "natural and historic environment".		
Charles Johnson	Conservative Group			DBDLP 144	Policy ENV 3	Local Landscape Character	Object	There is a contradiction in wording, how do you retain the rural gaps and at the same time accept development. Any development compromises the gaps.	A gap between settlements that retains the openness and green infrastructure functions of the space can still be maintained despite a closing of the gap as a result of development. Decisions made under this policy will need to be considered on a case by case basis dependent on the specifics of the development proposed and its effect on the openness and function of the space involved. The Local Plan should be read as a whole. The inclusion of some villages in the list of rural gaps to be maintained is in some cases a reaction to the allocations made in the plan (i.e. Barmpton and Great Burdon). Their inclusion will ensure that, following the completion of development on allocated sites, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP 264	Policy ENV 3	Local Landscape Character	Object	It is noted that a number of locations are listed to 'retain the openness and green infrastructure functions' The locations listed do not include any of the country side or 'green wedges between any of the villages in the Heighington and Coniscliffe Ward – why?	Low Coniscliffe was not identified under criterion A)1. of Policy ENV 3 due to the planning permission granted on land to the North East of the village (application reference 16/01231/FUL) between the village and the proposed development limit of Darlington, and taking into account the South Coniscliffe Park allocation site (site ref. 41). However, the status of Low Coniscliffe as a rural village distinct from Darlington town has not changed in the Local Plan, as recognised by the settlement hierarchy set out in the plan and by the extent of the settlements development limit. Should planning permission for this site lapse in the future, the Council would be able to reconsider whether to include Low Coniscliffe under Policy ENV 3 criterion A)1. when reviewing the Local Plan. High Coniscliffe and Heighington are separated from Darlington town by the A1(M) corridor, a significant physical and visual barrier, with Heighington located over 5 kilometres from the town and 1.5 kilometres from Newton Aycliffe.	No change recommended.

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									It was therefore not considered necessary to include these settlements under Policy ENV 3 criterion A)1.	
Mr John Rudkin				DBDLP293	Policy ENV 3	Local Landscape Character	Object	I object to the Skerningham Strategic allocation because it contradicts Policy ENV3 as openness and green infrastructure will not be retained between Darlington, Great Burdon and Whinfield.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the village of Great Burdon, maintaining its separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed. Whinfield is already part of the main built up area of the town.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP417	Policy ENV 3	Local Landscape Character	Object	We support the policy but much of it is in direct conflict with the Skerningham Strategic Allocation and it is difficult to see how the Skerningham Strategic Allocation can be justified having regard to the fact that the area is promoted by DBC under the Green Infrastructure Strategy. Re. point A, *"Retaining the openness and green infrastructure functions of…….between Darlington and the villages of Great Burdon and Barmpton",* this is contradicted by the proposals for the Skerningham Strategic Allocation, which involve development in these areas.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Mr Colin Raine				DBDLP634	Policy ENV 3	Local Landscape Character	Neutral	Whilst I do support the principles of the Local Landscape Character, retaining openness & green infrastructure.	Comments noted. Character and local distinctiveness by its very nature has to be determined on a case by case	No change recommended.

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								The character & local distinctiveness of villages and rural area seems to cover only a very small number of sites to be protected. The term 'character & local distinctiveness' is subjective, how is this decided? Are the rural gaps between Darlington, Hurworth & Neasham of importance to retain the openness & green infrastructure of Darlington Borough? What criteria needs to be met in order to achieve 'rural gap' status? I would like to see the amount of rural gap areas increased.	basis considering the particular history and characteristics of the site and its surrounds. Hurworth and Neasham are separated from Darlington by the A66 around the southern side of the town, a significant physical and visual barrier. The villages are also both over 2 kilometres from the edge of the town. It was therefore not considered necessary to include these settlements under Policy ENV 3 criterion A)1.	
Judith Murray				DBDLP 529	Policy ENV 3	Local Landscape Character	Object	I object to the Skerningham Strategic allocation because it contradicts Policy ENV3 as openness and green infrastructure will not be retained between Darlington, Great Burdon and Whinfield.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the village of Great Burdon, maintaining its separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed. Whinfield is already part of the main built up area of the town.	No change recommended.
Mr A Macnab	Middleton St George Parish Council			DBDLP 820	Policy ENV 3	Local Landscape Character	Object	We also agree with CPRE: “CPRE feels strongly that the policy intentions expressed here and in Policy ENV3 of maintaining the distinctiveness of villages and the openness of the countryside would be best achieved by	The NPPF (paragraph 135) makes it clear that new Green Belts should only be established in exceptional circumstances. There has not been any major change in circumstances that would make the adoption of new Green Belt necessary around Darlington, and normal planning and	No change recommended.

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								creating Green Belt, a designation expressly created to meet these objectives."	development management policies (such as Policy ENV 3) are considered adequate to deal with development proposals around the borough's settlements. The Local Plan sets out a clear strategy for the borough and identifies sufficient land to accommodate the identified needs of the borough over the plan period.	
Mrs Liz Knight				DBDLP 962	Policy ENV 3	Local Landscape Character	Object	Re. point A, "Retaining the openness and green infrastructure functions of…….between Darlington and the villages of Great Burdon and Barmpton", this is contradicted by the proposals for the Skerningham Strategic Allocation, which involve development in these areas.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Mr Knight				DBDLP 967	Policy ENV 3	Local Landscape Character	Object	Re. point A, "Retaining the openness and green infrastructure functions of…….between Darlington and the villages of Great Burdon and Barmpton", this is contradicted by the proposals for the Skerningham Strategic Allocation, which involve development in these areas.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1031	Policy ENV 3	Local Landscape Character	Object	LCMPC support the principles of policy ENV 3 (local landscape character), to protect and improve the character and local distinctiveness of the villages. However, LCMPC object to the lack of reference to retaining the openness and green infrastructure functions of the rural gaps between	Low Coniscliffe was not identified under criterion A)1. of Policy ENV 3 due to the planning permission granted on land to the North East of the village (application reference 16/01231/FUL) between the village and the proposed development limit of Darlington, and taking into account the South Coniscliffe Park allocation site (site ref. 41). However, the status	No change recommended.

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								Darlington and Low Consicliffe and Merrybent. Through the preparation of the LCMNP it is clear that these matters are of significant importance to the local community.	of Low Coniscliffe as a rural village distinct from Darlington town has not changed in the Local Plan, as recognised by the settlement hierarchy set out in the plan and by the extent of the settlements development limit. Should planning permission for this site lapse in the future, the Council would be able to reconsider whether to include Low Coniscliffe under Policy ENV 3 criterion A)1 when reviewing the Local Plan. Merrybent is separated from Darlington town by the A1(M) corridor, a significant physical and visual barrier. It was therefore not considered necessary to include these settlements under Policy ENV 3 criterion A)1.	
Mr Roger Fitzpatrick-Odahamier				DBDLP995	Policy ENV 3	Local Landscape Character	Object	I object to the Skerningham Strategic allocation because it contradicts Policy ENV3 as openness and green infrastructure will not be retained between Darlington, Great Burdon and Whinfield.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the village of Great Burdon, maintaining its separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed. Whinfield is already part of the main built up area of the town.	No change recommended.
	Northumbrian Water Ltd	Miss Isobel Jackson	Senior Planner Lichfields	DBDLP861	Policy ENV 3	Local Landscape Character	Object	A policy which seeks to protect and improve local character and distinctiveness is welcomed, though it should be ensured that Policy ENV3 is not more stringent than the NPPF which (at Footnotes 9 and 6 respectively) is clear about which policies can indicate that development should be restricted. This includes	The NPPF is clear that the planning system should be genuinely plan-led, with succinct and up-to-date plans providing a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings (NPPF, para 15). Paragraph 170 of the NPPF states that planning policies should contribute to and enhance the natural and local	No change recommended.

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								habitat sites, Green Belt, Local Green Space and irreplaceable habitats. The current wording of ENV3 seeks to impose a level of protection which is overly restrictive given that the land is not defined as Green Belt nor does it within the locations identified within Footnotes 9 and 6 and is therefore not consistent with the NPPF.	environment by, amongst, other things, protecting and enhancing valued landscapes. Designation as a green wedge is recognition of the importance of an area of land to the character of Darlington, and the proposed conditions on development are not considered to be overly restrictive given the nature and character of the land involved (including extensive coverage of areas of open space, designated wildlife sites and flood zones 2/3).	
Mr John Fleming	Gladman Developments			DBDLP 1089	Policy ENV 3	Local Landscape Character	Neutral	Policy ENV 3 seeks to protect the local landscape character of the local area for its own sake. In particular, it seeks to implement several rural gaps where development will only be limited in a set of strict circumstances. Gladman submit that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances, we would question the purpose of these gap designations, particularly if these would prevent the development of otherwise sustainable and deliverable sites from coming forward to meet the borough's housing needs. Notwithstanding this, if this element of the policy is to be retained then it should be justified by robust evidence and be altered to allow for a balancing exercise to be undertaken which assesses any harm to the visual or functional separation of settlements against the benefits of the proposal rather than a blanket restriction on many forms of development as is currently the case.	Policy ENV3 seeks to protect the character and local distinctiveness of the Borough's urban area, villages and rural area through a number of policy measures. One measure is the identification of a number of rural gaps between settlements that help to retain their landscape character, setting and individual identity. Policy ENV 3 does not place a blanket ban on development in rural gaps, but, in recognition of the importance of these gaps to the character and identity of the rural settlements involved, it does install a number of criteria against which development proposals will be considered in order to limit the impact of development on the character and identity of settlements. The identification of rural gaps has been informed by the Local Plan strategy and site selection process (including the Sustainability Appraisal), the Landscape Character Assessment of the borough and Conservation Area Appraisals where applicable. For example the rural gap between Middleton One Row and Middleton St George is included within Middleton one Row Conservation Area Conservation Area highlighting the importance of this gap to the conservation area. In addition, the Landscape Character Assessment highlights that the settlement edges around the southern part of Middleton St George and Middleton One Row display a higher sensitivity to residential development.	No change recommended.

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Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1347	Policy ENV 3	Local Landscape Character	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.
Major Frederick Greenhow MBE				DBDLP 96	9.3.3	Paragraph	Object	I strongly object - If Skerningham Strategic Allocation was to go ahead - surely this is going against DBC's own policy statement above - 'Retaining the openness and green infrastructure functions of:...The rural gaps, between Middleton St George and Middleton One Row, Middleton St George and Oak Tree, Hurworth on Tees and Hurworth Place, and between Darlington and the villages of Great Burdon and Barmpton'; As there will be a huge property development of upto 1800 homes prior to 2036 between Barmpton & Burdon.	The Local Plan must be read as a whole. The Masterplan Framework for the Skerningham Strategic Allocation (Figure 6.1) indicates that development on the allocation site should be set back from the villages of Great Burdon and Barmpton, maintaining their separation from the main built up area of Darlington. The inclusion of Barmpton and Great Burdon in the list of rural gaps to be maintained is a reaction to the Skerningham allocation as these settlements were not included in the previous iteration of this policy. Their inclusion will ensure that, following the completion of the Skerningahm site, no further encroachment of development towards these rural settlements will be allowed.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 415	9.3.5	Paragraph	Object	Applications for Local Green Space in the Skerningham area have been effectively suspended by the Skerningham Strategic Allocation "Masterplan" although they would all appear to compliment the sentiments of the statement.	Whilst the Local Plan does not designate any Local Green Spaces that currently fall within sites allocated for development in the plan, future reviews of the Local Plan will enable these areas to be reconsidered once there is more certainty over the layout of proposed development on these sites and any necessary compensatory measures resulting from the planning application process.	No change recommended.
Mr David Clark				DBDLP 73	9.3.9	Paragraph	Object	Skerningham Rural Landscape 251 Map 7 traditional field patterns, hedgerows and wetlands are not being protected through this policy?	Policy H 10 includes a number of criteria to guide the development of the site including reference to retaining and enhancing existing hedgerows on the site which would also result in the retention of field patterns. Wetlands on the site, along with other areas of biodiversity interest, will be protected under the provisions of Policies ENV 7 and ENV 8. The intention is to create a comprehensive network of green and blue infrastructure across the site that meets the Governments objective of delivering net environmental gains.	No change recommended.
Mr				DBDLP 635	9.3.9	Paragraph	Object	The rural landscape characterised by mostly open, arable farmland including	Policy ENV 7 criterion D states that that Council will seek to protect and enhance the	No change recommended.

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Colin Raine								hedgerows around Hurworth is in need of protection, is there a map available which shows these areas of 'rural landscape' which are to be protected & how will this protection be applied?	natural quality of the rural landscape, where appropriate, reinstating traditional natural and built features. Hurworth also benefits from having a Conservation Area where maintaining the open rural setting of parts of the conservation area will be an important consideration should development proposals arise in these locations. The Council's Landscape Character Assessment is also a consideration in determining planning applications that will affect areas of high landscape sensitivity. Finally the Council has an adopted Revised Design of New Development SPD that provides advice on matters of design and local distinctiveness that is a material consideration in the determination of planning applications.	
Mr Colin Raine				DBDLP 636	9.3.10	Paragraph	Support	The rural landscape is vital to the Borough & should be cherished as part of Darlington's natural & historic environment. It is difficult to see how the rural landscape can be protected through the planning policy, with the huge amount of houses that DBC has deemed necessary, despite the lower housing estimates given by the government.	Comment noted. Planning applications, including those for sites allocated in the plan, will need to demonstrate that they conform with the policies in the Local Plan.	No change recommended.
Mr Tim Ellis				DBDLP 88	Policy ENV 4	Green Infrastructure	Object	I do not want to see local countryside destroyed just because you hope to grab more cash from the government and more council tax. The people of the town and specifically want access to walks and areas without development great use is made for leisure and recreation. I would also like to remind you as a council you are supposed to carry out the express wishes of the town's people not developers and money grabbers.	Darlington Borough Council, as the local planning authority for the area, are required to prepare a Local Plan that meets the needs of the Borough over the long term. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where land is available, and it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal and other related evidence.	No change recommended.
Dr Ellen	Lead Adviser			DBDLP 297	Policy ENV 4	Green Infrastructure	Support	Natural England welcomes policy ENV4 on Green Infrastructure (GI) and the emphasis on its multi-functional	Support noted.	No change recommended.

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Bekker	Natural England							character, including links to other relevant policies, such as on biodiversity and sustainable drainage and to the GI Strategy.		
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 419	Policy ENV 4	Green Infrastructure	Object	The policy states planning permission would be refused for development that would result in the loss of existing green space. Skerningham Community Woodland is identified on the Darlington Green Infrastructure Network plan as a Designated Wildlife Area. How can there be a suggestion that Darlington Golf Club could relocate to Skerningham Community Woodland where that woodland has a formal designation which should protect it.	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 690	Policy ENV 4	Green Infrastructure	Support	CPRE welcomes Policy ENV4, but we are puzzled by the phrase in Clause F i) "surplus of green infrastructure" which goes on to suggest that Green Infrastructure can be quantified as "enough to meet the needs of residents" However, as Policy ENV 5 spells out there are at least five purposes for Green Infrastructure only three of which could be considered to be about meeting the needs of residents. We suggest that this clause is thought through more clearly and redrafted. In addition, who decides if there is a surplus, surly the reason for the Local Plan is to pre-allocate usage! And can there be a surplus of any type of Green Infrastructure? ENV 5 is about creating GI where possible, so why can there be a surplus.	Policy ENV 4 reflects the provisions of paragraph 97 of the NPPF regarding the conditions under which the loss of open space can be considered acceptable. Even if the conditions of Policy ENV 4 and the NPPF are met, there may be other functions or features of an open space that would mean that development would not be appropriate or permissible under another policy in the Local Plan or National Policy. Each case must be considered on its individual merits. The council are in the process of updating its information on the quantity and quality of open space in the Borough.	No change recommended.
Mr	Planning Officer			DBDLP 575	Policy ENV 4	Green Infrastructure	Support	Figure 9.1 of the plan shows Darlington's Green Infrastructure	The list of routes provided in paragraph 10.1.21 makes it clear that this is not a comprehensive	No change recommended.

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Ross Chisholm	Friends of the |Stockton and Darlington Railway							Network. The line of the S&DR is shown as a strategic/local green corridor, to be protected and enhanced by Policy ENV 4, which we support. It also proposes the creation of a recreation route from the edge of the town to Piercebridge along the track of the former 1856 railway to Barnard Castle, operated by the S&DR. We support this proposal also and suggest it be added to the list of routes in paragraph 10.1.21. The S&DR footpath and cycle route follows the Fighting Cocks Branch alongside Tornado Way, between Haughton Road and the A66 Bypass. Unfortunately this is a 2.5 km long wide, bleak and featureless traffic and highway dominated element in the green corridor network. The landscaping proposals intended to accompany the construction of the road have not been implemented. A new planting scheme should be prepared to soften the impact of the road, improve the outlook of residents and create a pleasant experience for those using the path. Significant tree planting was proposed here by the former Tees Forest initiative and this should be resurrected. Development adjacent to the corridor should be required to contribute. The protection of the S&DR green corridor by Policy ENV 4 will impact on some development sites within 50 metres of the line (Policy ENV 2). Clear guidance should be set out for each affected allocated site so that developers are aware of the requirements of the Plan. For example, development at Greater Faverdale (site 185) and Faverdale East Business Park (site 342) should be required to provide	list but includes examples that area likely to be delivered during the plan period. Whilst the Council supports the delivery of the route from the town to Piercebridge, there is less certainty that this route will come forward during the plan period. Landscaping of the route between Haughton Road and the A66 Bypass is not an issue that can be addressed by the Local Plan. Where appropriate, reference to the S&DR has been made in the development guidelines for each Local Plan allocation. Policy H 11 for the Greater Faverdale strategic allocation includes a reference to the S&DR and Policy ENV 2 in the policy text and also indicates that the development should create a new pedestrian route alongside the railway line on the Masterplan Framework plan (Figure 6.3). The site south of Bowes Court (site ref 42) was granted planning permission in 2016 and therefore predated the draft Local Plan.	

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								an appropriately landscaped minimum 15 metres corridor, carrying the footpath and cycle route Heritage Trail alongside the operational line. In contrast, the Railway Housing Association's development at Haughton Road (South of Bowes Court Site 042) over the green corridor directly conflicts with policy ENV 4 and the proposed extension of building eastwards to Barton Street must be in question.		
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 841	Policy ENV 4	Green Infrastructure	Object	Policy ENV 4 requires green and blue infrastructure to be protected. Skerningham Estates Ltd supports the protection of such features given their importance to the quality of life, as well as for biodiversity. However, there could be cases where the loss of such infrastructure could be justified should appropriate mitigation or compensation be provided. Skerningham Estates Ltd suggests the following amendments to this policy in accordance with the NPPF 2018 (paragraphs 92 and 170): *"Green and blue infrastructure will be protected wherever possible, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multifunctional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity."*	Criterion F of Policy ENV 4 identifies the circumstances under which the loss of existing green spaces can be justified as a result of development proposals. This reflects the position set out at paragraph 97 of the NPPF.	No change recommended.
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1032	Policy ENV 4	Green Infrastructure	Support	LCMPC support the principles of policy ENV4 (green infrastructure), however the policy or supporting text should clearly set out that communities, through their neighbourhood plans, have a role in identifying important green infrastructure within their areas.	Support noted. Whilst communities can choose to identify green infrastructure within a neighbourhood plan it is not considered necessary to include a reference to this in the Local Plan.	No change recommended.
N/A		Mr	WYG	DBDLP 1120	Policy ENV 4	Green Infrastructure	Neutral	The wording of this policy should be amended to allow an assessment of GI	Criterion F of Policy ENV 4 identifies the circumstances under which the loss of existing	No change recommended.

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Darlington Farmers Auction Mart N/A		Christopher Martin						to establish the quality of the GI and whether any loss would need to be compensated.	green spaces can be justified as a result of development proposals. This reflects the provisions set out at paragraph 97 of the NPPF.	
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP 1261	Policy ENV 4	Green Infrastructure	Support	We **support** Policies ENV4 and ENV5, which are consistent with national policy and will have far reaching benefits to the environmental, social and economic needs of the community as set out in paragraph 9.4.3. To be deliverable all stakeholders, including landowners will need to be involved.	Support noted.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1348	Policy ENV 4	Green Infrastructure	Neutral	Whilst our Client notes that the provision of Green Infrastructure is important to provide quality places, this needs to be balanced with the requirement to use development land efficiently and to ensure new development can be viable and deliverable. It is noted that all Bellway schemes integrate carefully planned green infrastructure and ecological mitigation within a robust landscape framework etc. This can only happen where viability is not unduly affected, and our Client therefore seeks flexibility in terms of any requirements for Green Infrastructure provision contained in the Local Plan.	Comment noted.	No change recommended.
Charles Johnson	Conservative Group			DBDLP 146	Policy ENV 5	Green Infrastructure Standards	Support	We require robust and full implementation of this policy during planning which will offset some of the decline identified in ENV4.	Support noted.	No change recommended.
Simon Bainbridge				DBDLP 402	Policy ENV 5	Green Infrastructure Standards	Object	The Skerningham Masterplan is at odds with the Council's Green Infrastructure Strategy and standards. Any development on this area, including the golf club will be severely	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.

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								detrimental to the wildlife and contribute to the national devastation of woodland and farmland bird numbers. Darlington Council's designations such as Skerningham Countryside park, Green Infrastructure strategy, Skerningham Community Woodland, Designated Wildlife Area and Green Corridors all seem to be forgotten.		
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 420	Policy ENV 5	Green Infrastructure Standards	Support	We support this policy but it must be robustly defended.	Support noted.	No change recommended.
Gillian Tasson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 692	Policy ENV 5	Green Infrastructure Standards	Support	CPRE supports Policy ENV5.	Support noted.	No change recommended.
Mrs Laura Roberts	Northumbrian Water			DBDLP 741	Policy ENV 5	Green Infrastructure Standards	Support	Northumbrian Water undertakes many roles in its duty to provide water and waste water services to the region. As a statutory undertaker in the provision of these services we are a formal consultee on all emerging planning policy. Our New Development department provides a planning service which seeks to protect our assets and supports new development through ensuring our network and facilities have capacity to accommodate sustainable growth. We work closely with Local Authorities to monitor proposed development and track growth, and our consultation responses to emerging planning policies reflect this. We also seek to promote sustainable design in drainage and water conservation as part of tackling flooding. Separately, our Estates department is responsible for land and estate issues associated with our	Support noted.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								operational, non-operational and surplus land. They act in the interests of Northumbrian Water by producing and submitting LDF representations to safeguard or release any operational or surplus land. They also seek opportunities to redevelop our redundant sites. Consequently, you will see two separate responses submitted from Northumbrian Water for this emerging plan. These responses should be read individually with an understanding of the two different planning roles Northumbrian Water undertakes. We welcome the use of Green Infrastructure on development sites and we support the high prioritisation of green space types associated with flood and water management systems.		
Paul Hunt	Persimmon Homes			DBDLP 1198	Policy ENV 5	Green Infrastructure Standards	Neutral	There appears to be no justification for the use of the threshold of 20 dwellings or more.	The requirement for on-site provision of green infrastructure is taken from the Council's adopted Planning Obligations SPD.	No change recommended.
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1121	Policy ENV 5	Green Infrastructure Standards	Neutral	DFAM recognises the importance of GI and its role in creating sustainable places, our concern with the approach in Policy ENV5 is the assumption that all development of a certain size needs to provide GI. GI requirements should be assessed on a site by site basis depending on the local context.	The standards referred to in Policy ENV 5 are based on an assessment of the quantity and quality of open space in the Borough to determine locally derived standards and are set out in the Council's Planning Obligations Supplementary Planning Document (SPD). As set out at paragraph 9.4.15 of the Local Plan the Council is in the process of updating the information it holds on the quantity, quality and distribution of green spaces across the Borough and that the outcome of this work may result in an update to the provision standards contained in the Planning Obligations SPD.	No change recommended.
Thoroton and Croft Estate		Mr Joe Ridgeon		DBDLP 1262	Policy ENV 5	Green Infrastructure Standards	Support	We **support** Policies ENV4 and ENV5, which are consistent with national policy and will have far reaching benefits to the environmental, social and economic needs of the community as set out in paragraph 9.4.3. To be	Support noted.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								deliverable all stakeholders, including landowners will need to be involved.		
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1349	Policy ENV 5	Green Infrastructure Standards	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 226	9.4.7	Paragraph	Neutral	How will Skerningham and any new roads fit with the Brightwater Project outputs for the River Skerne?	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 842	9.4.7	Paragraph	Neutral	Skerningham Estates Ltd recognises that paragraph 9.4.7 expects the development of the Skerningham Strategic Allocation to include enhancements of the river corridor to the north of the town. Skerningham Estates Ltd is supportive of this policy and recognises the important benefits that the enhancement of the river corridor can bring to the quality of life and biodiversity. Skerningham Estates Ltd would like to work with the Council and the Environment Agency to bring forward an appropriate programme of enhancements.	Comment noted.	No change recommended.
Mr David Phillips	Darlington Friends of the Earth			DBDLP 225	9.5.1	Paragraph	Neutral	Green infrastructure should include "homes for nature". Current design of buildings discourages nesting birds but the provision of nest boxes for example may well remedy this problem, not just encouraging wildlife back into our urban areas but also potentially benefit our own health and well-being. Green spaces should also be for nature and not just for leisure purposes. Wildlife needs to be able to feed, breed and disperse with disturbance kept to a minimum.	The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of suggested measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referred to under several policies in the emerging Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	No change recommended.
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP 266	Policy ENV 6	Local Green Space	Support	It is good to see that permission will not be granted for any development on the areas listed under Policy ENV6 which includes Merrybent Community	Support noted.	No change recommended.

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								Woodland which I assume is the woodland planted next to Devonshire Court and designated woodland by the CO Op who sold the land for the housing development.		
Paul Hunt	Persimmon Homes			DBDLP 1199	Policy ENV 6	Local Green Space	Neutral	Policy ENV6 identifies the Local Green Spaces within Table 9.1, and refers to Local Green Spaces being identified within the Polices Map; however the Polices Map does not identify these areas.	Local Green Space designations are shown on the Policies Map.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1350	Policy ENV 6	Local Green Space	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP 265	9.5.6	Paragraph	Neutral	In response to 9.5.6 page 90 I wish to nominate the following for local Green Spaces:- • Heighington and the A1M • Heighington and Redworth • Heighington and the Chestnuts • Killerby and Summerhouse • Summerhouse and Denton • Piercebridge and High Coniscliffe • High Coniscliffe and Merrybent • Merrybent and low Coniscliffe • Low Coniscliffe and the Cocker beck pub • And all hamlets in between.	Areas of this size are not suitable for Local Green Space designation. Development Limits (Draft Policy H3) is the more appropriate mechanism of protecting areas of open countryside.	No change recommended
Ken Walton				DBDLP 341		Protecting and Enhancing Biodiversity and Geodiversity	Object	Building excessive development does not protect nor enhance biodiversity!	Noted. Protecting and enhancing the countryside and the natural environment is one of the overarching aims of the Darlington Local Plan. The Environment section of the Local Plan seek to achieve this aim through specific	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									policies designed to protect the Borough's historic environment, green spaces and biodiversity. In selecting allocation sites the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal and other related evidence.	
Mrs Wilma Campbell				DBDLP395	9.6.1	Paragraph	Object	With housing pressure mounting, DBC need to be taking a more proactive stance in protecting and improving habitats for wildlife, where housing developments have been planned. The council's planners and ecologists should be insisting that housing developers include feasible wildlife friendly features to show that new housing isn't bad news for wildlife. These features of course depend on each individual site however many of the ideas can be achieved with little or no extra cost to the builder but with great benefits to the new community and wildlife. Hedgehog highways, bat and swift boxes, wildflower verges, fruit trees planted, extensive native hedges, bat friendly lighting, avenues of trees and green corridors through the built environment, permeable paving etc. Example given of how nature is being integrated with nature at Kingsbrook in Aylesbury Vale District.	The intention is to create a comprehensive network of green and blue infrastructure across the site that meets the Governments objective of delivering net environmental gains. The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of suggested measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referred to under several draft policies in the Draft Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	No change recommended.
Mrs Wilma Campbell	Chair EPICH			DBDLP679	9.6.1	Paragraph	Neutral	E.P.I.C.H. (Eco People in Croft and Hurworth) would like more specific information on what strategies DBC have put in place to implement the Government's 25 Year plan to improve the environment 2018.	Protecting and enhancing the countryside and the natural environment is one of the overarching aims of the Darlington Local Plan. The Environment section of the Local Plan seek to achieve this aim through specific policies designed to protect the Borough's historic environment, green spaces and biodiversity. In selecting allocation sites the Council has sought to avoid areas of highest landscape, environmental and agricultural value as	No change required.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								Example given of how nature is being integrated with nature at Kingsbrook in Aylesbury Vale District. DBC should set clear goals to future housing developers to ensure that wildlife friendly features are achievable in almost any development.	considered in the Council's Sustainability Appraisal and other related evidence. The Council's adopted Revised Design of New Development Supplementary Planning Document (SPD) includes a number of suggested measures for improving the biodiversity of development proposals including introducing nesting boxes, green roofs, street trees and fruit trees, wetlands etc. This advice is a material consideration in the determination of planning applications and is referred to under several draft policies in the Draft Local Plan. The Council intends to retain and update this SPD following the adoption of the Local Plan.	
Charles Johnson	Conservative Group			DBDLP 148	Policy ENV 7	Biodiversity and Geodiversity and Development	Neutral	How many SSI's need protection?	Information on designated sites in Darlington is available on the Tees Valley Nature Partnership website. The Borough contains four SSSI sites (Newton Ketton Meadow, Redcar Field, Neasham Fen and Hell Kettles) covering some 9 hectares in total.	No change recommended.
David Phillips	Darlington Friends of the Earth			DBDLP 232	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	How will Skerningham and any new roads fit with the Brightwater Project outputs for the River Skerne?	Please see officer response on the Skerningham Strategic Allocation.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 423	Policy ENV 7	Biodiversity and Geodiversity and Development	Support	We support this policy but it must be robustly implemented. If even only part of the Skerningham Countryside Park/Skerningham Community Woodland were lost, biodiversity would be adversely affected in contradiction to this policy.	Support and comments on implementation noted. Please see officer response on the Skerningham Strategic Allocation.	No change recommended
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 425	Policy ENV 7	Biodiversity and Geodiversity and Development	Object	The loss of Skernignham Community Woodland to a relocated golf club is in conflict with clauses D and H of Policy ENV 7.	Policy ENV 7 allows for circumstances where the loss of woodland would be permissible provided that the benefits clearly outweigh the loss and suitable replacement planting can be undertaken. Please see officer response on the Skerningham Strategic Allocation.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mr Colin Raine				DBDLP 637	Policy ENV 7	Biodiversity and Geodiversity and Development	Support	How specifically will developers be adhering to the policy on wildlife corridors & the protection of wildlife on the whole? Could developers with a proven track record in Ecological enhancement be looked upon more favourably for planning consent? Could these requirements be retrospectively introduced where practical, to developments that have had planning permission granted but have not yet commenced the work? Could developers be encouraged to plant hedges between gardens instead of fences for instance, as this would help the now endangered hedgehog population. Small undertakings like these would only help to improve the image of some developers & raise the profile of the Planning Dept.	Draft Policy ENV 8 sets out the requirements for assessing the impact of development proposals on biodiversity through the planning application process and how necessary measures to avoid, mitigate and/or compensate for impacts will be secured. Planning conditions and/or planning obligations are used to secure any mitigation required. Planning applications have to be determined on their individual merits irrespective of the applicant. Requirements cannot be retrospectively introduced to development proposals where planning permission has already been granted. Measures such as those suggested could be required to mitigate the impact of a development where appropriate and practical to do so.	No change recommended.
Mr A Macnab	Middleton St George Parish Council			DBDLP 826	Policy ENV 7	Biodiversity and Geodiversity and Development	Neutral	Also vitally important, are the green areas such as The Whinnies Nature Reserve and the Water Park. We would like to see the Water Park also listed as a Nature Reserve.	The Council has recognised the importance of the Water Park to the local community in its proposed designation as a Local Green Space under draft Policy ENV 6. In order to designate the Water Park as a Local Nature Reserve (based on its community and wildlife value) or Local Wildlife Site (wildlife value only) the site will require an up-to-date ecological survey. The community can explore either of these options with Natural England (for Local Nature Reserves) or the Tees Valley Nature Partnership (for Local Wildlife Sites). The Council's ecologist can provide advice on the scope of an ecological survey and what is required to designate the site.	No change recommended.
Mr Neil	Senior Director	Mr Neil	Skerningham Estates Ltd	DBDLP 844	Policy ENV 7	Biodiversity and Geodiversity	Neutral	Skerningham Estates Ltd recognises that Policy ENV 7 (B) encourages improvements to the value and	Comment noted.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Westwick	Skerningham Estates Ltd	Westwick				and Development		ecological mix of the River Skerne Strategic Corridor through undertaking activities including restoring the natural river course and systems and character (e.g. meanders and earth bank sides). Skerningham Estates Ltd would propose to work with the Council in relation to these activities.		
Jo-Anne Garrick	Low Coniscliffe and Merrybent Parish Council			DBDLP 1035	Policy ENV 7	Biodiversity and Geodiversity and Development	Support	LCMPC support the principles of policy ENV 7 (biodiversity and geodiversity and development), however the policy or supporting text should clarify that communities, through their neighbourhood plans, have a role in identifying important areas of biodiversity networks/ wildlife corridors within their areas.	Support noted. Whilst communities can choose to identify areas of biodiversity networks/wildlife corridors within a neighbourhood plans it is not considered necessary to include a reference to this in the Local Plan.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1351	Policy ENV 7	Biodiversity and Geodiversity and Development	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.
Charles Johnson	Conservative Group			DBDLP 149	Policy ENV 8	Assessing a Developments Impact on Biodiversity	Object	The policy appears to firmly regulate the impact of developments yet offers a commercial solution to avoid the regulations. Not acceptable.	Policy ENV 8 complies with national policy and guidance and should be read in conjunction with Policy ENV 7. If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.	No change recommended.
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP 426	Policy ENV 8	Assessing a Developments Impact on Biodiversity	Object	This appears to be a process rather than a policy and requires redrafting. This policy allows a developer to massage other policies aside if it happens to interfere with the process/progress of a development. The policy is drafted from the viewpoint of development not the point of view of Biodiversity which is surely what this policy is promoting.	The policy follows the 'mitigation hierarchy' set out in paragraph 175a of the NPPF.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner	DBDLP 1352	Policy ENV 8	Assessing a Developments	Neutral	Our Client does not have any specific comments in relation to this policy but	Comment noted.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
			Barton Willmore			Impact on Biodiversity		reserve the right to comment at a later date.		
Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	Mr Simon Bainbridge	Member Barmpton and Skerningham Preservation Group	DBDLP427	9.6.6	Paragraph	Object	The Skerningham Strategic Allocation would not allow improved connectivity along the Skerne particularly if Darlington Golf Club were moved into Skerningham Community Woodland. Reference is made to the decline in 2 bird species. This does not do enough to reflect the major decline in bird populations countrywide and this needs to be much more robust. Observations of bird species in Skerningham Community Woodland amount to the presence of 58 species of which 13 are on the British Trust for Ornithology's "RED" list and 10 are on the "AMBER" list as being of conservation concern.	Please see officer response on the Skerningham Strategic Allocation. Protecting and enhancing the countryside and the natural environment is one of the overarching aims of the Darlington Local Plan. Policy ENV 8 requires applicants to assess a developments impact on biodiversity and determine how impacts can be avoided, or failing that, adequately mitigated.	No change recommended.
Dave McGuire	Sport England (North East)			DBDLP101		Outdoor Sports Facilities	Neutral	A central tenet of Plan-making remains that the plan must be based on adequate, up-to-date and relevant evidence. For a playing pitch strategy (PPS) to be considered "up to date", it should have been undertaken within the last three years. For a built facilities strategy to be considered "up to date" it should have been carried out within the last five years. Darlington's PPS and Built Facilities Strategy were undertaken in 2014/5, so that former is now technically out of date whilst the latter is still within time. Sport England are amenable to extending the lifespans of both strategies if the supply and demand data that underpins them has been kept up to date on a regular basis. Unfortunately we have no evidence to suggest that Darlington Council has been successful in this task.	Comments noted. In discussion with Sport England, the Council are undertaking an update of the 2015 Darlington Playing Pitch and Sports Facility Strategy.	No change recommended.

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								Paragraph 9.7.7 of the Draft Local Plan states that the Council is currently in the process of updating the 2015 Darlington Playing Pitch and Sports Facility Strategy along with the accompanying needs assessment and evidence base. Sport England (and the respective sports' National Governing Bodies) would welcome clarification on the work that has been undertaken / commenced in order to reach a point where we are agreed that the Council has a robust evidence base for sport in good time for the Plan's submission. We noted that the last PPS and Sports Facilities Strategy were based on population growth that was small scale, with an impact on facility demand that was largely off-set by the overall ageing of the population. The population growth planned for in consultation draft Plan is more significant and is likely to upset this equilibrium. Moreover it is mostly taking place on greenfield sites that are not always served by the Borough's current network of sports provision. We note that a number of the proposed major greenfield allocations include an acknowledgement that they will need to make provision sport, and indeed provided the schools are suitably designed this could be part of the education provision that is proposed. However until such time as the PPS and Sports Facility Strategy are reviewed and updated we are concerned that this may be guesswork. See full response for further details.		

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Dave McGuire	Sport England (North East)			DBDLP105	Policy ENV 9	Outdoor Sports Facilities	Support	Policy ENV 9 Outdoor Sports Facilities – Support	Support noted.	No change recommended.
Charles Johnson	Conservative Group			DBDLP150	Policy ENV 9	Outdoor Sports Facilities	Object	Recent history demonstrates the need for much more robust protection of residential amenity and greater weight needs to be considered in planning reports.	Draft Policy ENV 9 stipulates that proposals for the development of new outdoor sports facilities should protect the amenity of existing users of neighbouring land and buildings in line with Policy DC 3: Safeguarding Amenity. Policy DC 3 includes for consideration of matters including the potential noise, disturbance and artificial lighting from the proposed use of land and buildings. This is considered a sufficiently robust policy basis under which each development proposal can be considered on their merits.	No change recommended.
Ken Walton				DBDLP340	Policy ENV 9	Outdoor Sports Facilities	Neutral	I support not having to access these facilities by means of transport, more places should be on our door step and exercise and recreation should be encouraged for all age groups and disabilities.	Comment noted. The policy stipulates that proposals for new outdoor sports facilities should not give rise to significant traffic congestion and be accessible by walking, cycling and public transport.	No change recommended.
Gillian Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP698	Policy ENV 9	Outdoor Sports Facilities	Support	CPRE supports Policy ENV9.	Support noted.	No change recommended.
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP952	Policy ENV 9	Outdoor Sports Facilities	Object	Outdoor and indoor sporting facilities are essential for the wellbeing of the village community at every age group, this needs to be in the centre of the village for fair access to everyone (i.e. *redevelop the cricket club to accommodate a full sporting hub. This area can be accessed by walking or cycling in line with Policy IN 2).*	Comment noted. The plan recognises the importance of sport to people's health and wellbeing. Policy ENV 9 would allow a proposal to redevelop the cricket club as a sporting hub to happen provided that it satisfied the other policies in the Local plan, and subject to consultation with Sport England.	No change recommended.
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1353	Policy ENV 9	Outdoor Sports Facilities	Neutral	Our Client does not have any specific comments in relation to this policy but reserve the right to comment at a later date.	Comment noted.	No change recommended.

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Mr Simon Nicholson				DBDLP25	10	TRANSPORT AND INFRASTRUCTURE	Object	Seeking improved cycling provision. Speed limit reduction on all residential streets.	Cycling provision is encouraged in all developments as part of the plan including provision of new routes, enhancement of existing and providing improved connections. Speed limits are a highways matter and can be altered where there are justified concerns over safety.	No change recommended
Mr Paul Hollyer				DBDLP244	10	TRANSPORT AND INFRASTRUCTURE	Neutral	Traffic Calming measures not mentioned for Roads like Yarm, North and Neasham Road .	Comment is noted but traffic calming is not a matter for the local plan and could be implemented by the Highway Authority if they see fit.	No change recommended
Mr Paul Howell				DBDLP322	10	TRANSPORT AND INFRASTRUCTURE	Object	Timing of delivery of highway infrastructure key.	Agree timing and delivery of infrastructure is key however it is often difficult to provide highway infrastructure in advance of the development that is contributing to it's funding. Development often has to take place in tandem.	No change recommended
Mr Julie Nixon				DBDLP327	10	TRANSPORT AND INFRASTRUCTURE	Object	Housing impact on traffic congestion. Also environmental issues of creating new road.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Ms Julie Nixon				DBDLP328	10	TRANSPORT AND INFRASTRUCTURE	Object	Concern raised over impact of development on highway safety	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Ralph Bradley				DBDLP450	10	TRANSPORT AND INFRASTRUCTURE	Object	Primarily a Skerningham objection. Local plan does not deal adequately with development pressure on road network.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mrs Jennifer Bradley				DBDLP449	10	TRANSPORT AND INFRASTRUCTURE	Object	Primarily a Skerningham Objection. Local Plan does not deal adequately with pressure on roads from developments. Same as comment 450.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher	Highways England			DBDLP880	10	TRANSPORT AND	Object	Highways England need to understand both the individual and cumulative impact upon the Strategic Road	Overview of approach noted and requirement to continue to work with Highways England is supported. In addition evidence will be	No change recommended

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Bell						INFRASTRUCTURE		Network (SRN) of all sites that are identified within the Plan and whether mitigation measures are likely to be required at any SRN location. Should it be likely that a development will have a severe impact at the SRN, Highways England would need to work with the developer and the local highway authority to ensure that the impact is appropriately managed down and/or mitigated. In addition, should the proposed development cumulatively, within the Plan have a severe impact on the SRN, then Highways England would wish to see appropriate mitigation in an Infrastructure Delivery Plan [IDP] along with appropriate identification of how this will be delivered. Appendix A of the technical memorandum (Which can be viewed in full online) identifies whether each of the individual sites are likely to be a concern for Highways England with regards to their potential impact at the SRN. Several of the larger sites identified within the Plan are likely to be a concern for Highways England and mitigation may be required at the SRN in order to cater for the potential development traffic associated with these sites. Highways England would welcome the opportunity to continue to work with Darlington Borough Council to identify the potential impact of the Plan sites on the SRN, in order to ensure that their impact is fully understood and if necessary mitigated through appropriate inclusions within individual site details and/or the IDP.	provided to demonstrate that potentially severe impacts on the SRN can be adequately mitigated.	

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Mr Christopher Bell	Highways England			DBDLP881	10	TRANSPORT AND INFRASTRUCTURE	Neutral	Background on the context of the Highways England response.	Noted. No action required.	No change recommended
Mr Christopher Bell	Highways England			DBDLP897	10	TRANSPORT AND INFRASTRUCTURE	Support	Highways England welcomes DBC's aims in working together in partnership and is committed to an ongoing partnership, to ensure the safe and functional operation of the SRN. General support for the aims and content of this section and approach to modelling highway impacts.	General support for approach and need for ongoing working noted.	No change recommended
Mr Christopher Bell	Highways England			DBDLP900	10	TRANSPORT AND INFRASTRUCTURE	Neutral	Outlining that location of housing, employment and retail is Highways England's main interest and these will require further consideration should they be deemed likely to have an impact on the Strategic Road Network. Comments have been provided on individual proposed allocations and not commitments. Sites have been split into three categories 'of concern', 'of possible concern' or 'of no concern'.	Approach to commenting has been noted and we will continue to liaise with Highways England on highway matters prior to publication of the plan.	No change recommended
Mr Christopher Bell	Highways England			DBDLP936	10	TRANSPORT AND INFRASTRUCTURE	Object	Summary of cumulative totals of development proposed in the local plan. Reiteration that sites have been categorised as being either 'of concern', 'of possible concern' and 'of 'no concern'. Given the cumulative total of development proposed it is concluded that impact on the Strategic Road Network could be significant in some areas and Highways England will need to see adequate mitigations demonstrated to adequately deal with potentially adverse impacts.	The council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended

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Mr Mike Allum	Durham County Council			DBDLP1057	10	TRANSPORT AND INFRASTRUCTURE	Support	Support noted.	No action required.	No change recommended
Mr Mike Allum	Durham County Council			DBDLP1059	10	TRANSPORT AND INFRASTRUCTURE	Support	Support noted. Ongoing discussions over connected rail network encouraged.	Agreed and will continue to be a duty to cooperate matter.	No change recommended
Mr Mike Allum	Durham County Council			DBDLP1060	10	TRANSPORT AND INFRASTRUCTURE	Support	Support for improvements to freight movement by road and rail.	Support noted.	No change recommended
Mr Derek Dodwell	Darlington Association of Parish Councils			DBDLP1066	10	TRANSPORT AND INFRASTRUCTURE	Neutral	Importance of delivering necessary transport and highway enhancements in a timely fashion.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. An infrastructure plan is being prepared to support the Local Plan and will identify infrastructure required to support new development. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan.	No change recommended
Ms Michelle Saunders	North Yorkshire County Council			DBDLP1071	10	TRANSPORT AND INFRASTRUCTURE	Support	Support to maintain the levels of cross boundary passenger transport.	Support noted	No change recommended
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP1137	10	TRANSPORT AND INFRASTRUCTURE	Support	Support for promoted rural site which is likely to have less impact on highways congestion than urban sites.	Highways is one of a number of factors to consider in assessing sustainability of sites.	No change recommended

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Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP 1409		Delivering a sustainable transport network	Support	Sustainable transport network vital to encourage multi modal transport and choices The Infrastructure Development Plan should clearly articulate measures required to support public transport provision.	Support noted and issues taken up in the Darlington Infrastructure Development Plan	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 233	10.1.1	Paragraph	Object	Concern about proposed road building and environmental impacts.	New highway infrastructure will need to be subject to more detailed environmental consideration in due course. The plan does priorities sustainable transport methods in accordance with the NPPF (Chapter 9).	No change recommended
Mrs A E Reed				DBDLP 82	Policy IN 1	Delivering a Sustainable Transport Network	Neutral	Bus Station and Tourist information required.	Buses are an essential element of every town's economy and in Darlington they provide people with access direct into the heart of the town centre to shop and access services. Integrating bus services into the town centre was a specific feature of the Pedestrian Heart during the design stages over 10 years ago. Safety checks were made during the design to consider pedestrian safety. There is a strong desire from bus users for bus stops to be accessible as close as possible to shopping areas, to facilitate this, buses have been incorporated into the town's road network like many other towns and cities in the Country. If a bus station were constructed then buses would not operate through the town centre. Provision of Tourist Information is likely to be reconsidered as part of the town centre strategy.	No change recommended
Mr Tim Ellis				DBDLP 83	Policy IN 1	Delivering a Sustainable Transport Network	Object	Concern over traffic congestion and growth of the town.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended

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Mr Tim Ellis				DBDLP86	Policy IN 1	Delivering a Sustainable Transport Network	Object	Complaint about traffic management.	Objection noted.	No change recommended
Charles Johnson	Conservative Group			DBDLP151	Policy IN 1	Delivering a Sustainable Transport Network	Object	Private vehicles will remain the dominant form of transport of the foreseeable future and the plan should recognize that.	Objection noted however the NPPF (Chapter 9) requires plans to favour the use of sustainable transport methods.	No change recommended
Anne Rudkin				DBDLP258	Policy IN 1	Delivering a Sustainable Transport Network	Object	Primarily a Skerningham Objection. Local Plan does not deal adequately with pressure on roads from developments. Loss of parkland and impact on public footpaths an issue.	Footpaths would be protected or potentially rerouted if necessary. A loss of parkland can be permissible provided that adequate re-provision is provided within the vicinity. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr John Rudkin				DBDLP294	Policy IN 1	Delivering a Sustainable Transport Network	Object	Primarily a Skerningham Objection. Local Plan does not deal adequately with pressure on roads from developments. Loss of parkland and impact on public footpaths an issue.	Footpaths would be protected or potentially rerouted if necessary. A loss of parkland can be permissible provided that adequate re-provision is provided within the vicinity. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Judith Murray				DBDLP530	Policy IN 1	Delivering a Sustainable Transport Network	Object	Primarily an objection to Skerningham Strategic Allocation. Local Plan does not deal adequately with pressure on roads from developments. Loss of parkland and impact on public footpaths an issue.	Footpaths would be protected or potentially rerouted if necessary. A loss of parkland can be permissible provided that adequate re-provision is provided within the vicinity. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Ross Chisholm	Planning Officer Friends of the |Stockton and			DBDLP577	Policy IN 1	Delivering a Sustainable Transport Network	Support	Support for S&DR cycling and walking enhancements.	Support noted.	No change recommended

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	Darlington Railway									
Stockton-on-Tees Borough Council	Stockton-on-Tees Borough Council			DBDLP731	Policy IN 1	Delivering a Sustainable Transport Network	Support	Support for ongoing work to seek improvements to the strategic road network.	As part of our duty to cooperate we will continue to work with neighbouring authorities on such matters.	No change recommended
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP845	Policy IN 1	Delivering a Sustainable Transport Network	Support	Support for highway works.	Support Noted.	No change recommended
Mr Roger Fitzpatrick-Odahamier				DBDLP996	Policy IN 1	Delivering a Sustainable Transport Network	Object	Primarily a Skerningham Objection. Local Plan does not deal adequately with pressure on roads from developments. Loss of parkland and impact on public footpaths an issue.	Footpaths would be protected or potentially rerouted if necessary. A loss of parkland can be permissible provided that adequate re-provision is provided within the vicinity. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Joe Ridgeon		Mr Joe Ridgeon		DBDLP1253	Policy IN 1	Delivering a Sustainable Transport Network	Support	Support for statement on sustainable transport.	Support noted.	No change recommended
Mr David Atkinson				DBDLP1285	Policy IN 1	Delivering a Sustainable Transport Network	Neutral	Option of creating north bound slips at Junction 57 of the A1(M).	This junction is outside of the borough but it is an option that has been discussed previously with Highways England but they currently have no intention to pursue the project. We continue to engage with Highways England on strategic highways matters.	No change recommended
David Fishwick				DBDLP1284	Policy IN 1	Delivering a Sustainable Transport Network	Neutral	Alternative highway mitigations suggested.	Alternative mitigations have been considered as part of highway modelling work. Suggestions have been passed to highways for further consideration.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1354	Policy IN 1	Delivering a Sustainable Transport Network	Neutral	Broadly supported but caveated on viability.	Noted	No change recommended

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Alan Marshall	Mowden Ward Councillor			DBDLP90	10.1.2	Paragraph	Object	Objection relating to congestion and road infrastructure particularly around the Cockerton and Carmel Road Area.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Neil Minto				DBDLP823	10.1.2	Paragraph	Object	Concern over congestion and highway safety particularly around West Auckland Road, Staindrop Road and Mowden.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP957	10.1.4	Paragraph	Neutral	Efforts should be made to improve public transport connections to villages.	The council is supportive of improved public transport provision to villages however services have to operate as commercially viable routes. We continue to liaise with public transport providers.	No change recommended
Mr Steven Grabik	Architectural Liaison Officer Durham Constabulary			DBDLP757	10.1.17	Paragraph	Neutral	Good design of cycle routes.	Agree with design principles for new provision and is also covered in the existing Design of New Development SPD. Town Centre use is an existing situation that will be kept under review.	No change recommended
Mr Ross Chisholm	Planning Officer Friends of the |Stockton and Darlington Railway			DBDLP576	10.1.21	Paragraph	Support	Support for improved access to S&DR and Hurworth. Should be extended to include Piercebridge.	Support noted. Should funding be in place improvements to the Barnard Castle Trackbed (including Piercebridge) would be supported but at the moment it is not a priority. It is also stated that the list in paragraph 10.1.21 is not exhaustive. The plan will be subject to review at least every 5 years so should delivery become more likely it could be included at this point.	No change recommended
Mr Neil Minto				DBDLP828	10.1.25	Paragraph	Object	Improvements to rail services should be sought to reduce reliance on roads and road infrastructure.	Agree with the principle of supporting all sustainable transport methods as a priority but road infrastructure also needs to be improved also.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP234	10.1.26	Paragraph	Support	Support for Darlington Station and gauge enhancements on rail network.	Support noted.	No change recommended
Mr Neil				DBDLP830	10.1.27	Paragraph	Object	Considers there to be no need for additional external platforms to be created at Darlington Station as it is	Trains often have to stop some distance from the station to wait for platforms to be clear. Network Rail have identified capacity at	No change recommended

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Minto								rarely congested. Improvements to timetabling would be a more appropriate solution.	Darlington Station as an issue for a considerable time now. We will continue to engage with partners on rail transport matters.	
Mr David Phillips	Darlington Friends of the Earth			DBDLP235	10.1.38	Paragraph	Object	Concern over impacts and requirement for road infrastructure. Concern over outdated forecasts for traffic growth as based on outdated trends. The plan should be doing more to encourage sustainable transport methods and encourage people to live in the town without owning a car.	Impacts of road infrastructure will be subject to more detailed assessment in due course. The plan aims to prioritise sustainable transport throughout the plan period however some appropriate expansion of the road network will be required to support the plans growth aspirations.	No change recommended
Mr Brian Jones	Sadberge and Middleton St George Councillor			DBDLP984	10.1.41	Paragraph	Neutral	Efforts should be made to improve public transport connections to villages.	The council is supportive of improved public transport provision to villages however services have to operate as commercially viable routes. We continue to liaise with public transport providers.	No change recommended
Steve York	Sadberge and Middleton St George Councillor			DBDLP993	10.1.41	Paragraph	Neutral	Efforts should be made to improve public transport connections to villages.	The council is supportive of improved public transport provision to villages however services have to operate as commercially viable routes. We continue to liaise with public transport providers.	No change recommended
Mr Simon Nicholson				DBDLP26	10.1.49	Paragraph	Object	Concern over congestion levels on West Auckland Road particularly with new development.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Charles Johnson	Conservative Group			DBDLP152	Policy IN 2	Improving Access and Accessibility	Object	Private vehicles will remain the dominant form of transport of the foreseeable future and the plan should recognize that.	Objection noted however the NPPF (Chapter 9) requires plans to favour the use of sustainable transport methods.	No change recommended
Mr David Atkinson				DBDLP1282	Policy IN 2	Improving Access and Accessibility	Object	Concerns raised about impact of developments to the North West of Darlington on congestion. Suggested improvements are provided including electric vehicle charging points and a park and ride facility at Faverdale. Importance of a connection between Newton Lane and Staindrop Road.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Research has been undertaken previously into park and ride and this has not proved economically viable for a town the size of	No change recommended

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									Darlington with relatively abundant parking. this will be kept under review. The link between Newton Lane and Staindrop Road is a priority and is being modelled. It is reflected on the Key Diagram rather than the policies map.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1355	Policy IN 2	Improving Access and Accessibility	Neutral	No comment at this time.	Noted.	No change recommended
Mr Simon Nicholson				DBDLP 27	10.2.2	Paragraph	Support	Comment on tougher on street parking restrictions.	Comment is noted but parking restrictions are not a matter for the local plan and could be implemented by the Highway Authority if they see fit.	No change recommended
Mr Hollyer				DBDLP 193	10.2.2	Paragraph	Neutral	Where Cycle network not in place / pavement cycling causes risks for pedestrians and parked cars.	Comment is noted but parking restrictions are not a matter for the local plan and could be implemented by the Highway Authority if they see fit.	No change recommended
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP 386	10.2.3	Paragraph	Support	Impact of increased traffic on rural settlements requires greater consideration.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 898		Transport Assessments and Travel Plans	Support	Support for Transport Assessments and Travel Plans.	Support noted.	No change recommended
Charles Johnson	Conservative Group			DBDLP 153	Policy IN 3	Transport Assessments and Travel Plans	Object	Importance of cars for transport.	Objection noted however the NPPF (Chapter 9) requires plans to favour the use of sustainable transport methods.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1356	Policy IN 3	Transport Assessments and Travel Plans	Neutral	No comments at this time.	Noted.	No change recommended

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Charles Johnson	Conservative Group			DBDLP154	Policy IN 4	Parking Provision including Electric Vehicle Charging	Neutral	Importance of cars for transport.	Noted however the NPPF (Chapter 9) requires plans to favour the use of sustainable transport methods.	No change recommended
Paul Hunt	Persimmon Homes			DBDLP1203	Policy IN 4	Parking Provision including Electric Vehicle Charging	Object	Persimmon Homes object to the current wording of Policy IN4. IN4 to be amended and worded as such "Every new residential property should aim to provide, unless evidenced otherwise, an electrical socket suitable for charging electric vehicles.(60) An exemption would be made for residential apartments and residential care homes with communal parking areas".	Residential apartments may be able to provide charging points so need not be specifically excluded as there are a number of potential solutions that could be considered to help delivery. The onus would be on the developer in such circumstances to demonstrate why it is not achievable. Residential care homes could have staff vehicles that would benefit from charging points so this type of development should also not automatically be excluded.	No change recommended
Railway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP1357	Policy IN 4	Parking Provision including Electric Vehicle Charging	Neutral	No comment at this time.	Noted	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP707	Policy IN 5	Airport Safety	Support	Support.	Support noted.	No change recommended
Mr Brian Jones	Sadberge and Middleton St George Councillor			DBDLP983	Policy IN 5	Airport Safety	Object	Requesting landscape buffer to prevent coalescence of the Airport and Middleton St George.	The Airport and its surroundings are excluded from limits to development (Draft Policy H 3) which is the appropriate planning tool to prevent coalescence.	No change recommended
Doris Jones	Sadberge and Middleton St George Councillor			DBDLP956	Policy IN 5	Airport Safety	Object	Requesting landscape buffer to prevent coalescence of the Airport and Middleton St George.	The Airport and its surroundings are excluded from limits to development (Draft Policy H 3) which is the appropriate planning tool to prevent coalescence.	No change recommended
Steve York	Sadberge and Middleton St			DBDLP992	Policy IN 5	Airport Safety	Object	Requesting landscape buffer to prevent coalescence of the Airport and Middleton St George.	The Airport and its surroundings are excluded from limits to development (Draft Policy H 3)	No change recommended

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	George Councillor								which is the appropriate planning tool to prevent coalescence.	
Mr Mike Allum	Durham County Council			DBDLP 1061	Policy IN 5	Airport Safety	Support	Support for safeguarding and protection zones associated with airport.	Support noted.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1358	Policy IN 5	Airport Safety	Neutral	No comment at this time.	Noted.	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 708	Policy IN 6	Utilities Infrastructure	Support	Support for policy.	Support noted.	No change recommended
Ms Laura Roberts	Northumbrian Water			DBDLP 742	Policy IN 6	Utilities Infrastructure	Support	Support of Policy IN6 as drafted and will continue to work with the local authority to ensure sufficient service coverage.	Support noted and we will continue to work with Northumbrian Water throughout the plan development process.	No change recommended
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 846	Policy IN 6	Utilities Infrastructure	Neutral	Acknowledge that new utility provision will be required to serve the Skerningham area and will continue to work with utilities companies to ensure timely provision.	Approach welcomed and further detail will be incorporated in the infrastructure plan.	No change recommended
Marion Williams	Environment Agency			DBDLP 1291	Policy IN 6	Utilities Infrastructure	Neutral	Should consider approach to location and limiting electricity peaking plants. Policy should also be broadened to reduce existing flood risk from utilities such as sewers	Northern Powergrid already has a peaking plant working as a national demonstrator in Rise Carr area since 2017. If there may be the requirement for peaking plants to be allocated via the Local Plan process we will reconsider the need for a policy approach otherwise Policy DC 3 would offer protection to amenity. The Flood risk issues from Utilities for new development is captured in DC 4 on Flood Risk and SUDS in new developments.	No change recommended

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Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1359	Policy IN 6	Utilities Infrastructure	Neutral	No comment.	Noted.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1360	Policy IN 7	Telecommunication Masts	Neutral	No comment.	Noted.	No change recommended
Mr Fishdog Fisher				DBDLP 19	10.6.15	Paragraph	Object	Connection speeds in some existing developments are really poor.	Valid comment that upgrade did not happen everywhere in Darlington - and we look through different programmes for 100% superfast coverage by 2022 in Darlington BC	No change recommended
Gillan Gibson	Campaign to Protect Rural England (CPRE) - Darlington Group			DBDLP 712	Policy IN 8	Broadband Infrastructure	Support	Support for policy as drafted but question that the 50 house threshold is too high.	A minimum of 50 housing units for any Broadband Infrastructure provider makes a new installation commercially viable - below that external connection would have to be paid for by the developer.	No change recommended
Judith Murray				DBDLP 531	Policy IN 8	Broadband Infrastructure	Object	There are an existing broadband connectivity problems on Barmpton Lane and in Barmpton Village. These areas should be prioritised for improvement over providing connections for new development.	Barmpton Village and Barmpton Lane in Whinfield have been identified by the Council as targets for improvement in the BDUK / TVCA supported Phase 2 programme for Superfast Upgrade which should be operational by 2020. The entire Urban Barmpton Lane within Whinfield ward can receive Virgin Media Broadband via cable up to 350 mb/sec.	No change recommended
Joanne Harding	Home Builders Federation			DBDLP 807	Policy IN 8	Broadband Infrastructure	Object	Policy as drafted is considered to be unnecessary 'red tape'. Part R of building regulations should apply and it is not considered appropriate to have local standards. It is acknowledged that digital infrastructure is important but its delivery is not directly in the control of the development industry. The council should work proactively with telecommunications providers.	Part R is for connectivity within the home / this policy is related to connectivity to in the new Estate/ 50 homes make installation viable for the Broadband Infrastructure Providers / Households without connectivity cannot be sold in todays time. HBF and DCMS Openreach as well as MHCLG have further agreed ***in 2016 to include*** high speed future broadband into any new development. DCMS FUTURE TELECOMS INFRASTRUCTURE REVIEW Mar 2018. Includes guarantee full fibre connections to new build developments. The onus is now on the developer not the council. 50 new homes in Darlington is the commercially	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									feasible threshold to require Developers and Infrastructure Provider to work together. No location of this size in Darlington suggested by the Draft Local Plan is in hard to reach area to provide Superfast connectivity to Broadband.	
Amy ward	Planning Manager Barratt Homes			DBDLP 1015	Policy IN 8	Broadband Infrastructure	Object	Policy should be deleted as represents an unnecessary burden. Building regulations part R should be all that is required.	Part R is for connectivity within the home / this policy is related to connectivity to in the new Estate/ 50 homes make installation viable for the Broadband Infrastructure Providers / Households without connectivity cannot be sold in todays time. HBF and DCMS Openreach as well as MHCLG have further agreed ***in 2016 to include*** high speed future broadband into any new development. DCMS FUTURE TELECOMS INFRASTRUCTURE REVIEW Mar 2018. Includes guarantee full fibre connections to new build developments. The onus is now on the developer not the council. 50 new homes in Darlington is the commercially feasible threshold to require Developers and Infrastructure Provider to work together. No location of this size in Darlington suggested by the Draft Local Plan is in hard to reach area to provide Superfast connectivity to Broadband.	No change recommended
Mr Roger Fitzpatrick-Odahamier				DBDLP 997	Policy IN 8	Broadband Infrastructure	Object	Issue with existing connections around the Whinfield area should be sorted first.	Within the BDUK / TVCA programme Phase 2 Superfast speeds will be delivered via Barmpton Lane to the village of Barmpton by 2020. New developments will be now also required to provide connectivity based on Government policies.	No change recommended
Paul Hunt	Persimmon Homes			DBDLP 1204	Policy IN 8	Broadband Infrastructure	Object	Whilst, paragraphs 43 to 46 of the NPPF establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.	Part R is for connectivity within the home / this policy is related to connectivity to in the new Estate/ 50 homes make installation viable for the Broadband Infrastructure Providers / Households without connectivity cannot be sold in todays time. HBF and DCMS Openreach as well as MHCLG have further agreed ***in 2016 to include*** high speed future broadband into any new development. DCMS FUTURE TELECOMS INFRASTRUCTURE REVIEW Mar 2018. Includes guarantee full fibre connections to new build developments. The onus is now on the developer not the council. 50 new homes in Darlington is the commercially feasible threshold to require Developers and	No change recommended

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									Infrastructure Provider to work together. No location of this size in Darlington suggested by the Draft Local Plan is in hard to reach area to provide Superfast connectivity to Broadband.	
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1125	Policy IN 8	Broadband Infrastructure	Neutral	Policy over the top and too arduous	Part R is for connectivity within the home / this policy is related to connectivity to in the new Estate/ 50 homes make installation viable for the Broadband Infrastructure Providers / Households without connectivity cannot be sold in todays time. HBF and DCMS Openreach as well as MHCLG have further agreed ***in 2016 to include*** high speed future broadband into any new development. DCMS FUTURE TELECOMS INFRASTRUCTURE REVIEW Mar 2018. Includes guarantee full fibre connections to new build developments. The onus is now on the developer not the council. 50 new homes in Darlington is the commercially feasible threshold to require Developers and Infrastructure Provider to work together. No location of this size in Darlington suggested by the Draft Local Plan is in hard to reach area to provide Superfast connectivity to Broadband.	No change recommended
Taylor Wimpey UK Ltd		Steven Longstaff		DBDLP 1246	Policy IN 8	Broadband Infrastructure	Object	Policy should be removed as it represents an unnecessary technical standard.	Part R is for connectivity within the home / this policy is related to connectivity to in the new Estate/ 50 homes make installation viable for the Broadband Infrastructure Providers / Households without connectivity cannot be sold in todays time. HBF and DCMS Openreach as well as MHCLG have further agreed ***in 2016 to include*** high speed future broadband into any new development. DCMS FUTURE TELECOMS INFRASTRUCTURE REVIEW Mar 2018. Includes guarantee full fibre connections to new build developments. The onus is now on the developer not the council. 50 new homes in Darlington is the commercially feasible threshold to require Developers and Infrastructure Provider to work together. No location of this size in Darlington suggested by the Draft Local Plan is in hard to reach area to provide Superfast connectivity to Broadband.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner	DBDLP 1361	Policy IN 8	Broadband Infrastructure	Neutral	No comments.	N/A	No change recommended

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			Barton Willmore							
Mr Geoffrey Crute	Councillor Neasham Parish Council			DBDLP 384	10.6.18	Paragraph	Neutral	Existing service to parts of Neasham Parish poor or none existent. Requirement should not only apply to new development but improving existing coverage.	Phase 2 of the BDUK programme by TVCA will be rolled out by 2020 and will cover solutions for existing rural areas and gaps such as Neasham. This policy is for new builds and in some places such as Hurworth might help surrounding rural areas	No change recommended
Mr Timothy Crawshaw	Built and Natural Environment Manager Darlington Borough Council / Healthy New Towns			DBDLP 703	Policy IN 9	Renewable and Energy Efficient Infrastructure	Neutral	Needs to have a criteria based approach that assess wind power potential (NP too restrictive as a criteria) Major developments over 300 should have DH integration secured at Outline stage and taking into account cumulative applications in the same area or neighbourhood. Viability testing (open book) required.	Comments noted for outline stages and the issue of viability testing required.	No change recommended
Mr Neil Westwick	Senior Director Skerningham Estates Ltd	Mr Neil Westwick	Skerningham Estates Ltd	DBDLP 847	Policy IN 9	Renewable and Energy Efficient Infrastructure	Object	Objection for major development of over 300 require looking at District heating. It should be made clear that connection to a district heating system is not a policy requirement. Alternative wording for the policy has been suggested.	Ambition for development of over 300 when numbers get economically viable to at least consider district heating and outline / demonstrate that scheme for their site is not viable or feasible. Suggested alternative text by developer does not reflect councils ambition to prove that district heating is not feasible.	No change recommended
Paul Hunt	Persimmon Homes			DBDLP 1206	Policy IN 9	Renewable and Energy Efficient Infrastructure	Object	Object to the inclusion of District Heating. It is noted there is no national requirement for District Heating Systems to be provided for large scale development. It does not appear that the financial implications of this requirement have been fully assessed in the anticipated viability assessment. Accordingly Persimmon Homes suggest that IN9 d is deleted or amended such that district heating shall only be promoted rather than required.	Ambition for development of over 300 when numbers get economically viable to at least consider district heating and outline / demonstrate that scheme for their site is not viable or feasible.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Marion Williams	Environment Agency			DBDLP1273	Policy IN 9	Renewable and Energy Efficient Infrastructure	Neutral	District heating should be implemented through planning condition.	Comments noted in regards of planning condition but a feasibility test by the developer for District Heating should come first before any planning condition can be attached	No change recommended
Marion Williams	Environment Agency			DBDLP1292	Policy IN 9	Renewable and Energy Efficient Infrastructure	Neutral	Other pollutants not just carbon should be targeted. Peaking plants would benefit from a policy.	There are a number of policies in the Draft Local Plan which seek to influence the location, form and design of new development in order to minimise its impact on different forms of pollution. All new development will be required to adhere to relevant national standards on construction, materials, energy efficiency of building and water use. The Sustainability Appraisal which informed the Council's decisions on site selection also considered the potential for noise, vibration, odour and light pollution resulting from different site options, seeking to avoid locations that would be more susceptible. New development will have an impact on greenhouse gas emissions (e.g. through the use of energy and vehicle emissions) but the Draft Local Plan seeks to minimise this through its locational strategy and a number of complimentary policy requirements. The strategy looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. In terms of peaking plans Darlington has one of the most advanced peaking plants via battery storage by Northern Powergrid installed at its Rise Carr site since 2017. It will be mentioned in the Infrastructure Development Plan as "consumer demand led options of network development" We are not aware of any intention for locating peaking plants but we will continue to engage with Northern Powergrid in preparing an infrastructure plan.	No change recommended

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Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1321	Policy IN 9	Renewable and Energy Efficient Infrastructure	Object	It is considered there is a lack of clarity over the 'enabled' requirement for district heating. Causes concerns over deliverability of the actual heating system and viability of schemes.	Comments noted: enabled means to include the whole infrastructure system into the build (this includes the large centralised energy centre which houses renewable technologies (such as CHP engines/ biomass boilers, heat pumps) lateral pipeworks to each property which can provide higher efficiencies and better pollution control. the system of District Heating can be included in the viability options and should at least be tested by developers commercially. Public sector organisation find the District Heating option very viable and district heating networks in the Tees Valley are created.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1362	Policy IN 9	Renewable and Energy Efficient Infrastructure	Neutral	No comments.	N/A	No change recommended
Ms Jane Nixon				DBDLP 329		Community and Social Infrastructure	Object	Impact on education and emergency services of new population.	The planning authority continue to work with the Local Education Authority to forecast demand for school places. Developer Contributions will be sought from developments that are close to capacity which will be used to fund additional provision either at existing schools or on new sites where appropriate. Emergency services have been consulted as part of this consultation so are aware of the amount and locations of proposed new development over the next 20 years.	No change recommended
Mr Tim Ellis				DBDLP 85	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Objection to selling leisure facilities to build more housing.	The merger of Stressholme and Blackwell Golf Clubs was necessary to retain a golf club facility in the area amid difficult financial conditions. There was no place in the market for two clubs in such close proximity so merger was beneficial. Strategic new development will include new provision for an increasing population.	No change recommended
Dave McGuire	Sport England (North East)			DBDLP 106	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Support	Support for policy as drafted.	Support noted.	No change recommended

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Charles Johnson	Conservative Group			DBDLP155	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Infrastructure should have more emphasis.	Infrastructure is integral to the plan and when submitted as part of the evidence base will be an infrastructure delivery plan.	No change recommended
Mr Ross Chisholm	Planning Issues Contact Campaign for Real Ale Darlington Branch / Friends of Stockton and Darlington Railway			DBDLP308	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Support	General support for Policy IN 10 as drafted but seeking clarification if 'local communities' extends to the main urban area as well as villages. Durhams policy approach to 'last pub' recommended.	Defining local communities within urban areas prove difficult to define and often subjective. Drinking establishments will continue to be considered acceptable uses in principle within the Town Centre and District/Local Centres within the main urban area. We therefore do not consider it necessary to extend this protection to the main urban area of Darlington.	No change recommended
Patricia Newton				DBDLP498	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Increased pressure on local services (including health and education) as a result of additional development.	The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding. Education capacity is to be kept under review throughout the plan period. Developers will be expected to make financial contributions in areas where there is insufficient capacity and certain sites are to safeguard land to enable the delivery of new schools.	No change recommended
Paul Littleton				DBDLP509	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Increased pressure on local services and education as a result of additional development.	Education capacity is to be kept under review throughout the plan period. Developers will be expected to make financial contributions in areas where there is insufficient capacity and certain sites are to safeguard land to enable the delivery of new schools.	No change recommended
Mr Steven	Architectural Liaison Officer			DBDLP1098	Policy IN 10	Supporting the Delivery of Community	Neutral	Advising that owing to our high concentrations we should consider having a policy for Childrens Care	If change of use is required for a proposal then a range of policies would apply within the plan to refuse proposals in unacceptable	No change recommended

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Drabik	Durham Constabulary					and Social Infrastructure		Homes and Residential Institutions. It is suggested the Durham's policy would be an appropriate approach.	locations. These policies would include: DC1 - Sustainable design Principles, DC2 - Health and Wellbeing, DC3 - Safeguarding Amenity, H8 - Housing Intensification, IN2 - Improving Access and Accessibility and IN 4 Parking Provision.	
Mr Mike Allum	Durham County Council			DBDLP 1058	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Support	Support for Policy IN 10 as drafted. It is acknowledged that there will need to be ongoing discussions between education departments where sites may be located closest to a school in the respective authorities.	Support noted and education authorities will continue to liaise with each other.	No change recommended
Paul Hurst	Persimmon Homes			DBDLP 1208	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Object to the requirement for safeguarded land to be made available for alternative community uses in the event no firm plans for a school are in place by the given trigger point. Also Education should be considered on a borough wide basis.	The policy wording still allows for the land to be used for residential use should another community use not be required final triggers would be agreed on a case by case basis. Although Darlington does not operate on catchment areas there are still statutory suitable walking distances set out in DfE guidance that are applicable and that is what the criteria have been based on.	No change recommended
N/A Darlington Farmers Auction Mart N/A		Mr Christopher Martin	WYG	DBDLP 1126	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Neutral	Content and structure of policy is considered unnecessarily complicated and would be better in an SPD to allow periodic updating.	The policy is worded as simply as possible and we have had no other comments to the contrary. in relation to review it is acknowledged the figures will change which is why the formula sets out where the information will be sourced and these figures will be updated annually either by DfE or the council respectively. The plan will require review every 5 years and it is unlikely SPD's would be reviewed much more frequently than that.	No change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1322	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Object	Methodology of developer contributions model towards education questioned. Further explanation as to the inputs requested.	The calculation set out in the policy is in line with a recent DfE consultation on developer contributions for education. https://www.gov.uk/government/consultations/supporting-housing-delivery-through-developer-contributions	No change recommended

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									The figures used in the calculation reflect the following: • Pupil yield factor generated by the development (TVC projections), • Available capacity/deficit of places at the relevant school (Provided in the LEA annual school placement plan), and • DfE place generation figure (nationally agreed figure for new education provision). This calculation is much more straightforward than the process previously involved in the Councils Planning Obligations SPD (which it would replace) and enables figures to adjust for changes in capacities and costs.	
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1363	Policy IN 10	Supporting the Delivery of Community and Social Infrastructure	Neutral	No comment at this time.	N/A	No change recommended
ms yvonne richardson				DBDLP 22	10.7.19	Paragraph	Object	Concerns regarding the loss of the community and heritage value of the library in Crown Street. Commented that the Council's decision to close the library should be reversed.	It has been announced that the library will remain at Crown Street. Further details can be found in the Cabinet report dated 11 September 2018.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 899	11	MONITORING	Support	AMR and Local Plan indicator monitoring supported and monitoring of some crucial policies is recommended and HE should be consulted	Support noted	No change recommended
Mr John Fleming	Gladman Developments			DBDLP 1091	11	MONITORING	Neutral	Comments noted and importance to effectiveness of the plan. There is no policy mechanism included within the Plan to ensure that any potential housing shortfall will be addressed as quickly as possible a suggestion has been given.	The AMR will identify pressure on the plan delivery and will indicate how successful policies are being. Pressures such as those mentioned in NW Leicestershire are unlikely to be encountered in Darlington.	No change recommended

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Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1323	11	MONITORING	Object	Identified significant concerns with the means of monitoring 5 year housing land supply within these representations,and objected to the measure being against the 422 minimum requirement figure. The 5 year supply review mechanism must to enshrined in future policy and be consistent with the plan objective	Monitoring of those issues and others will be provide in the Submission Draft	No change recommended
Irene Ord	Listed Property Owner			DBDLP 865	11.0.1	Paragraph	Neutral	Local List of Historic Asset are the records being scrutinised before submission and who conducts the impact assessment. Balance of historic and environmental assets and development need to be ensured at Planning Committee.	Comments noted: DBC Conservation Officer and Historic England will update the asset list and will assess and scrutinise subsequent impact assessment.	No change recommended
Amy ward	Planning Manager Barratt Homes			DBDLP 1006	APPENDIX A	HOUSING TRAJECTORY	Object	Comments and concerns raised: • Council to review commitments to ensure still deliverable, whether there is a house builder on board and whether there are any constraints preventing development coming forward. • Apply 20% lapse rate to existing commitments. • Sites with no permission or outline permission must be supported by clear evidence that housing completions will being on site within 5 years. • Increase housing requirement to account for this and provide further flexibility in the Plan. • Review proposed delivery of site allocations as set out in the housing trajectory	Comments noted. Substantial evidence base work has been undertaken to date to ensure the commitments and proposed allocations in the plan are deliverable. Consideration has been given to developer interest and physical site constraints. A Local Plan Viability Assessment is being prepared, this will ensure that allocations are deliverable when taking into account planning obligations which are set out in the plan. In view of this it has not been considered necessary to apply a 20% lapse rate to commitments. It is considered appropriate to have a number of the proposed allocations within the five year supply as there is clear evidence to support that these sites will be delivered within the five year period. A Court of Appeal decision confirmed that planning permission is not required for a site to be realistically deliverable over the next five years and sites which are allocated in an emerging local plan can be suitable for inclusion in the supply figures. The likelihood that an authority will grant some planning	No change recommended.

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								• Push all sites without planning permission outside of 5YLS. • Ensure potential allocations deliverable in light of policy obligations in Local Plan. • Allocate more sites to come forward in 5 years or justify potential allocations will deliver in 5 years. • Amend the trajectory to reflect an average build out rate of 35 houses per annum. • Apply a 20% buffer to the overall housing requirement	permissions during the period was acknowledged in this decision. There is a flexibility of sites in the plan which provides a buffer over the housing target. Taking into account the completions recorded for the first three years of the plan period there is sufficient land to provide a buffer of 16% above the remaining housing target figure. There is also sufficient land to deliver an additional 5,700 (approx) dwellings beyond the plan period, post 2036. A contribution from windfall sites, small sites and brownfield regeneration sites within the main urban area have not been included in the supply and create additional flexibility. The housing trajectory has an average build out rate of 30 dwellings per annum on most sites. This has been increased where there is known to be more than one builder developing a site or more than one builder with an interest in a site.	
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP 1171	APPENDIX A	HOUSING TRAJECTORY	Object	Site 392 'Elm Tree Farm' is capable of being delivered in the short term as outlined on the housing trajectory. It should be recognised that 'indicative site yields' are not upper limits and a flexible approach should be allowed due to the 'historic low supply of housing delivery in the Borough'.	Comments noted. Policy H 2 Housing Allocations states that yields identified are for indicative purposes only and the final number of homes to be delivered on site will be determined by the planning application process. Paragraph 6.2.1 also confirms that housing trajectory is an estimate and does not place phasing restrictions on sites.	No change recommended.
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1412	APPENDIX A	HOUSING TRAJECTORY	Object	Concerns raised with the assumed delivery rate for Faverdale and doubts that the site will deliver 810 homes by 2036. No evidence of an application becoming forthcoming, no known developer commitment and significant infrastructure requirements for the scheme. Multiple outlets rarely results in a simple doubling of outputs. The plan places too much reliance on the delivery of large strategic sites to achieve housing numbers.	The Council has been and is continuing to engage with the main landowner and developer at Faverdale, in order to identify all of the constraints and opportunities involved, and to prepare a masterplan for the area. A substantial amount of work has been undertaken by the landowner on the site, including but not limited to a masterplan framework, heritage assessment, archaeology assessment, ecology surveys and report, flood risk assessment, landscape assessment, highways assessment and utilities assessment. A visioning document and delivery strategy have also been prepared to support the masterplan. A pre-application enquiry has also been submitted to the Council and discussions	No change recommended

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									are ongoing. Evidence on the anticipated delivery rates of the site has been obtained from developers and it is expected that there will be multiple house builders on the site. Despite this, delivery for this site over the plan period has been reduced for the next stage of plan preparation given latest information. It is considered that the estimated delivery in the trajectory is appropriate, allowing for suitable lead in times. A range of sites are proposed for allocation to meet housing needs. Paragraph 72 of the NPPF (2019) also supports the Council's approach in allocating large urban extensions as it states, "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." Allocating large strategic sites rather than a number of smaller sites also ensures that the area is planned as a single cohesive sustainable development fully supported by the necessary infrastructure.	
Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP 1410	APPENDIX A	HOUSING TRAJECTORY	Object	Skerningham Strategic Allocation can deliver housing completions within the next five years. There are early phases of development that can provide enabling infrastructure without prejudicing the wider masterplanning of the area. Banks Property request that land to the East of Beaumont Hill is included as its own site as per our comments on Policy H2 with housing completions programmed from 2021 at a rate of 30 per annum rising to 50 per annum from 2024. Site proposed at School Aycliffe for allocation	It is acknowledged that Banks Property are committed to bringing forward a development which complies with policy H 10 and the Skerningham Masterplan Framework. It is however not considered appropriate to create a stand alone housing proposal with its own red line boundary for the site proposed as Banks Property have been involved in the masterplanning process from the start and the land is critical to the delivery of the wider masterplan area with regards to highway infrastructure. A separate site could also lead to the fragmentation of the masterplan area and the strategic allocation. There is nothing to prevent distinct parts of the site coming forward in advance of others provided that they adhere with the masterplan and deliver the necessary	No change recommended.

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								Site 95 Beech Crescent East - site yield should be increased to 30 dwellings and delivery to begin in 2020.	infrastructure to support development as set out in Policy H10. The Elm Tree Farm site is different in that the landowners/developers have not been involved in the masterplanning process and the site is subject to a current planning application. Although it has been emphasised with the landowners/developers that any application at Elm Tree Farm would have to be well integrated with the masterplan area and accord with the principles set out in Policy H 10. Please see officer response to policy H 2 ref DBDLP870 on alternative site proposed. It is considered that the yield for site 95 Beech Crescent East, Heighington is appropriate. The yield is lower than the standard density multiplier in the HELAA due to site constraints - site shape and location adjacent to the bypass. No evidence has been submitted to justify the higher yield other than referring to the adjacent site which has a different context. Reference has been made to a higher figure in the HELAA however this was a drafting error. It is not considered appropriate to estimate delivery starting on this site from 2020 as planning permission is still required. It is important to note that the site yields are indicative and will be finalised at the planning application stage. The housing trajectory does not place any phasing restrictions on the sites and they may come forward sooner than indicated.	
Mr Christopher Bell	Highways England			DBDLP901		Site 3 - South of Burtree Lane	Object	Site of possible concern to Highways England with potential impact on the A1 at Junctions 58 and 59 and the A66 at Little Burdon.	The council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Amy ward	Planning Manager			DBDLP1012		Site 3 - South of Burtree Lane	Support	Supported for the proposed allocation is reiterated on the following grounds:	Support is noted for the promoted site and additional detailed consideration and assessment	No change recommended

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	Barratt Homes							• Sustainability • No heritage impacts • Not within a flood zone • Not Subject to other environmental designations • No indication form initial surveys of protected species. • No adverse impact on highways.	will take place throughout the planning process.	
Mr Christopher Bell	Highways England			DBDLP 902		Site 8 - Berrymead Farm	Object	Site of possible concern to Highways England with potential impact on the A1 at Junctions 58 and 59 and the A66 at Little Burdon.	The council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 903		Site 20 - Great Burdon	Object	Site of concern to Highways England owing to the significant number of dwellings located within close proximity to the A66.	The council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 1390		Site 20 - Great Burdon	Object	Darlington Friends of the Earth object to the allocation of Great Burdon. Concerns raised: • Increase in traffic congestion and degradation of air quality. • Building on a flood plain. • Green policy and outputs are not clear. Green infrastructure buffer zone should be at least 100m from the River Skerne. • It is not clear that the Highways Authority Traffic	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Impacts of air pollution have been considered via the sustainability appraisal process. There are a number of planning policies in the Draft Local Plan which aim to prevent new development from contributing to unacceptable levels of air pollution. For example DC 1 (Sustainable Design Principles) requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption and how buildings have been made energy efficient thereby reducing carbon emissions. The locational strategy of Draft Local Plan also	No change recommended.

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								Modelling justifies the housing allocation.	looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). The statement for the site within Appendix B also sets out that a part of the site is within flood zone 2 and 3 and that development should be directed away from this area. The statement for the site in Appendix B sets out that the Skerne corridor along the western boundary should be protected and enhanced including significant new green infrastructure provision. The environment chapter and associated policies, of the Draft Local Plan also set out general requirements on developments with regards to green infrastructure and biodiversity.	
Marion Williams	Environment Agency			DBDLP 1293		Site 20 - Great Burdon	Neutral	The Environment Agency are keen to work with developers on the Great Burdon site on enhancement of the River Skerne to achieve Water Framework Directive objectives.	Collaborative approach to working noted and welcomed.	No change recommended
Bellway Homes Ltd		Rachel Gillen	Senior Planner Barton Willmore	DBDLP 1364		Site 20 - Great Burdon	Support	Supported for the proposed allocation is reiterated on the following grounds: • Access to the site and existing transport infrastructure is good. • Aiming to provide net gains for nature conservation. • The development would be designed to respond to the site and surrounding landscape.	Support is noted for the promoted site and additional detailed consideration and assessment will take place throughout the planning process.	No change recommended

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								• Flood risk can be mitigated and will integrate SUDS. • Existing archaeological assessment indicates a low potential for archaeological finds. • Noise (mainly from the A66) could be mitigated.		
Hellworth				DBDLP 493		Site 41 - South Coniscliffe Park	Object	As part of combined objection to Sites 100, 249 and 41. Objection is raised on the grounds of impact on services including sport, health and education. Impact on highways congestion particularly around Cockerton are also of concern.	A number of sites within the area including West Park and North Coniscliffe Park will reserve land to enable the future provision of education facilities. Additional sports provision is also part of the West Park Garden Village Masterplan. Funding will be sought via developer contributions. The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mrs C Everington				DBDLP 563		Site 41 - South Coniscliffe Park	Object	Objection raised on the grounds of loss of green space.	There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is	No change recommended

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									sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development.	
Mr Christopher Bell	Highways England			DBDLP 904		Site 41 - South Coniscliffe Park	Object	Site of concern to Highways England with potential impact on the A1 at Junctions 58 and 59 and the A66 at Blands Corner.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr David Phillips	Darlington Friends of the Earth			DBDLP 1389		Site 41 - South Coniscliffe Park	Object	Objection to Coniscliffe Park. Concerns raised. • Not a sustainable site. • Increase in traffic congestion and degradation of air quality. • Should not be building on a flood plain. • Green policy and outputs are not clear. • Green infrastructure buffer zone should be at least 100m from Baydale Beck. • It is not clear that the Highways Authority Traffic Modelling justifies the housing allocation or the provision of new roads.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Impacts of air pollution have been considered via the sustainability appraisal process. There are a number of planning policies in the Draft Local Plan which aim to prevent new development from contributing to unacceptable levels of air pollution. For example DC 1 (Sustainable Design Principles) requires developments to demonstrate that the layout,	No changes recommended.

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									orientation and design of buildings helps to reduce the need for energy consumption and how buildings have been made energy efficient thereby reducing carbon emissions. The locational strategy of Draft Local Plan also looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). The statement for the site within Appendix B also sets out that a small part of the site is within flood zone 2 and 3 and that development should be directed away from this area. The statement for the site in Appendix B sets out that Baydale Beck and wildlife friendly open space runs along the eastern boundary of the site and this part of the green infrastructure network should be protected and enhanced. The environment chapter and associated policies, of the Draft Local Plan also set out general requirements on developments with regards to green infrastructure and biodiversity.	
Mr Ken Maddison				DBDLP 1405		Site 41 - South Coniscliffe Park	Object	Objection raised to Coniscliffe Park development on the following grounds: • Other areas should be fully developed before new areas are considered, particularly brownfield land. The site on Whessoe road is mentioned as an example of a site that should be brought forward for development before greenfield sites. • Proximity to Water Treatment Works and Chlorine store.	There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe	No change recommended

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								• Impact on traffic congestion particularly around Cockerton and the Woodland Road roundabouts. • Flooding concerns from Baydale Beck. • Presence of strategic water mains. • Impact on ecology particularly on open farmland and Merrybent Community Woodland.	regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development. Constraints around the proximity to the Waste Water Treatment Works, mains sewers and flood risk are known and will have to be adequately mitigated within the design of the scheme in due course. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. The sites proposed in the local plan have been selected to minimise impacts on biodiversity. For more information on the assessment of the biodiversity of sites see the relevant site assessment in the Sustainability Appraisal. Where necessary, appropriate mitigation will be required. Prior to granting planning permission further assessment work would be required to establish the likely presence of protected species. The presence of protected species would require developers to obtain a licence before development could commence. Developers would also have to submit a Phase II Habitat Survey with any planning application for development. The Phase II Survey aims to establish the size of populations of the protected species, to maintain conservation status and ensure that no statutory offence is committed during site development. National policy also requires development to demonstrate net gains to biodiversity. Merrybent Community Woodland has been proposed as a Local Green Space within the Local Plan and therefore offered greater protection.	

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Hallworth				DBDLP 491		Site 100 - Hall Farm, Branksome	Object	As part of combined objection to Sites 100, 249 and 41. Objection is raised on the grounds of impact on services including sport, health and education. Impact on highways congestion particularly around Cockerton are also of concern.	A number of sites within the area including West Park and North Coniscliffe Park will reserve land to enable the future provision of education facilities. Additional sports provision is also part of the West Park Garden Village Masterplan. Funding will be sought via developer contributions. The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher Bell	Highways England			DBDLP 905		Site 100 - Hall Farm, Branksome	Object	Site of possible concern to Highways England with potential impact on the A1(M) at Junction 58.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
	Church Commissioners for England (CCE)	Ms Lucie Jowett	Barton Willmore	DBDLP 1162		Site 100 - Hall Farm, Branksome	Support	Supported for the proposed allocation is reiterated on the following grounds: • The site is located in a sustainable location near to a number of existing local facilities and services. • Close proximity to existing public transport and offers the opportunity for further improvement.	Support is noted for the promoted site and additional detailed consideration and assessment will take place throughout the planning process.	No change recommended

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								• Opportunities to promote sustainable linkages to footpaths, cycleways and the PROW network. • The agricultural land is considered to be of low ecological value. • The majority of the site is not at risk of flooding. • No heritage assets within the boundary although there are some assets within the wider vicinity. • Some existing utilities infrastructure including overhead power lines may need further consideration. An indicative masterplan has been submitted to support the proposed application.		
Mr Christopher Bell	Highways England			DBDLP907		Site 243 - Snipe Lane, Hurworth Moor	Object	Site of concern to Highways England with potential impact on the A66/A67/A167.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
N/A Darlington Farmers Auction Mart N/A		Mr Joe Ridgeon		DBDLP1371		Site 243 - Snipe Lane, Hurworth Moor	Support	DFAM supports the Draft Local Plan and strongly supports Policy H2 – Housing Allocation, Site ref. 243 – Snipe Lane, Hurworth Moor. The proposed allocation includes 21.94 hectares of land in DFAM's control (Appendix 1). However, DFAM have further land to the south of the A66 which would also be suitable for development. The site is a sustainable location for development and will provide many benefits:	Support noted. With regards to the alternative sites proposed please see officer response to policy H 2 ref DBDLP1127.	No change recommended

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								Economic • House building will boost the local economy and help to attract business. • Boost support for local services. • House building results in job creation and training opportunities. • Expenditure associated with moving house. • New homes bonus payments. Social • The site is well located and in close proximity to a wide range of shops, essential services and leisure facilities. • House building will sustain the existing community. • Provide a mix of housing stock to meet needs. Environmental • The site is in accessible and sustainable location close to public transport services. • Surveys undertaken with regard to the biodiversity, ground conditions and service water drainage so impacts can be mitigated. • Modern, sustainable construction will be adhered to.		

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Nick McLellan	Story Homes	Alastair Willis	Technical Director (Planning) Stephenson Halliday	DBDLP 1311		Site 243 - Snipe Lane, Hurworth Moor	Object	Part of wider response logged against Policy H 2. Issues raised with suggested delivery rate and yield being too ambitious on site 243 Snipe Lane, Hurworth Moor. Overall numbers are high and the start date seems ambitious with no application being imminent. Density proposed also seems too high.	The site is in Council ownership and delivery is to be pursued quickly on the site. There will be more than one house builder on site, the Council being one, therefore higher rates of delivery are justified. The site yield and potential start for delivery has been adjust for the Proposed Submission Draft of the Local Plan to reflect latest information. The yield has been reduced and delivery estimated to commence later in the plan period.	No change recommended.
Mr Anthony Scarre				DBDLP 33		Site 249 - Coniscliffe Park, North	Object	Objection raised on the grounds that development of the site would change the semi rural character of the area. It is also used as an area for leisure activities by a large number of local residents including walking, cycling and running. Wildlife habitats will also be lost.	It is acknowledged that development will result in a loss agricultural land and that the character of the area will be altered. In order to fulfil the council's housing requirement this has inevitably required the allocation of green field sites for development. There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop, as such their deliverability is sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. Therefore there is not an over reliance on these sites in the Draft Local Plan and for these reasons the Town Centre Fringe regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development. The sites proposed in the local plan have been selected to minimise landscape impacts and are typically constrained by existing features such as roads and rivers. For more information on the assessment of landscape consideration of sites see the relevant site assessment in the Sustainability Appraisal. Where necessary, appropriate landscape mitigation will be	No change recommended

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									required. Impact on landscape character will be assessed further through the planning application process and will need to take into account the Darlington Landscape Character Assessment.	
Hallworth				DBDLP 492		Site 249 - Coniscliffe Park, North	Object	As part of combined objection to Sites 100, 249 and 41. Objection is raised on the grounds of impact on services including sport, health and education. Impact on highways congestion particularly around Cockerton are also of concern.	A number of sites within the area including West Park and North Coniscliffe Park will reserve land to enable the future provision of education facilities. Additional sports provision is also part of the West Park Garden Village Masterplan. Funding will be sought via developer contributions. The provision of new heath facilities including GP's is an area where planning has limited influence. The local authority continues to work with the Clinical Commissioning Group (CCG) and other partners to identify challenges facing the borough in terms of improving health and providing sufficient services for residents of the borough. The local plan looks to safeguard land in key growth zones however delivery of new facilities will be dependent on NHS/private funding. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mrs C Everington				DBDLP 564		Site 249 - Coniscliffe Park, North	Object	Coniscliffe Park and Skerningham would result in loss of greenfield.	It is acknowledged that development will result in a loss agricultural land and that the character of the area will be altered. In order to fulfil the council's housing requirement this has inevitably required the allocation of green field sites for development. There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable. Local Plan's which	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development.	
Mr Christopher Bell	Highways England			DBDLP 908		Site 249 - Coniscliffe Park, North	Object	Site of concern to Highways England with potential impact on the A1(M) at Junctions 58 and the A66.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr John Fleming	Gladman Developments			DBDLP 1092		Site 249 - Coniscliffe Park, North	Support	Supported for the proposed allocation is reiterated on the following grounds: • Site will offer a range of services including land for a school, sports pitches, open space and local convenience retail. • Deliver a local distributor road between Staindrop Road and Consicliffe Road. Documents submitted with the planning applications demonstrate how this proposal would represent sustainable development and that the site is available, suitable and deliverable. There are no technical constraints which would preclude its delivery.	Support is noted for the promoted site and additional detailed consideration and assessment will take place throughout the planning process.	No change recommended
Mr David	Darlington Friends of the Earth			DBDLP 1388		Site 249 - Coniscliffe Park, North	Object	Objection to Coniscliffe Park. Concerns raised.	The Draft Local Plan has proposed allocations which the Council considers to be the most suitable and sustainable for housing development over the plan period. Site selection	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Phillips								• Not a sustainable site. • Increase in traffic congestion and degradation of air quality. • Should not be building on a flood plain. • Green policy and outputs are not clear. • Green infrastructure buffer zone should be at least 100m from Baydale Beck. • It is not clear that the Highways Authority Traffic Modelling justifies the housing allocation or the provision of new roads.	has been informed by detailed site assessments within the Housing and Employment Land Availability Assessment and Sustainability Appraisal (available on the Council's website). The locational strategy for the proposed allocations is focused within the main urban area, as urban extensions and at the larger service villages. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. Impacts of air pollution have been considered via the sustainability appraisal process. There are a number of planning policies in the Draft Local Plan which aim to prevent new development from contributing to unacceptable levels of air pollution. For example DC 1 (Sustainable Design Principles) requires developments to demonstrate that the layout, orientation and design of buildings helps to reduce the need for energy consumption and how buildings have been made energy efficient thereby reducing carbon emissions. The locational strategy of Draft Local Plan also looks to locate development in sustainable locations reducing the need to travel to access services, facilities and employment, maximising opportunities for people to use sustainable methods of travel, consequently reducing emissions from private vehicles. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). The statement for the site within Appendix B also sets out that a small part of the site is within flood zone 2 and 3 and that development should be directed away from this area. The statement for the site in Appendix B sets out that Baydale Beck and wildlife friendly	

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									open space runs along the eastern boundary of the site and this part of the green infrastructure network should be protected and enhanced. The environment chapter and associated policies, of the Draft Local Plan also set out general requirements on developments with regards to green infrastructure and biodiversity.	
M K Maddison				DBDLP 1366		Site 249 - Coniscliffe Park, North	Object	Objection raised to Coniscliffe Park development on the following grounds: • Other areas should be fully developed before new areas are considered, particularly brownfield land. The site on Whessoe road is mentioned as an example of a site that should be brought forward for development before greenfield sites. • Proximity to Water Treatment Works and Chlorine store. • Impact on traffic congestion particularly around Cockerton and the Woodland Road roundabouts. • Flooding concerns from Baydale Beck. • Presence of strategic water mains. • Impact on ecology particularly on open farmland and Merrybent Community Woodland.	It is acknowledged that development will result in a loss agricultural land and that the character of the area will be altered. In order to fulfil the council's housing requirement this has inevitably required the allocation of green field sites for development. There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development. Constraints around the proximity to the Waste Water Treatment Works, mains sewers and flood risk are known and will have to be adequately mitigated within the design of the scheme in due course. Transport modelling work is ongoing to test highway mitigation schemes to ensure	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									developments do not have an unacceptable impact on local and strategic highway network. The sites proposed in the local plan have been selected to minimise impacts on biodiversity. For more information on the assessment of the biodiversity of sites see the relevant site assessment in the Sustainability Appraisal. Where necessary, appropriate mitigation will be required. Prior to granting planning permission further assessment work would be required to establish the likely presence of protected species. The presence of protected species would require developers to obtain a licence before development could commence. Developers would also have to submit a Phase II Habitat Survey with any planning application for development. The Phase II Survey aims to establish the size of populations of the protected species, to maintain conservation status and ensure that no statutory offence is committed during site development. National policy also requires development to demonstrate net gains to biodiversity. Merrybent Community Woodland has been proposed as a Local Green Space within the Local Plan and therefore offered greater protection. New development will be focused in areas of low flood risk (Flood Zone 1) and should adhere to the requirements of policy DC 4 (Flood Risk & Sustainable Drainage Systems). The statement for the site within Appendix B also sets out that a small part of the site is within flood zone 2 and 3 and that development should be directed away from this area.	
Mr Ken Maddison				DBDLP 1368		Site 249 - Coniscliffe Park, North	Object	Copy of previous objection to application 17/00636/OUT submitted. Primarily objecting to: • loss of greenfield	It is acknowledged that development will result in a loss agricultural land and that the character of the area will be altered. In order to fulfil the council's housing requirement this has inevitably required the allocation of green field sites for development. There are a number of brownfield sites proposed for allocation in the	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
								• lack of need • conflict with existing policies	Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development. Please see officer response on housing requirement and standard method. Policies in existing and saved plans would be replaced by the local plan when adopted.	
Mr M Gardner				DBDLP190		Site 392 - Elm Tree Farm	Object	Objection is raised on the grounds of increased traffic, particularly on Sparrowhall Drive and Winbush Way. This additional traffic could also have safety implications for pedestrians crossing and already busy road. An increase in traffic will also lead to an increase in pollution. Town Centre and brownfield sites would be preferable to greenfield sites. Loss of green space would result in negative impacts on mental and physical health as well as ecology.	Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network. There are a number of brownfield sites proposed for allocation in the Draft Local Plan and the Council is supportive of development on brownfield land. The Local Plan does however have to be deliverable and if there are doubts that a site will come forward over the plan period it should not be included or relied upon in the plan to meet housing needs. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable. Local Plan's which have relied on these sites in the past have failed as the sites have not come forward for development. As such there is not an over	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									reliance on these sites in the Draft Local Plan and for these reasons the town centre fringe regeneration area has not been included in the proposed allocations. This is not to say that the Council would not be supportive of this area coming forward for development or any other brownfield site providing it is a suitable location for housing development. The sites proposed in the local plan have been selected to minimise impacts on biodiversity. For more information on the assessment of the biodiversity of sites see the relevant site assessment in the Sustainability Appraisal. Where necessary, appropriate mitigation will be required. Prior to granting planning permission further assessment work would be required to establish the likely presence of protected species. The presence of protected species would require developers to obtain a licence before development could commence. Developers would also have to submit a Phase II Habitat Survey with any planning application for development. The Phase II Survey aims to establish the size of populations of the protected species, to maintain conservation status and ensure that no statutory offence is committed during site development. National policy also requires development to demonstrate net gains to biodiversity.	
Mrs Anne Bland				DBDLP553		Site 392 - Elm Tree Farm	Object	Objection raised on the grounds of loss of green space and unnecessary urban sprawl. Loss of green space for recreation and ecology in the Whinfield area is of concern.	Please see officer response paper for further detail on loss of green space, urban sprawl and detail on the wider Skerningham area. The sites proposed in the local plan have been selected to minimise impacts on biodiversity. For more information on the assessment of the biodiversity of sites see the relevant site assessment in the Sustainability Appraisal. Where necessary, appropriate mitigation will be required. Prior to granting planning permission further assessment work would be required to establish the likely presence of protected species. The presence of protected species would require developers to obtain a licence before development could commence.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									Developers would also have to submit a Phase II Habitat Survey with any planning application for development. The Phase II Survey aims to establish the size of populations of the protected species, to maintain conservation status and ensure that no statutory offence is committed during site development. National policy also requires development to demonstrate net gains to biodiversity. The Bellway application referred to has been formally submitted for consideration and will be determined on its merits.	
Mrs Anne Blood				DBDLP555		Site 392 - Elm Tree Farm	Object	Objection to loss of green Sparrow Hall Drive. Area is of visual amenity as well as offering local recreation space.	Loss of open space is considered as part of the site assessment process in the Sustainability Appraisal. Sites resulting in a loss are scored negatively however where opportunities for re-provision or mitigation exists this is also factored in. Elm Tree Farm forms part of the wider Skerningham Masterplan Area so opportunities exist for wider enhancements. See also Skerningham Officer Response Paper.	No change recommended
Mr Christopher Bell	Highways England			DBDLP910		Site 392 - Elm Tree Farm	Object	Site of possible concern to Highways England with potential impact on the A1(M) at Junction 59 and the A66.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Frances Nicholson	Bellway Homes Limited (Durham)			DBDLP1163		Site 392 - Elm Tree Farm	Support	Supported for the proposed allocation however request minor changes to the overall housing policy elsewhere in the representation (Comment DBDLP1172).	Support is noted for the promoted site and additional detailed consideration and assessment will take place throughout the planning process.	No change recommended
Gerald Lee	Heighington and Coniscliffe Councillor			DBDLP267		Site 11 - Cattle Mart	Neutral	Clarification as to if this is the existing or proposed Cattle Mart site.	Officers have already confirmed this is the existing Darlington Farmers Market located on Clifton Road.	No change recommended

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Mr Christopher Bell	Highways England			DBDLP913		Site 11 - Cattle Mart	Neutral	Site of no concern to Highways England.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher Bell	Highways England			DBDLP914		Site 51 - Mowden Hall	Neutral	Site of no concern to Highways England.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP1119		Site 51 - Mowden Hall	Object	Potential harm to Grade II listed Mowden Hall should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The site now has planning permission. Impacts on heritage assets will have been considered through the application process.	No changed recommended.
Mr Christopher Bell	Highways England			DBDLP915		Site 59 - Rear of Cockerton Club	Neutral	Site of no concern to Highways England.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP1133		Site 59 - Rear of Cockerton Club	Object	Potential harm to adjacent Grade II listed heritage assets and Cockerton Village Conservation Area should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The site now has planning permission. The impact on heritage assets will have been considered through the application process.	No change recommended.
Miss Madeleine Sutcliffe				DBDLP388		Site 228 - Northgate House, Town Centre	Neutral	Northgate House should be demolished and replaced, not converted.	There are limited planning powers to insist on demolition of buildings unless they are structurally unsound or form part of wider regeneration schemes. Conversions are often encouraged by national policy.	No change recommended
Mr	Highways England			DBDLP916		Site 228 - Northgate	Neutral	Site of no concern to Highways England.	The site has prior approval for conversion to residential use.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Christopher Bell						House, Town Centre				
Ms Emily Hrycan	Historic England			DBDLP1134		Site 228 - Northgate House, Town Centre	Object	Potential harm to Northgate and Town Centre Conservation Area's should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	Prior approval has been granted for the site for conversion to residential use.	No change recommended.
Mr Christopher Bell	Highways England			DBDLP917		Site 244 - Lingfield Point East	Object	Site of concern to Highways England owing to the proximity to the A66. Trip generation rates and the scale of impact requires further clarification.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher Bell	Highways England			DBDLP918		Site 318 - N. Allington Way	Object	Site of possible concern to Highways England with potential impact on the A66.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr Christopher Bell	Highways England			DBDLP919		Site 89 - Land West of Oak Tree, MSG	Object	Site of possible concern to Highways England with potential impact on the A66/A67.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP1136		Site 89 - Land West of Oak Tree, MSG	Object	Potential harm to Grade II listed Middleton Hall and S&DR HAZ should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The site now has planning permission. The impact on heritage assets will have been considered through the application process.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Mr Christopher Bell	Highways England			DBDLP920		Site 91 - Walworth Road, Heighington	Object	Site of possible concern to Highways England with potential impact on the A1(M) at Junctions 58 and 59.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP1138		Site 91 - Walworth Road, Heighington	Object	Potential harm to Heighington Conservation Area and it's various heritage assets should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The site now has planning permission. Heritage assets will have been considered through the application process	No change recommended.
Mr Christopher Bell	Highways England			DBDLP921		Site 95 - Beech Crescent East, Heighington	Neutral	Site of possible concern to Highways England with potential impact on the A1(M) at Junctions 58 and 59 and the A66 at Little Burdon.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Mr C Raistrick		Mr Joe Ridgeon		DBDLP1247		Site 95 - Beech Crescent East, Heighington	Object	Heighcroft House would be a preferable site to Beech Crescent east as it is considered to have less heritage impact.	Support is noted for the promoted site. Please see officer response to policy H 2 and promoted site (ref DBDLP1245)	No change recommended.
Miss Jennifer Earnshaw	Project Secretary Banks Property			DBDLP1407		Site 95 - Beech Crescent East, Heighington	Neutral	Increase the yield for site 95 from 20 to 30 to show a more appropriate level of density as suggested in the latest HELAA and to reflect the density of the adjacent development. Reference in statement from where vehicular access should be taken should be removed as detailed assessment needed.	It is considered that the yield for site 95 Beech Crescent East, Heighington is appropriate. The yield is lower than the standard density multiplier in the HELAA due to site constraints - site shape and location adjacent to the bypass. No evidence has been submitted to justify the higher yield other than referring to the adjacent site which has a different context. Reference has been made to a higher figure in the HELAA however this was a drafting error. It is not considered appropriate to estimate delivery starting on this site from 2020 as planning permission is still required. It is important to note that the site yields are indicative and will be finalised at the planning application stage. The housing trajectory does not place any	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
									phasing restrictions on the sites and they may come forward sooner than indicated. Vehicular access statement in point a) remains on basis of Highways advice	
Mr Christopher Bell	Highways England			DBDLP922		Site 99 - Maxgate Farm, MSG	Object	Site of possible concern to Highways England with potential impact on the A66/A67.	The Council will continue to liaise with Highways England on transport matters and in particular impact on the strategic highway network. Transport modelling work is ongoing to test highway mitigation schemes to ensure developments do not have an unacceptable impact on local and strategic highway network.	No change recommended
Nick McLellan	Story Homes			DBDLP1043		Site 99 - Maxgate Farm, MSG	Neutral	Propose to amend proposals for site to omit the school and continue to liaise with the council and other stakeholders.	Comments noted.	No change recommended.
Nick McLellan	Story Homes			DBDLP1046		Site 99 - Maxgate Farm, MSG	Support	Supported for the proposed allocation is reiterated.	Support is noted for the promoted site and additional detailed consideration and assessment will take place throughout the planning process.	No change recommended
Mr Christopher Bell	Highways England			DBDLP923		Site 146 - Land south of railway line, MSG	Object	Site of concern to Highways England with potential impact on the A66.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
Ms Emily Hrycan	Historic England			DBDLP1140		Site 146 - Land south of railway line, MSG	Object	Potential harm to Middleton One Row Conservation area and Grade II listed Middleton Hall should be given greater consideration to provide a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of sites for development and to ensure appropriate mitigation measures to minimise harm.	The site now has planning permission. Heritage assets will have been considered through the application process.	No change recommended.
Mrs				DBDLP312		Site 333 - East of Roundhill	Support	Support for provision of additional housing in Hurworth.	Support noted.	No change recommended

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / change recommended
Catherine Noble						Road, phase 2, Hurworth				
Mr Christopher Bell	Highways England			DBDLP925		Site 384 - Oak Tree, MSG	Neutral	Site of no concern to Highways England.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
Mr Christopher Bell	Highways England			DBDLP926		Site 386 - Land between Yarm Road and railway line, East, MSG	Neutral	Site of no concern to Highways England.	The site now has planning permission. Highways and traffic will have been considered through the application process.	No change recommended
MR MICHAEL GREEN				DBDLP457	APPENDIX C	DARLINGTON'S HERITAGE ASSETS	Support	Support for Appendix C noted. Detailed comment relating to the heritage, environmental and archaeological significance of, and community connection to, the Blackwell Grange East site (site ref 9). A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Object to the proposal to allocate Blackwell Grange East site (site ref 9) for residential development.	The council is aware of the heritage and environmental interests on the Blackwell Grange East site and this has informed (along with a arboricultural report and two statements of significance - one on the Listed Buildings and one for the Historic Park and Garden) the scale and location of development proposed on this site. Where necessary, the Council will undertake an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. This work will be undertaken prior to their inclusion in the Proposed Submission Local Plan. Once completed, appropriate mitigation measures identified will be included within the policy and/or supporting text.	Depending on the outcome of the Council's Heritage Impact Assessment, changes to the plan may be necessary prior to the publication of the Submission Draft Local Plan.

APPENDIX 5

Responses and Recommended Changes to Sustainability Appraisal

Comments can be viewed in full at **www.darlington-consult.objective.co.uk/portal**
Subject to member approval 'Officer Responses' will also be made available online.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Dr Ellen Bekker	Lead Adviser Natural England			DLPSA2		Sustainability Appraisal	Support	Natural England considers this report to provide a good framework to assess the impacts from the Local Plan. We note that measures for monitoring will be included with the final report. As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). We would like to raise awareness that any monitoring indicators should relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions (i.e. an indicator on the general condition of SSSIs would not be suitable). Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate. **Biodiversity:**	Support and comments noted. The suggested monitoring indicators will be considered during the preparation of the Proposed Submission Local Plan and accompanying updated Sustainability Appraisal.	No recommended changes.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. • Percentage of major developments generating overall biodiversity enhancement. • Hectares of biodiversity habitat delivered through strategic site allocation **Green infrastructure:** • Percentage of the city's population having access to a natural greenspace within 400 metres of their home. • Length of greenways constructed. • Hectares of accessible open space per 1000 population.		
Mr Fishdog Fisher				DLPSA1		Sustainability Appraisal	Object			
Mr Derek Dodwell	Darlington Association of Parish Councils			DLPSA31		Sustainability Appraisal	Neutral	"Sustainability" has become a watchword in planning terms since the NPPF. The Local Plan Sustainability Appraisal gives some indication of the depth and complexity of the process. The process is dependant in part in "weighing up" the pros and cons of a vast range of propositions, applied to policies across the whole spectrum of the Plan. Interestingly, it appears that no views or comments have been appended to the Sustainability Appraisal – probably because	Comments noted. The Draft Sustainability Appraisal, and before it the Sustainability Appraisal Framework, were both the subject of public consultation. In due course an updated Sustainability Appraisal will be the subject of public consultation alongside	No recommended changes.

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								of the detail and complexity of the Appraisal, and the fact that some knowledge is required to understand it. The importance of this process to decision-making in all planning matters lends weight to the suggestion made at the end of paragraph 2 above that there should be some form of community representation in its operation. The alternative is that public opinion will continue to be dependent on personal opinion – not necessarily well-informed – and prejudices.	the Proposed Submission Local Plan. This report of the consultation response on the Draft Sustainability Appraisal has informed the preparation of the updated Sustainability Appraisal.	
Ms Emily Hrycan	Historic England			DLPSA32		Sustainability Appraisal	Object	Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for. In view of our comments made on the local plan (see separate letter ref: PL00025675), which has suggested some changes to the Plan, we will not be providing detailed written comments on the sustainability appraisal. However, in commenting on the site allocations included within the Plan we have raised concerns about the content of the SA which does not provide an appropriate assessment of the sites to determine whether they can be allocated without harm to the historic environment.	Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. This work was undertaken prior to their inclusion in the Proposed Submission Local Plan. The SA assessment for sites has been updated in line with the outcome of the impact assessment.	The SA assessment for sites has been updated in line with the outcome of the impact assessment.

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								We would be happy to work with you to discuss the issues raised in our representation on the Plan in conjunction with the SA. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.		
Mrs/Dr Bryony Holroyd				DLPSA3	1.3	Paragraph	Support	I support this but believe it should go further - a true assessment of whether plans are sustainable (i.e. continuable indefinitely) requires the assessment of the carrying capacity of the Darlington area in terms of number of people and their resource requirements - water, fuel, fibres, food, building materials, greenhouse gas emissions etc. If we are already above that carrying capacity, this must detail how the town plans to contract and converge its resource use - both per person and in total - so that all global citizens can have a fair distribution of the world's resources. The Contraction and Convergence model by the Global Commons Institute, its evidence and principles are presented widely on the internet hence I don't think it's useful to provide any specific links. I cannot find evidence of such investigation into how many people can be safely supported in Darlington being completed, or the evidence being presented.	The Council's Sustainability Appraisal has been prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004 and EU Strategic Environmental Assessment (SEA) Directive, along with national policy and guidance. The assessment includes a baseline of available information on trends in a wide range of social, environmental and economic indicators for Darlington.	No recommended changes.
Mrs/Dr Bryony Holroyd				DLPSA4	2.3	Paragraph	Support	Again, this statement is good, but should go further - a measure of healthy activity for example time spent walking, cycling per day, and percentage using active travel to get to work, school, shops etc. should be included as a measure of whether the town is a Healthy New Town. This would help prioritise investment in active transport	The Sustainability Appraisal Baseline set out at Appendix B of the draft document contains a wide range of indicators of social, economic and environmental conditions in the Borough.	No change recommended.

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								measures within the town, where deprived areas are often so because residents cannot afford a car, do not feel safe cycling on the road conditions (often terrifying, both drivers driving unsafely and broken road surface) and the limited public transport means they cannot easily access employment and other opportunities, so would also help reduce deprivation and inequality as well as improve health.		
Mrs/Dr Bryony Holroyd				DLPSA5	2.4	Paragraph	Support	I would add that the town is also of sub-regional importance for educational opportunities, as many students travel great distances to attend the QE sixth form college, Darlington College, and the Teesside University campus here.	Agreed. A new paragraph has been added to this section of the Draft Sustainability Appraisal to reflect the comment.	The following text has been added after paragraph 2.4: 'Darlington is of sub-regional importance for higher education opportunities, with students travelling from across the sub-region to attend Queen Elizabeth sixth form college, Darlington College, and Teesside University's Darlington campus.'
Mrs/Dr Bryony Holroyd				DLPSA6	2.5	Paragraph	Object	I disagree with the aspect that the Local Development Plan "helps make sure that development and regeneration contributes as best it can to the prosperity, health and quality of life in the Borough, and achieves more sustainable development overall" - this is toned in a very qualified and rather	Noted. The bullet point has been reworded accordingly.	The fourth bullet point under paragraph 2.5 has been amended to read: 'ensures that development and regeneration

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								negative way and should be rephrased to for example, the LDP should "ensure that development and regeneration contributes best to the health and quality of life in the Borough and achieves sustainable development" - it should also recognise that on a limited-size planet, infinite growth is unsustainable, so a maximum sustainable size for the town should be recognised beyond which Darlington could not safely be maintained ad infinitum.		contributes towards the prosperity, health and quality of life of people in the Borough and achieves sustainable development'
Mrs/Dr Bryony Holroyd				DLPSA7	2.10	Paragraph	Support	As already mentioned, identifying environmental limits, and therefore the limits to growth as they apply to Darlington, need to be identified in terms of resource needs / use and as it relates to Contraction and Convergence is important to ensure that over-development does not take place, and more people brought into the area than can be safely provided for sustainably.	Comment noted.	No change recommended.
Mrs/Dr Bryony Holroyd				DLPSA13	5.2	Paragraph	Object	I support all other aspects of this statement, however this statement should be amended to state that "homes will be of a high design and construction standard". Darlington should be aiming high, using high-quality prefabricated highly insulated building materials with renewable energy heating and green roofs - not building bog-standard properties which will shortly have to be retrofitted to improve their insulation, add renewable energy and take out fossil fuel heating systems to reduce the residents' unnecessary energy costs.	Agreed. The paragraph will be amended to reflect this comment.	Amend paragraph 5.2 to read: 'that new buildings will be of a ~~good~~high quality design and construction standard;'
Mrs/Dr Bryony Holroyd				DLPSA19	7.1	Paragraph	Object	I strongly object to the 10,000 homes target: this is insufficiently evidenced and should be reviewed ASAP in light of updated information. In this austerity climate with Brexit about to hit our economy and all the	Please see officer response on housing requirement and standard method.	Please see officer response on housing requirement and standard method.

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								major department stores in the town closing, this really doesn't seem correct or realistic. If they do all come, they would have to go and work elsewhere, significantly contributing to pollution from the required transport. Speaking as someone trying to sell a home in Darlington which, whilst very nice, has been on the market for over a year now despite reducing the price, house prices are already dropping in the town, and the construction of excess new homes could have a devastating effect on existing residents, driving some into negative equity. Yes, house prices need to stabilise and come closer to the level affordable by those on the median wage here, but this should not be a sudden drop or it will cause stagnation, possible abandonment of some older less-desirable areas of the town, and a waste of resources building unnecessary homes with the associated loss of green space.		
Mrs/Dr Bryony Holroyd				DLPSA21	7.4	Paragraph	Object	It should be made clear to developers that brownfield sites need to be developed first, and only greenfield development permitted if that does not sufficiently meet housing need. Of course developers will prioritise greenfield sites which have no clean-up issues to deal with first (with their associated costs) or other constraints fitting between existing development, but planning policy should be developed on the basis of what is best for the town and its type of housing need, not what can be turned around most quickly and cheaply by the developers, so this section is pretty irrelevant. We need more smaller affordable units which town centre flats, townhouses and sheltered accommodation would provide.	In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal.	No change recommended.

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									Please see officer response on brownfield sites, urban sprawl and empty homes.	
Mrs/Dr Bryony Holroyd				DLPSA22	7.5	Paragraph	Object	No extension of the urban area should occur beyond the "outer ring road" of the town i.e. the A1, A66 and Salters Lane / Whinfield Road, as these form a natural boundary to urban sprawl. The A66 in particular will cease to serve its function as a bypass if developments are built off it near the football stadium or Morton Park. All must remain inside this natural limit, or be considered an extension to the nearest village beyond. I support infill development in appropriate locations within the existing town boundary, provided that sufficient green space is retained as part of the development and no community or nature sites are destroyed in the process e.g. Maidendale nature reserve.	The Draft Local Plan does not include any development allocations beyond the A1(M) to the west and the A66 to the south and east of Darlington. The Skerningham and Greater Faverdale Strategic Allocations to the north of the town have been selected following the consideration of a number of potential strategic growth areas as part of the Issues and Scoping consultation in 2016 and subsequently the Sustainability Appraisal process. The North/North East of Darlington is considered to be a suitable, sustainable and deliverable location for a significant extension of the town. Policy ENV 4 and ENV 7, along with national policy, provide protection to green spaces and designated nature conservation sites.	No change recommended.
Mrs/Dr Bryony Holroyd				DLPSA20	Figure 7.1	Issues and Scoping Paper, May 2016 - Potential Locations for Strategic Development	Object	Given I dispute the number of new homes required, I feel numbers could be met by constructing high density flats / maisonnettes / townhouses in car-free developments immediately around the town centre, converting abandoned and unused	Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on housing requirement and standard method, and on

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								nightclub and retail space to be suitable for small business units on the ground floor, small offices on the middle floor if required, and residential space on the upper floor(s) would go a long way to meeting the housing need for the town over many years to come, with the advantage of little or no new traffic issues generated due to the nature of the new homes, and a revitalised town centre from all the new people living in it - which may be more appealing to retain young people in the town. Any further necessary homes could be provided in small developments as needed in rural villages, redeveloping large old abandoned buildings and brownfield sites across the town etc., resulting in no need for expansion into greenbelt areas. These are by nature further distant from the town centre and employment opportunities so will be more car-dependent sites, significantly worsening traffic issues unless major new public transport and active transport infrastructure is also constructed. The focus of any development should be around train stations (with the aim of re-opening the airport station for full service for travellers and new residents in that area, and potentially creating a new train station on the Bishop Auckland line in the Burtree area to meet need there) and bus routes, and close to businesses with staff there having priority in purchasing the homes to reduce travel need. Development should not occur in the heritage countryside to the north of Darlington - with its renewable energy facility (wind turbines) and community woodland. This is already far distant from the town centre with a rural feel which	Please see officer response on the Skerningham Strategic Allocation.	brownfield sites, urban sprawl and empty homes. Please see officer response on the Skerningham Strategic Allocation.

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								would be destroyed, and the land is accessed by significant numbers of people to leisure, dog walking etc. A very small amount of development infilling between the railway line and A67 at Harrowgate Hill might be supported, but no more than that. That is also the gateway view to Darlington from the north on the train - it's currently very visually appealing, but that would be significantly changed by a large sprawling development of new homes.		
Mrs/Dr Bryony Holroyd				DLPSA23	Figure 7.3	HELAA Assessment 2017	Object	The key on this map does not show what the salmon pink colour means. I strongly disagree with the need for any development outside of the existing urban limits. Development should occur first close to the town centre to redevelop it, infill and redevelopment of brownfield sites elsewhere in the town, and only later small developments around the boundary of the town (but not beyond the A1, A66 and Salters Lane / Whinfield Road) if housing demand is still not met.	Figure 7.3 is taken from the HELAA 2017 and has not reproduced very well in this document, the salmon pink coloured sites are those that were considered not suitable for development by the HELAA. In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal.	No change recommended.
Mrs/Dr Bryony Holroyd				DLPSA8	Table 3.2	Relevant Plans, Policies and Programmes	Support	This list of commitments and plans is incomplete and requires an addition as Darlington has also signed up to meet the European Covenant of Mayors for Climate & Energy commitments - both more	Comment noted. This document will be added to Table 3.2 and the Review of Plans, Policies and Programmes at Appendix A.	Add the European Covenant of Mayors for Climate &

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								ambitious and broad-ranging than EU climate commitments: signatories commit to developing a Sustainable Energy (and Climate) Action Plan within two years. Signatory cities pledge to actively support the implementation of the EU 40% greenhouse gas-reduction target (in total carbon emissions for the area, not per capita) by 2030 and agree to adopt an integrated approach to climate change mitigation and adaptation and to ensure access to secure, sustainable and affordable energy for all. Darlington's action Plan includes an Overall CO_2 emission reduction target of 21% by 2030 - it should be highlighted that this commitment is in total not per capita, so massively growing the town by 20% will make this harder to meet.		Energy to Table 3.2 and the Review of Plans, Policies and Programmes at Appendix A.
Marion Williams	Environment Agency			DLPSA33	Table 3.2	Relevant Plans, Policies and Programmes	Neutral	Table 3.2 Relevant Plans Policies and Programmes should include: A Green Future: Our 25 Year Plan to Improve the Environment, DEFRA, 11 January 2018. This should be integrated into the plan as it describes the goals the government, and therefore LPAs, are looking to achieve. The River Basin Management Plan, Northumbria River Basin District (Environment Agency, 2009) has been superseded by the 2015 version. The information in Appendix A page 54 is likely to be out of date. The baseline used in Appendix B page 111 does contain a link to the 2015 plan and uses 2015 data as a baseline.	Comment acknowledged. These documents have been added and updated in Table 3.2 and Appendix A of the Sustainability Appraisal.	The information in Table 3.2 and Appendix A of the Sustainability Appraisal has been amended accordingly.
Mrs/Dr Bryony				DLPSA9	Table 3.3	Sustainability Issues and Problems	Support	I agree with all of the below except for, in the section on congestion and pollution "Identified need to tackle congestion and network capacity" - predict and provide is	The purpose of Table 3.3 is simply to highlight key sustainability issues and problems facing the Borough	No change recommended.

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Holroyd								proven not to work in this arena, building more roads encourages more private car travel, hence this aspect should be rephrased to emphasise "reducing the need for private car travel, and hence reducing resultant pollution, freeing up capacity for essential journeys". Ideally this should be done by reducing network capacity for private cars and increasing capacity for other more space and fuel-efficient transport methods such as walking, cycling and public transport. Also "To tackle climate continued effort is required to reduce CO2 emissions and increase the generation of renewable energy at a local level." is very vague - this should detail aspects such as improved insulation of the town's homes, reduced dependence on fossil fuels for heating (gas and oil in areas not served by mains gas) and for transport, developing local sustainable organic food sources, reducing meat and dairy consumption, and other sustainable consumption habits such as developing repair and re-use centres to reduce waste of resources going to landfill - it's not only about renewable energy, much as that also needs to be increased as well. I do particularly agree with the assessment of varied provision of open space which needs to be rectified. Particularly gaps are identified in play facilities for children in College ward as there are none - perhaps part of the Abbey school site could be opened up for use by the public outside of school hours - and general greenery and open leisure space in Bank Top and Northgate wards.	following the review of plans, policies and programmes and baseline data for the area. The policies contained within the emerging Local Plan provide the approach that the Council intends to take to tackle these issues and the wider objectives of the plan. A number of the comments made are reflected in the Sustainability Framework set out in Table 4.1, such as reducing the need for travel by private vehicle and encouraging the use of more sustainable forms of travel is an objective of the emerging Local Plan, reflected by Sustainability Appraisal Objective 7. It is against the sustainability appraisal objectives and decision making criteria of the Sustainability Framework that the strategy, policy and site options for the Local Plan have been assessed in the Sustainability Appraisal. The Council have reviewed the decision to move the library from its current location in Crown Street and decided not to relocate it at this point in time. .	

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								There is a significant risk to a heritage building in the plans to relocate Crown Street Library from the Library building. With a covenant on the building to prevent its use for anything else the council will not be able to sell it, meaning it will be boarded up until some arsonist is likely to burn it down. This is a very unpleasant thought and should not be allowed to happen - the best way of doing this is to retain it as a Library, and find other different and more appropriate services to fit into the spare space in the Dolphin Centre more likely to bring in the extra income that is needed.		
Marion Williams	Environment Agency			DLPSA34	Table 3.3	Sustainability Issues and Problems	Neutral	Climate Change & Energy Protecting and enhancing ecological networks and making space for changes to rivers: Suggested revised wording – 'Likewise, planning should allow space for natural changes to rivers caused by changing climatic conditions and their normal geomorphological processes.'	Agreed. The suggested change has been made to Table 3.3.	The final sentence of the summary under Climate Change and Energy - Protecting and enhancing ecological networks and making space for changes to rivers in Table 3.3. has been amended to read: 'Likewise, planning should allow space for natural changes to rivers caused by changing climatic conditions and their normal geomorphological processes.'

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Marion Williams	Environment Agency			DLPSA35	Table 3.3	Sustainability Issues and Problems	Neutral	We recommend the Council also considers reducing other air pollutants which have a harmful effect on human health and the environment, for example NOx and particulates from traffic, farming and some industrial processes.	Agreed. The suggested change has been made to Table 3.3.	The title of the first entry under Climate Change and Energy in Table 3.3 to: 'Reducing ~~carbon dioxide~~harmful emission outputs and increasing renewable energy generation.' and amend the accompanying summary text has been amended to read: 'To tackle climate continued effort is required to reduce ~~CO2~~carbon dioxide, nitrogen oxide and other harmful emissions and increase the generation of renewable energy at a local level.
Marion Williams	Environment Agency			DLPSA36	Table 3.3	Sustainability Issues and Problems	Neutral	Environmental Protection Some rivers of poor and bad ecological quality Suggested revised wording – 'A number of tributaries of the Tees and Skerne are not currently at good status under the WDF, in particular the Neasham Stell was classified as of bad ecological quality in 2015.'	Agree. The suggested change has been made to Table 3.3.	The summary under Environmental Protection - Some rivers of poor and bad ecological quality in Table 3.3. has been amended to

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										read: 'A number of tributaries of the Tees and Skerne are ~~of poor ecological quality~~ not currently classified as being of good ecological status under the Water Framework Directive, in particular the Neasham Stell was classified as of bad ecological quality in 2015.'
Marion Williams	Environment Agency			DLPSA37	Table 3.3	Sustainability Issues and Problems	Neutral	We recommend the Council aims to achieve a protected habitat net gain over the period of the Local Plan.	Agree. Table 3.3. has been amended to reflect the aim of achieving net gains for biodiversity in the NPPF	The following text has been added in Table 3.3 at the end of the summary under Biodiversity and Geodiversity - Protecting the best and most versatile agricultural land, priority habitats and species and expanding range where possible: Aim to achieve net gains for biodiversity in line with the NPPF.

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Mrs/Dr Bryony Holroyd				DLPSA10	Table 4.1	Sustainability Framework	Neutral	Some aspects in this table I disagree with, some need to go further: Point 3 in this list about active and healthy lifestyles fails to mention active travel, this is not a leisure activity but a key part of getting about for all routine journeys - a key point to measure should be the percentage of people travelling actively to work, to get to leisure pursuits, to the shops and for all other journeys. Healthy activity should be built in as an integral part of the daily routine, and not seen "only" as bolt-on "leisure activity". Payment of incentives by local employers should be encouraged for employees to walk or cycle to work (as it's shown they take fewer sick days), as well as salary sacrifice schemes to pay for annual public transport passes. in point 4, I would also urge that policies should also attempt to address the shortage of teachers, as many leave the profession completely, go part-time or teach supply-only due to poor work-life balance and stress. At a minimum, encourage teachers from other parts of the country to relocate to Darlington where their salary will go further. Point 5.c is particularly important in light of active transport - the town's highways are currently NOT safe for it, and no significant improvements in participation will be seen unless walking and cycling infrastructure protected from motorised vehicles is constructed across the borough, prioritised over those vehicles at junctions. It would be irresponsible to urge greater active transport in point 3 without providing necessary infrastructure to first ensure	The Sustainability Appraisal Objectives (SAO) set out in table 4.1 need to be read as a whole, SAO1 stipulates that new housing should be delivered in sustainable locations with access to a range of local services and facilities within easy walking and cycling distance with the intention of promoting these forms of transort both to reduce the use of private vehicles and improve the health of residents. Local planning policies contained in the Local Plan cannot require employers to offer incentives for employees to walk/cycle to work, address shortages of teachers or influence parking/highways enforcement. It is possible to sustain economic growth alongside population growth in order to maintain a stable and prosperous economy with a range of employment opportunities for residents. As mentioned, with new low carbon technologies and cleaner energy and travel options economic growth does not necessarily imply that there will be associated negative environmental effects.	No change recommended.

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								safety, otherwise take-up will be poor, road deaths will increase and no health or safety benefits will be seen. Bite the bullet and re-prioritise the road space away from cars which are a very inefficient use of space and a real danger for all others trying to get about. In the meantime, serious enforcement is required of pavement parking, close passing of cyclists, dangerous driving such as overtaking at junctions and on roundabouts, jumping red lights, stopping in cyclist advance stop lines and hatched junctions, speeding, and aggression towards other vulnerable road users - there is no penalty in this town for behaviour which risks the life of others. Point 6 should NOT be about economic growth - growth on a fixed-size planet with limited resources is not sustainable. It should be about having a stable economy, in neither growth or decline - prosperity without growth - with new low-carbon businesses developing to replace old high-carbon businesses as they go into managed decline, with retraining opportunities provided to employees as required. Phrase point 7 as "Provide development which maximises access to public transport and active travel modes, and minimises reliance on private vehicles." to make clear that new development should be specifically designed so that the former part of the sentence provides the majority of the residents' transport needs. Point 8 requires adding a section f: will it facilitate the use of low-carbon fuels / energy for home heating and lighting?	Sustainability Apppraisal Objective 8 includes a decision making criteria relating to the generation of renewable energy.	

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Marion Williams	Environment Agency			DLPSA38	Table 4.1	Sustainability Framework	Neutral	3 - This section could be strengthened by aiming to reduce the impact of short term peaks and long term effects of air pollution across the area, from traffic, farming and some industrial processes. One example could be preventing playgrounds being built next to busy roads and re-site existing play grounds in areas of high pollution, or making safe walkways to school, away from busy roads.	The purpose of Table 4.1 is to provide a framework against which policies and proposals in the Local Plan can be assessed. The framework contains a number of objectives that, either directly or indirectly, seek to reduce the impact of the Local Plan on air pollution.	No change recommended.
Marion Williams	Environment Agency			DLPSA39	Table 4.1	Sustainability Framework	Neutral	8 - The local plan only refers to reducing carbon dioxide but here the aim is to reduce all greenhouse gases, it needs to be consistent. We recommend targeting CO2, CO, NOx, SO2 and particulates, but targets must be evidence-based.	Comment noted. Sustainability Appraisal Objective 8 of Table 4.1 refers to the reduction of greenhouse gases, it does not single out carbon dioxide. Table 3.3 has been amended to include reference to other greenhouse gases. An updated Sustainability Appraisal report has been prepared to accompany the Proposed Submission Local Plan that includes proposed monitoring measures.	The first row under Climate Change and Energy in Table 3.3 has been amended to refer to all greenhouse gas emissions as opposed to just carbon dioxide.
Marion Williams	Environment Agency			DLPSA40	Table 4.1	Sustainability Framework	Neutral	10 - There are no references to minimising air pollution, dust, fumes, smoke, commercial waste.	Comment noted. Air pollution is dealt with under Sustainability Appraisal Objective 8. However, decision making criteria a. has been amended to include reference to other forms of air pollution including fumes and smoke. Decision making criteria d. of Sustainability Appraisal Objective 9 includes provision	The decision making criterion a. of Sustainability Appraisal Objective 8. Reduce greenhouse gas emissions and increase the borough's resilience to climate change (Table 4.1) has

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									for whether proposals will increase the prevention, re-use, recovery and recycling of waste. Sustainability Appraisal Objective 10 has been amended to include reference to dust.	been amended to read: 'a. Will it reduce emissions of greenhouse gases (and other sources of air pollution including fumes and smoke), including by encouraging energy efficiency?' Sustainability Appraisal Objective 10. Minimise levels of noise, vibration, odour and light pollution, and decision making criteria a. (Table 4.1) has been amended to read: '10. Minimise levels of noise, vibration, dust, odour and light pollution.' Decision making criteria a. of Sustainability Appraisal Objective 10. Minimise levels of noise, vibration, odour

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										and light pollution (Table 4.1) has been amended to read: 'Will is avoid unacceptable levels of noise, vibration, dust, o dour and light pollution?'
Marion Williams	Environment Agency			DLPSA41	Table 4.1	Sustainability Framework	Neutral	12 - We recommend the Council reviews the location of their air monitoring equipment across the Borough, to ensure representative results upon which to base their air quality improvements targets. It is possible that the locations of air monitoring stations have remained unchanged for many years yet the location of peak emissions have changed. We also recommend the decision making criteria is extended when considering air pollution, with the aim to reduce air pollution at all sources not just at the monitoring locations.	The purpose of Table 4.1 is to provide a framework against which policies and proposals in the Local Plan can be assessed. The framework contains a number of objectives that, either directly or indirectly, seek to reduce the impact of the Local Plan on air pollution. An updated Sustainability Appraisal report has been prepared to accompany the Proposed Submission Local Plan that includes proposed monitoring measures. Whilst the point about the location of air monitoring stations is acknowledged and will be considered further, any monitoring measure included within the Sustainability Appraisal and Local Plan need to be manageable, and therefore focusing on locations with air monitoring equipment is appropriate.	No recommended changes.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Marion Williams	Environment Agency			DLPSA42	Table 4.1	Sustainability Framework	Neutral	13 – We suggest a supplementary decision-making criteria: f) Will it protect or improve the geomorphological condition of a waterbody? We recommend the criteria seeks to contribute to a habitat net gain across the Borough. Revised wording b) Will it maximise the use of brownfield land and minimise the loss of greenfield and ecologically diverse and valuable land to development?	Comment noted. An additional decision making criteria has been added under Sustainability Appraisal Objective 13 as suggested. The wording of decision making criteria a under Sustainability Appraisal Objective 13 has been amended to include reference to making net gains in biodiversity. The site assessment rationale set out at Appendix F for this objective already includes a score that accounts for sites with the potential to deliver net gains in biodiversity so this change will not affect the results of the assessments already undertaken. The final suggested change to Sustainability Appraisal Objective 9 would duplicate the provisions of Sustainability Appraisal Objective 13 that seeks to protect and enhance biodiversity.	A new decision making criteria under Sustainability Appraisal Objective 13. Protect and enhance biodiversity and geodiversity(Table 4.1) has been added to read: 'f) Will it protect or improve the geomorphological condition of a waterbody?' Decision making criteria a. under Sustainability Appraisal Objective 13. Protect and enhance biodiversity and geodiversity (Table 4.1) has been amended to read: 'a. Will it protect and enhance ecological networks and locally designated nature conservation sites, resulting in net gains for biodiversity?'

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Mrs/Dr Bryony Holroyd				DLPSA11	Table 4.2	Balance between social, economic and environmental considerations	Object	Many aspects described below should have strong environmental aspects to their consideration - for example in point 1, well designed and located housing needs to be well insulated, have low carbon heating systems, renewable energy and SUDS built in, the location and design of the development should naturally prioritise active transport and be well served by public transport, or ideally part of mixed development so residents can work close by, all of which MUST be properly taken into account under the environmental theme. Similarly in point 3, health, wellbeing and lifestyles needs to promote access to green space, and wild space / countryside, also active and sustainable transport, encouraging more participation in organic allotment gardening and eating the resultant healthy low carbon food - all of which has important ecological and environmental aspects to it, maintaining green space and biodiversity, reducing carbon emissions from transport and the food supply, and reducing pesticide use and food waste. In point 6, there is no such thing as sustainable economic growth. The aim should be a stable economy with no growth or de-growth.	Comments noted. The scoring in table 4.2 under objectives 1 and 3 has been amended to reflect the fact that their achievement will require environmental considerations/improvements. Disagree with the final point. It is possible to sustain economic growth alongside population growth in order to maintain a stable and prosperous economy with a range of employment opportunities for residents.	Table 4.2 has been amended to show that Sustainable Objectives 1 and 3 will involve environmental considerations.
Mrs/Dr Bryony Holroyd				DLPSA12	Table 4.5	Compatabillity Testing of the Sustainability Objectives	Support	Overall support this assessment but object in terms of point 5 - where this overlaps with point 8 (climate change) and point 11 (flood risk) there will be a positive overlap since reducing impacts of climate change and extreme weather and floods will naturally help to reduce any impact on people's health and safety and that of their property (which	Agreed. The table has been amended to reflect this comment.	Table 4.5 has been amended to show a positive relationship between Sustainable Objective 5 and

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								could otherwise hypothetically burn in a wildfire or be washed away by floodwater).		objectives 8 and 11.
Chris McGough	Director McGough Planning Consultants Limited			DLPSA28	Table 8.1		Object	It is not possible to be certain if these assessments relate to just the vacant land to the north of Hansteen's site or the combined sites, as the red boundary of 22 suggests. The LPA granted planning permission in 2015 for an Asda super-store and PFS on this site after accepting that employment development was not financially viable - due to the cost of remediating contaminants from its former industrial use. In the committee report, Officers noted: "(we) do not dispute the evidence submitted and consider that the site, which has been vacant for nine years, is likely to remain vacant unless it is released for an alternative use". Paragraph 22 of the NPPF affirms that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The viability concerns affecting Hansteen's land have not changed in the three years since the Asda permission was approved. Employment development is still not viable. In addition, a planning application for another retail development involving Lidl, Home Bargains and a Starbucks drive-thru on half the site has recently been submitted. This proposal was the subject of a pre-application submission and in an email dated 18 October 2017, Officers summarised their position on the retail element of the proposal by stating, " I have checked with our Policy	Site 22 covers the Hansteen's site and the vacant land to the north. The assessment of potential development sites in the Sustainability Appraisal does not take into account the viability of development, only their relative social, economic and environmental sustainability. However, the assessment has been amended to better reflect the known contamination issues on this site.	The commentary under Sustainability Objective 9, and in the Overall Predicted Effect/Potential Mitigation sections of site assessment tables for Site 22: Land off Faverdale West (Tables 22H and 22E) has been amended to reflect the known contamination issues on this site and the requirement for remediation.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								Team, and they confirm that the principle of retail on this site is agreed..". None of this is reflected in the assessment. Without this, it is unsurprising the assessment concludes continued employment if fine; however, with this information, it would be unreasonable for the assessment to conclude as it does. The assessment should be updated to include the information on our client's land's planning history and viability concerns.		
Marion Williams	Environment Agency			DLPSA43		APPENDIX B: SUSTAINABILITY APPRAISAL BASELINE	Neutral	Climate & Energy – Renewable Energy – trends page 105 typo "The number of renewable electricity generating installations in Darlington increased by 72% between 2015 and 2015." Designated Sites – SSSI - This target is only until 2020 (as under Biodiversity 2020 target) this needs to be revised and looked at longer term to tie in with the timescale of this document. Priority Species –there only targets for three species, there should be a target set for each.	Comments noted. The Sustainability Appraisal Baseline has been updated as part of the Sustainability Appraisal submitted alongside the Proposed Submission Local Plan. These points have been addressed, where necessary, in the updated baseline.	Changes have been made to the Sustainability Appraisal Baseline (Appendix B), as necessary, to respond to the points raised in the comment.
Mrs/Dr Bryony Holroyd				DLPSA14		APPENDIX C: ASSESSMENT OF LOCAL PLAN OBJECTIVES	Neutral	The comment contains a number of suggested changes to the Local Plan Objectives. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal	The Local Plan Objectives are set out in the Draft Local Plan that was the subject of consultation at the same time as the Sustainability Appraisal. The purpose of Appendix C is to assess the compatibility of the emerging Local Plan Objectives against the Sustainability Appraisal Objectives.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Chris McGough	Director McGough Planning Consultants Limited			DLPSA29	Table E 1		Object	This site forms part of allocation 343 on the Faverdale Industrial Estate. Opting for option C would continue the allocation for B1, B2 and B8 employment use, which is not viable or sustainable in this case. The LPA granted planning permission in 2015 for an Asda super-store and PFS on this site after accepting that employment development was not financially viable - due to the cost of remediating contaminants from its former industrial use. In the committee report, Officers noted: "(we) do not dispute the evidence submitted and consider that the site, which has been vacant for nine years, is likely to remain vacant unless it is released for an alternative use". Paragraph 22 of the NPPF affirms that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The viability concerns affecting Hansteen's land have not changed in the three years since the Asda permission was approved. Employment development is still not viable. In addition, a planning application for another retail development involving Lidl, Home Bargains and a Starbucks drive-thru on half the site has recently been submitted. This proposal was the subject of a pre-application submission and in an email dated 18 October 2017, Officers summarised their position on the retail element of the proposal by stating, " I have checked with our Policy	Whether or not the site in question is designated as employment land in the Local Plan has no bearing on the Council's assessment of potential policy approaches in the Sustainability Appraisal. As stated, the site in question has extant permission for convenience retail uses, an employment generating use, that is unaffected by its designation under Policy E1. However, should this use of the site cease in the future an alternative class B1, B2 and/or B8 use would be considered appropriate given its location.	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								Team, and they confirm that the principle of retail on this site is agreed..". Given this context, the continued allocation of Hansteen's Faverdale land is at odds with the NPPF and would clearly fail the soundness test. Hansteen's land should be excluded for allocation 343 in policy E1. Clearly, this will require a changing the option for the SA from C.		
Mrs/Dr Bryony Holroyd				DLPSA17	Table ENV 1		Object	The comment contains a number of suggested changes to the assessment of environment policy options. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Table ENV 1, Historic environment: I disagree that Option B is the appropriate one, Option C should be followed - there are a quite limited number of historic sites in the Borough and it is worth protecting them. Table ENV4, Green infrastructure: Option C should be followed. Darlington has limited green infrastructure within the urban area that is irreplaceable, so should rightly be strongly protected. Around the outside of the urban area there are also key river and woodland / wildlife corridors essential for flood protection and also well-used public footpaths for healthy and active leisure pursuits. Table ENV7, Biodiversity and Geodiversity: it is right that development should be restricted in certain areas of key biodiversity or geological interest, so it must be ensured	Table ENV 1 - Option B still places a strong emphasis on the protection of the Borough's historic environment but would allow a degree of flexibility to enable the the potential harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposed development in decision making, in line with national policy. Table ENV 4 - Policy option B does place great importance on green infrastructure, providing for the protection for existing green infrastructure along with delivering new green infrastructure with new development. Table ENV 7 - Policy ENV 7 is not only concerned with designated heritage assets that are afforded strong protection through national policy and legislation. In line with	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								that SSSIs and other key biodiversity sites are never under consideration for development - option C is preferred. Table ENV 9, outdoor sports: please include cycle commuting in the "outdoor sports" strategy and related considerations.	national policy the priority will always be to avoid impacts on biodiversity, adequately mitigate, and only as a last resort be compensated for. Whilst it may take time to establish, given the right conditions new habitats, including woodlands, can be created alongside development. There are already a number of successful examples in the Borough, including the community woodlands. Table ENV 9 - comment noted. Policies ENV 4, IN 1 and other policies in the emerging plan seek to protect and enhance pedestrian and cycle routes across the borough for their health and environmental benefits.	
Mrs/Dr Bryony Holroyd				DLPSA15	Table H 1		Object	The comment contains a number of suggested changes to the assessment of housing policy options. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Table H1, Housing Requirements, it is unclear why the lower growth (or even reductions in jobs in the town) are perceived to have very negative effects. Table H3, tighter development limits would result in denser development within and immediately around the urban area and	Table H 1- As discussed in the summary for option D, planning for a lower housing target could potentially have negative effects associated with choosing this option as locally projected housing needs will be unmet and the Borough would effectively be planning for economic decline. The Local Plan is to be reviewed regularly, at least every 5 years, including an	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								villages, closer to public transport and more viable to access services on foot and by bicycle. Option C would therefore be more positive in terms of Objectives 7, 8, 13 and 14. Table H5, Affordable Housing, should provide a fixed affordable housing target for all developments in specific areas but with no exemptions, Option B but without option D. Table H8, Housing intensification - having experienced a relative in York suffering a complete change in character of their street due to conversion of a few of what were previously family homes to HMOs, resulting in 4 cars per property where previously only one or two were present, I would disagree with the removal of restriction on converting houses to HMOs without planning permission. Option A should be pursued.	update on housing requirements. Table H 3 - There would be little difference between the limits drawn under options B and C. Option B will however allow for some limited infilling and rounding off of settlements, particularly important to the development of smaller settlements over the plan period. Table H 5 - A policy combining both options B and D is considered to deliver a number of positives in terms of affordable housing delivery whilst at the same time being realistic about the viability of development in certain areas of the Borough and for certain types of development. Table H 8 - HMOs serve a purpose in the housing market providing a low cost and desirable housing option for some people. Therefore a criteria based policy with specific criteria to tackle some of the potential issues encountered with this type of housing is considered the most appropriate policy option.	
Mrs/Dr Bryony				DLPSA18	Table IN 1		Object	The comment contains a number of suggested changes to the assessment of transport and infrastructure policy options. A	Table IN 1 - New road connections around the western, northern and eastern	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Holroyd								full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Table IN1, sustainable transport network: I disagree that Option C should be part of considerations (Options A and B only are fine). Table IN2, accessibility: I agree! Particularly it should be ensured that all cycle routes and access points are accessible by disabled-adapted bicycles, cargo bikes and bikes fitted with tag-along trailers for children or goods. Table IN3, travel plans: I agree that local policy is best. Table IN4, parking provision: I disagree that Options A and B should be included. Option C only should be the preferred option. There are very large amounts of car parking for the town centre already and this needs to be reduced. Table IN9, renewables & energy efficiency: Does not go far enough. The Local Plan should lever in funding to improve energy efficiency and renewable energy in homes in other already existing parts of the town as part of new developments.	fringes of Darlington will deliver a number of benefits for residents and help to ease traffic in and around the town centre. This policy option does however need to balanced by other options to encourage the use of more sustainable forms of travel. Table IN 2 - Comments noted. Table IN 3 - Comment noted. The assessments under Appendix D of the Sustainability Appraisal only consider the broad Local Plan policy options and not the detailed policy criteria/approach. Table IN 4 - There is still strong demand for people to be able to park in and around the town centre. However, this policy option must be balanced by other options to encourage the use of more sustainable forms of travel. Table IN 9 - Planning obligations can only be sought where all of the following tests are met in relation to a new development proposal: necessary to make the development acceptable in planning terms; directly related to the development; and fairly	

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
									and reasonably related in scale and kind to the development. The Council would not therefore be able to use obligations to improve the energy efficiency of existing properties. In order to retrofit these technologies the permission of the landowner would also need to be secured.	
Mrs/Dr Bryony Holroyd				DLPSA24	Table SDO1.1		Object	Extensive comment on the assessment of Strategic Development Option 1. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal Some of the "Pros" in this table, particularly re. points 2 and 3 are worded very strangely and illogically, talking of "greater access to..." - this is for housing that does not yet exist. Currently it seems that many of the supposed "Pro's" are spurious and should therefore be revisited. As this site is on the urban boundary of Darlington it is far from the town centre and not well served by public transport, and is too far to walk into the town centre, though it may be cyclable. I would dispute the assessment that this site has "Greater potential for access by public transport, walking, cycling". Under point 14, I disagree that "Development on the edge of the settlement has potential to improve accessible green infrastructure to all residents."	The assessments in Appendix E consider how each potential strategic development location would be likely to affect the Sustainability Appraisal Objectives were they to experience development over the plan period. The assessments are written from this perspective. The scale of development possible in this location, combined with the existing local employment opportunities, access to existing facilities in the area and the potential to provide new facilities and supporting infrastructure mean that this location should be well served by the services and facilities needed to support new development locally, including new/extended public transport services. Development on the edge of settlements provides	The second to last bullet point in the 'Conclusions' section of Table SDO1.1 has been amended to read: 'Extension of public transport services, walking and cycling routes into site.' Make similar changes to bullet points in other strategic development option assessment tables as appropriate.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								Point 15, I would see the extension of the existing urban area as a Con, not a Pro, given this involves less efficient land use than infilling existing brownfield sites within the town. In the summary of what mitigation measures would be required, extension of public transport services into the site should be expanded to read "extension of public transport, walking and cycling routes into the site".	opportunities to enhance countryside access for existing and new residents through improvements to cycleways and footpaths and through the provision of new on-site green infrastructure. It is however recognised that, depending on the scale and location of development involved, the distance existing residents have to travel to reach open countryside may increase. Final point agreed.	
Mrs/Dr Bryony Holroyd				DLPSA25	Table SDO2.1		Object	Extensive comment on the assessment of Strategic Development Option 2. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal The same confusing language is used again of "greater access to....": for whom and in comparison to what? There are significant issues with this site: major impact on the transport network, potential worsening of flooding and surface water flooding, significant landscape and nature impacts on the Ketton countryside, the beautiful Skerne valley and the cherished Skerningham community woodland in this rural area - as such this site should not be recommended for development. It also purports to support the improvement of transport infrastructure - if that is a euphemism for helping to pay for a northern	The assessments in Appendix E consider how each potential strategic development location would be likely to affect the Sustainability Appraisal Objectives were they to experience development over the plan period. The assessments are written from this perspective. Please see officer response on the Skerningham Strategic Allocation. The lack of North bound slip roads at junction 57 of the A1(M) means it is not a viable option to stop HGV's from using the A1150, and until a new alternative is provided, the A1150 will continue to be the main route used for traffic	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								link road then I also oppose this as unnecessary. More effective would be to designate Salters Lane / Whinfield Road and North Road an HGV-free zone, with suitable enforcement.	moving between South Durham and Teesside.	
Chris McGough	Director McGough Planning Consultants Limited			DLPSA27	Table Site 22E		Object	It is not possible to be certain if these assessments relate to just the vacant land to the north of Hansteen's site or the combined sites, as the red boundary of 22 suggests. The LPA granted planning permission in 2015 for an Asda super-store and PFS on this site after accepting that employment development was not financially viable - due to the cost of remediating contaminants from its former industrial use. In the committee report, Officers noted: "(we) do not dispute the evidence submitted and consider that the site, which has been vacant for nine years, is likely to remain vacant unless it is released for an alternative use". Paragraph 22 of the NPPF affirms that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The viability concerns affecting Hansteen's land have not changed in the three years since the Asda permission was approved. Employment development is still not viable. In addition, a planning application for another retail development involving Lidl, Home Bargains and a Starbucks drive-thru on half the site has recently been submitted. This proposal was the subject of a pre-application submission and in an email dated	Site 22 covers the Hansteen's site and the vacant land to the north. The assessment of potential development sites in the Sustainability Appraisal does not take into account the viability of development, only their relative social, economic and environmental sustainability. However, the assessment has been amended to better reflect the known contamination issues on this site.	The commentary under Sustainability Objective 9, and in the Overall Predicted Effect/Potential Mitigation sections of site assessment tables for Site 22: Land off Faverdale West (Tables 22H and 22E) has been amended to reflect the known contamination issues on this site and the requirement for remediation.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								18 October 2017, Officers summarised their position on the retail element of the proposal by stating, " I have checked with our Policy Team, and they confirm that the principle of retail on this site is agreed..". None of this is reflected in the assessment. Without this, it is unsurprising the assessment concludes continued employment if fine; however, with this information, it would be unreasonable for the assessment to conclude as it does. The assessment should be updated to include the information on our client's land's planning history and viability concerns.		
S Jobe				DLPSA26		Middleton St George	Support	Extensive response concerning the suitability of Site 90: West of St Georges Gate, MSG for inclusion as an allocation in Local Plan. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal	Comments noted. A number of minor amendments have been made to the assessment for this site to reflect comments made, but these changes do not change the scoring or overall predicted effect of this site in the Sustainability Appraisal. All sites will be expected to take a sustainable approach to water management and use sustainable drainage systems (SUDs) where appropriate. The potential for a minimal increase in traffic through the centre of the village resulting from this site is picked up under Sustainability Objective 7.	The following changes to the assessment for Site 90: West of St Georges Gate, MSG have been made: • Add a reference under Sustainability Objectives 3 and 7 to the proximity of the site to National Cycle Network route 14 (make similar changes to

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
									The commentary under Sustainability Objective 15 recognises that whilst development of the site would extend the form of the village, the site is fairly self-contained.	the assessments for other sites along this route). • Amend the first bullet point under the 'Potential Mitigation' section of the table to read: 'Retain and enhance the area of woodland on the eastern side of the site adjacent to the beck.'
S Jobe				DLPSA30	Table Site 90		Neutral	Extensive response providing additional information regarding the viability and deliverability of Site 90: West of St Georges Gate, MSG. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal It is requested that the development limits of Middleton St George be amended to include Site 90 within the new Local Plan and the site is further considered for housing allocation.	Comment noted. The points made in the comment are picked up by the Council's assessment of the site in the Sustainability Appraisal and reflected in the scoring for the site. Sufficient land has been identified in Middleton St George to meet local housing needs that is considered to score equally or better than site 90 against the sustainability objectives and which would	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								This site was assessed and accepted as being suitable, available and achievable for 109 housing units over the next 6 to 10 years in the recent DBC HELAA process.	create more logical extensions to the villages built form, being closer to the village centre, and/or of sufficient size to provide a mix of uses including new community facilities to serve the village. The HELAA is a technical study that determines the suitability, availability and achieveability of potential development sites across the borough, it does not consider the relative sustainability of site options.	
Mrs/Dr Bryony Holroyd				DLPSA16	Table TC 1		Support	Support all aspects dealt with here	Support noted.	No change recommended.

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This document was classified as: OFFICIAL

APPENDIX 6

DARLINGTON BOROUGH COUNCIL

DARLINGTON LOCAL DEVELOPMENT SCHEME

2020-2023

Preparation Programme for the
Darlington Local Plan
and other
Local Development Documents

DRAFT

February 2020

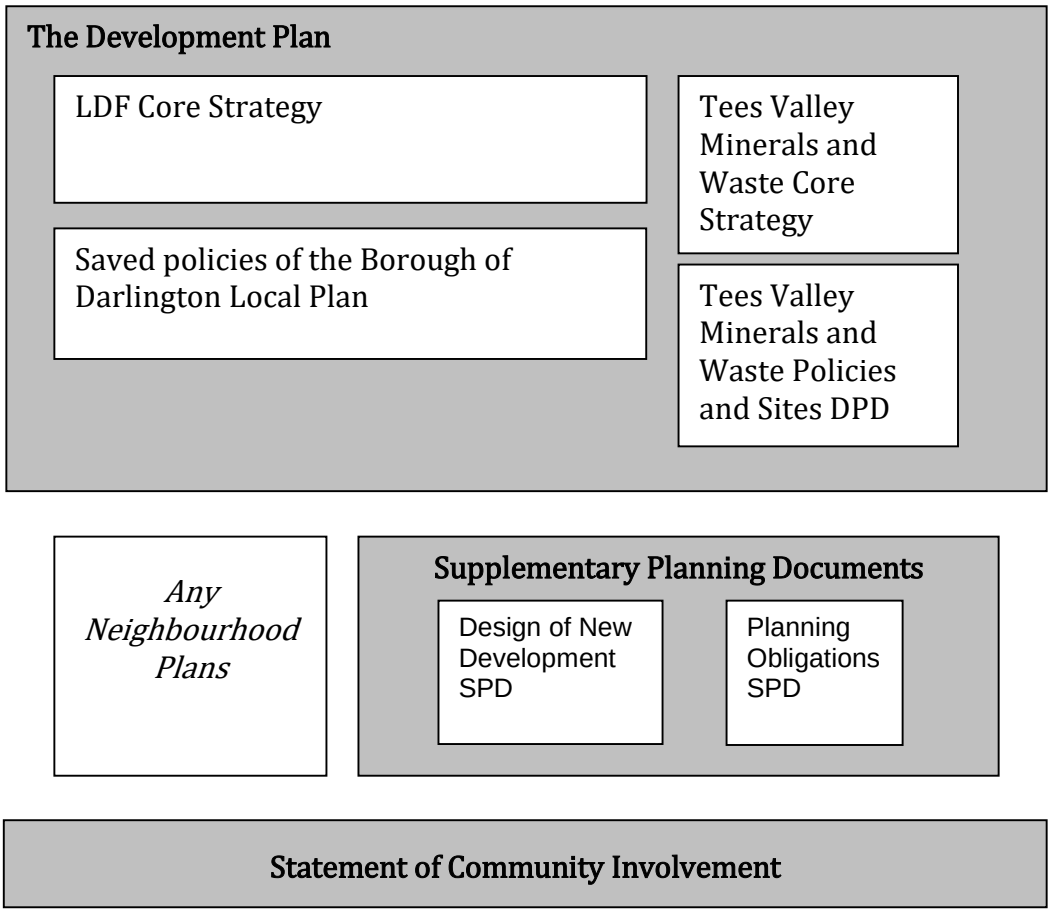
Planning Policy
Economic Initiatives Division

1. INTRODUCTION

1.1 A Local Development Scheme (LDS) is required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). The LDS sets out the timetable for the production of the Local Development Documents (LDDs) which make up the Council's Local Plan. The LDS must include certain types of LDDs, namely Development Plan Documents (DPDs) and a Statement of Community Involvement (SCI). The LDS must be made available publically and kept up-to-date. This LDS replaces the 2018 – 2021 LDS.

1.2 Figure 1.1 below shows the Council's current planning policy documents, which are part of, or support the Development Plan. It also shows the relationship of documents to one another. All statutory development plan documents and supplementary planning documents can be viewed on the Council's website, www.darlington.gov.uk/planningpolicy.

Figure 1.1: Planning Policy Documents for Darlington Borough



1.3 In November 2015 Darlington Borough Council decided to halt work on the emerging Making and Growing Places allocations document (an adopted Core Strategy was already in place) based mainly on concerns around the robustness of the housing supply and requirement figures. The decision was taken to produce a new comprehensive Local Plan. For the period before the new plan is adopted, an Interim Planning Position Statement has been produced to provide guidance to developers on the local interpretation of

National Planning Policy. A copy is available on the Council's website at www.darlington.gov.uk/planningpolicy

3. THE DARLINGTON LOCAL DEVELOPMENT SCHEME 2020-23

3.1 This Local Development Scheme (LDS) sets out the content, timing and resourcing of planning policy document preparation for the next three years, 2020-23. It plans for effective development plan coverage of the whole Borough, and is published to provide up to date information direct to the public about the Council's plan making activities. It will be updated as necessary to ensure it remains realistic and definitive.

The New Local Plan

3.2 On 15 November 2015 Cabinet agreed to proceed with a new Local Plan, to replace the existing Development Plan (the LDF Core Strategy (2011) and various saved Darlington Local Plan (2001) policies. The exception to this is the Tees Valley Minerals and Waste Core Strategy and Policies and Sites DPDs, to be reviewed at a later date. The Council aims to submit the Local Plan for inspection this year (with adoption likely to take another few months). The new Local Plan will cover the period between 2016 -2036.

3.3 A successful Local Plan will help create the conditions to deliver the following outcomes for Darlington:

- Well planned, high quality, sustainable places
- Inclusive and accessible places, to serve all needs and communities
- An attractive place to live, visit and invest
- Economic growth, new jobs and prosperity
- A vibrant town centre with strong retail, leisure and commercial sectors
- Celebrate and protect Darlington's heritage assets and key open spaces
- Integrated strategic social and physical infrastructure, phased to meet the needs of new development
- Increased resilience to climate change
- Greater certainty for residents, investors and stakeholders

3.4 **Table 1** sets out the timeline and key tasks for preparing the Local Plan. Progress will be monitored against it and revisions made if necessary.

Statement of Community Involvement (SCI)

3.5 The SCI sets out how people and organisations can get involved in shaping the Local Plan. Specifically it explains how and when the Council will engage with people and communities. Thus, throughout the preparation of the Local Plan the Council will consult with individuals, local communities, interest groups, businesses and statutory bodies. The responses to these consultations will be reviewed by the Council and considered in full, informing the Local Plan as necessary, before a final version is submitted to the Planning Inspectorate for independent examination.

3.6 A revised Statement of Community Involvement (Part 1) was adopted in July 2016 that covered the Local Plan process. No amendments are proposed to that at this time.

3.7 In addition to the overarching principles set out in the SCI, before all key stages of a Local Development Document, officers will produce an Engagement Plan, setting out details of when and how we will consult/ engage throughout the process. This will ensure consideration is given to the most effective way of communicating the particular issue, and that the methods engaged are proportionate.

3.8 The nature of Engagement Plans will be determined depending on the nature of the issues, and those likely to be affected. For example, they could be area based if the particular issue concerns a specific site, or they could target a particular sector. Consultations plans will ensure that consultations always meet statutory requirements.

Other Local Planning Documents

3.9 A Planning Obligations Supplementary Planning Document (SPD) was adopted by the Council in January 2013. It helps the Council to get contributions from developers towards affordable housing and the costs of mitigating the impact of new development on local infrastructure. The SPD includes a commitment to review the operation of the policies and, in light of the Council's experience using the SPD, changing market circumstances and development costs, and government guidance on the use of Section106 Agreements and the Community Infrastructure Levy, it is proposed that a revision of the SPD will be undertaken for any obligations not replaced in the local plan

3.10 The Design of New Development SPD sets out general and detailed design guidelines for new development to provide a framework to secure high quality, safe, distinctive, sustainable design in new developments. It needs to be revised to reflect changes to Building Regulations, Code for Sustainable Homes, and Development Management amenity issues. Further, there are matters that have arisen from the Healthy New Town Project that maybe usefully incorporated into this guidance. The Design SPD is very light on shop fronts and the Council have relied on a dated shopfront guide produced by Durham County Council. It is proposed therefore that we prepare a shopfront and security design guide.

3.11 **Table 1 (page 6)** gives an overview of the Local Development Scheme. More detail on the documents that will be prepared over the next three years is given in **Section 5** of this report.

Neighbourhood Planning

3.12 Introduced by the Localism Act 2011, the Council has a duty to support Parish Councils and neighbourhood forums that wish to prepare Neighbourhood Plans. When adopted Neighbourhood Plans form part of the statutory development plan alongside the Local Plan. The 5 areas, formally designated as Neighbourhood Plan Areas:

- Sadberge Parish Council, (decision subsequently taken not to proceed)
- Middleton St George/Low Dindsdale Parish Councils, and
- Blackwell Neighbourhood Forum.
- Low Conniscliffe Parish Council (Approved at referendum on 23 May 2019)
- Hurworth Parish Council

Other local communities may start work on Neighbourhood Plans during the Local Plan preparation period.

3.13 No contingency has been built into the Planning Policy team's work programme to respond to requests for advice and support on Neighbourhood Planning, and the situation will be continually monitored.

TABLE 1 – LOCAL DEVELOPMENT SCHEME 2019-2022

Document Title	Status	Role and Subject	Chain of Conformity	Commence	Draft Plan	Publication	Submission	Adoption
Darlington Local Plan	DPD	Sets out development policies for day to day use in considering a range of spatial development proposals, allocates sites for new development, and identifies areas of constraint. Covers the whole Borough.	National Planning Policy Framework	January 2016	June 2018	April 2020	August 2020	April 2021
Proposals Map and Insets	DPD	Illustrates on an Ordnance Survey map the policies and allocations of the Local Plan.	Consequential to the preparation of the Local Plan.	Updated as part of Local Plan				
Revised Planning Obligations	SPD	Detailed application of planning obligations	National guidance & Development Plan	Spring 2020		September 2020		April 2021
Revised Design of New Development	SPD	Design guidelines for new development	National guidance & Development Plan	Spring 2020		September 2020		April 2021
Joint Tees Valley Climate Change SPD	SPD	Guidance on energy efficiency standards and other climate change initiatives	National Guidance and Development Plan	Spring 2021		Autumn 2021		Spring 2022
Shopfront and Security Design SPD	SPD	Design guidance on shopfronts and security measures.	National Guidance and Development Plan	Spring 2021		Autumn 2021		Spring 2021

4. SUPPORTING STATEMENT

4.1 This statement explains the approach to preparing the Local Plan and how resources and risks will be managed.

Relationship with Local Strategies

4.2 'One Darlington Perfectly Placed', Darlington's Sustainable Community Strategy, sets out the community's shared vision and outcomes for the future of Darlington for the period 2008-2026. The Local Plan reflects spatially aspects of the strategy and ensures that the land use requirements arising from it are addressed.

4.3 Council, and other local strategies, with land use implications directly inform the preparation of DPDs and SPDs. These can all be found on the Council's website www.darlington.gov.uk/planningpolicy. Key examples include the Housing Strategy, the Economic Strategy, the Green Infrastructure Strategy, the Parking Strategy and the Sport and Physical Activities Strategy.

Joint Working

4.4 The benefits of joint working on issues with strategic cross boundary implications have been recognised for some time by the local authorities within the Tees Valley. The Localism Act 2011 introduced the 'Duty to Co-operate' placing this work on a statutory footing. A Tees Valley Development Plans Officers' Group meets on a regular basis, to share information and best practice, facilitate joint working and explore further opportunities. Membership of the group also includes representatives of Tees Valley Combined Authority (TVCA), and approximately every quarter meetings have been opened up to local authorities adjacent to the Tees Valley in County Durham and North Yorkshire. The council will prepare a statement of common ground with adjoining authorities in line with national policy requirements.

Evidence

4.5 The NPPF states that Local Plans should be based on an up to date and robust evidence base. A large amount of evidence gathered to inform the withdrawn Making and Growing Places DPD was used for the new Local Plan, although a significant amount of additional evidence has also been produced to reflect the extended Plan Period to 2036 as appropriate.

Sustainability Appraisal

4.6 Sustainability appraisal (SA) is carried out for all the development plan documents prepared (and SPDs where screening indicates it is necessary), and is an integral component of all stages of plan preparation. SA identifies the significant environmental, social and economic impacts of the policies and proposals and identifies if/how policies and proposals can be amended to achieve net gains across all three dimensions of sustainability. The process is undertaken to accord with the Strategic Environmental Assessment Directive (European Directive 2001/42/EC). Cabinet have already agreed

the Sustainability Appraisal Framework being used to test the Local Plan options against and an SA produced and consulted upon in Summer 2018 alongside the Draft Plan and will be updated in line with the changes made in the Proposed Submission Draft Plan.

4.7 The Sustainability Assessment is being assessed using internal resources.

Equalities Impact Assessment

4.8 Equalities Impact Assessment and Disability Equalities Impact Assessment is undertaken and its findings will be published alongside the Proposed Submission Draft Local Plan.. It is undertaken in-house within the team, with the views of protected characteristics groups being sought at key stages.

Staff Resources

4.9 The Planning Policy team is within the Economic Growth Directorate. It leads the preparation of the Local Plan and other planning policy documents. The team currently includes a Head of Planning Policy, Economic Strategy & Environment, one Principal Planning Officer, three full-time Planning Officers, (one currently on maternity leave) 1.5 Technical Officers and a Graduate Planner (Fixed Ferm for 2yrs). The Assistant Director (Economic Growth) also assists with various aspects of preparation including providing the strategic steer, the Member interface and public consultation.

4.10 Success in achieving the milestones set out in this LDS will depend on the amount of non plan preparation work the team does, on the amount and timeliness of help from colleagues across the Council in specific policy areas, such as transport and housing, and on there being no further cuts to the staffing resources available for planning policy work.

4.11 A Local Plan Members Reference Group (all party) and a Local Plan Steering Group (LPSG) (including non-Council stakeholders) is also in place to ensure input into planning policy document preparation from across the Council. These groups inform the recommendations that are placed before the Joint Management Team (JMT) or Chief Officers Board (COB), and/or Members.

4.12. Consultants are also used on specific pieces of work, particularly work carried out jointly by the Tees Valley authorities, and specialist technical studies and work. Officers from Tees Valley Combined Authority provide some statistical information and manage specific joint commissions of the Tees Valley authorities, such as for the economy and infrastructure.

Financial Resources

4.13 A consolidated budget has been established across the Economic Initiatives Division which covers the costs associated with Local Plan preparation (consultant's fees for evidence gathering, consultations and printing).

4.14 It is not anticipated there will need to be any significant further evidence gathering or consultation work during the remaining stages of plan preparation. There will be a need to carry out a Public Examination into the Local Plan in 2020, and an appropriate budget has been reserved for that.

4.15 The programme proposed in the LDS assumes that the budgetary resources that have been allocated to Planning Policy work in the Council's Medium Term Financial Plan are available in their entirety.

Monitoring

4.16 Up to date information about the Council's progress in plan preparation will be included in the Local Plan Authorities Monitoring Report (AMR), together with any reasons why plan making targets have not been met, and reporting on the effectiveness of and delivery against saved Local Plan and Core Strategy policies. It is published as soon as is convenient after the end of the reporting year (31st March). It includes the following information:

- Progress in preparing the Darlington Local Plan, compared with the milestones set out in the latest LDS, reasons for and proposed actions to address any slippage
- Any factors affecting the current year's LDS milestones and planned action.
- The need for new evidence or research.
- A review of policy effectiveness.
- Information showing future housing provision against housing requirements.

Risk Assessment

4.17 A risk assessment has been carried out for the LDS. The key areas of risk have been identified below as well as the actions that will be put in place to mitigate the risks:

Risk Identified	Mitigating Actions
Implications of changes to the national planning system and policy framework.	• Keep up to date with best practice, Inspectors and Court decisions relating to plan preparation. • Keep up to date with changes to national policy and implications for the Local Plan process • Maintain up-to-date local evidence base.
Change of political priorities.	• Controlling party has changed during plan preparation causing additional work and delay in communicating work and decisions made thus far. • Member involvement throughout the plan preparation process.
Not meeting 2017 government deadline for Local Plan adoption, leading to possible intervention by SoS (NB – Darlington has not yet been identified as a Planning Authority requiring intervention measures)	• Keep up to date with Government criteria for intervention and consider likelihood of intervention. • Maintain up-to-date LDS showing key milestones towards adoption. • Maintain progress against milestones. • Planning inspectorate have not indicated concern with progress thus far and were invited by the council to undertake and Advisory Visit in #### 2019.
Ability to maintain staffing levels.	• Regularly review the plan preparation programme through this LDS and its updates to match any changes in staff resources, changes of planning policy workstreams and other policy workstreams that staff are required to contribute to. • Recruit extra (temporary) staff, where necessary, to meet peaks in workload around key stages of plan development
Staff turnover, maternity leave or long term illness within core team.	• Continues to be a challenge. • Prioritise recruitment activity as soon as notice given. • Manage workloads to reduce stress. • Spread knowledge within core team to ensure a back-up if specialist absent. • Use short and medium term work experience placements for mutual benefit.
Completion of evidence base takes longer than expected.	• Clear specification in consultancy briefs, and tighter project management of consultancy commissions.

Risk Identified	Mitigating Actions
	• Ensure core team is kept abreast of latest good practice cited on discussion fora and other sources. • Ensure team carries out appropriate CPD to keep up to date with best practice. • Allow contingency in LDS for project overrun.
Increased volume, complexity or scope of non Local Plan work	• Regular review of extent of non Local Plan work handled by core team. • Assess options for further redeployment from within or outside of the Council.
Key stakeholders/ partners, such as infrastructure providers, unable to provide information or other input at key stages in the process.	• Secure commitment to contributing to Local Plan at the highest level in partners organisations, highlighting role of Local Plan in delivering the sustainable community strategy. • Provide stakeholders/partners with good notice of what will be required of them, and when. • Investigate ways of pooling resources to achieve desired outcomes.
Volume and complexity of representations and comment exceeds expectations.	• Engage with key stakeholders, developers, landowners and other local interests throughout the policy development • Build capacity outside of team to deal with processing representations received, e.g. colleagues within section and wider Division • Clarify through SCI how representations will be handled and do not respond on an individual basis. • Depends on number of comments at draft stage and how many we are able to negotiate to withdraw to save Examination time.
DPDs prepared are not found sound, have to be withdrawn, or are subject to legal challenge.	• Checking against the tests of soundness at each key stage of the plan preparation process, making use of the PAS self assessment toolkit. • Carry out community engagement in accordance with the Council's adopted Statement of Community Involvement. • Be diligent in undertaking and recording actions against new 'duty to co-operate'.
	•

5. LOCAL DEVELOPMENT DOCUMENT (LDD) PROFILES

5.1 This section provides a standard profile for each of the LDD's we intend to prepare, as identified in **Table 1**.

Local Plan	
DOCUMENT DETAILS:	
Role & Content:	Borough-wide detailed generic development policies, policies related to specific designations and environmental safeguarding areas and land allocations for different types of new development, cross referenced to a Policies Map.
Geographical Coverage:	Borough of Darlington
Status:	Development Plan Document
Review	Considered through the Local Plan Authority Monitoring Report.
TIMETABLE:	
Commencement of process	January 2016
Consultation on Strategic Issues and Options (Reg 18)	April 2016 to September 2016
Draft Local Plan (Reg 18)	June 2018 to August 2018
Pre-submission publication (Reg 19)	April 2020

Submission to Secretary of State (Reg. 22)	August 2020
Pre–hearing meeting	December 2020
Hearing Sessions Commence	January 2021
Estimated Date Adoption	April 2021

PRODUCTION:	
Organisational Lead:	Director of Economic Growth
Lead Section	Planning Policy Team
Management Arrangements	Cabinet Economy and Resources Scrutiny Committee and Members Panel Joint Management Team & Chief Officers Board Economic Growth Senior Leadership Team Local Plan Members Reference Group Local Plan Steering Group
Internal Resources:	Economic Growth Division, Communications Unit, Xentrall Design and Print Unit, Development Management. Input from other divisions of the Council as required.
External Resources:	Consultancy and development industry support for specific aspects of preparing and updating the evidence base, such as master planning and the Housing and Employment Land Availability Assessment.
Evidence Base	The Sustainable Community Strategy for Darlington, a range of technical studies (available on the Council's website) and previous consultation responses, sustainability appraisal and other assessment work carried out by the Council.
Community & Stakeholder Involvement	Consult Council Members. Consult local people, including Darlington Partnership, Parish Councils, development industry representatives, business groups, business operators and government agencies, in accordance with the Council's adopted SCI.

Revised Planning Obligations SPD	
DOCUMENT DETAILS:	
Role & Content:	Borough wide detailed technical guidance relating to the provision of planning obligations for a range of physical, social and green infrastructure from new development. It includes standard charges and formulae. The SPD develops and reflects the requirements of the National Planning Policy Framework and the emerging local plan.
Geographical Coverage:	Borough of Darlington
Status:	Supplementary Planning Document – adopted January 2013
Conformity	National Planning Policy Framework and Emerging Local Plan
Review	The current SPD includes a commitment to review the operation of the policies and, in light of the Council's experience using the SPD, changing market circumstances and development costs, and government guidance on the use of Section106 Agreements and the Community Infrastructure Levy, it is proposed that a revision of the SPD will be undertaken.

TIMETABLE:	
Commence preparation of Draft Revised SPD	Spring 2020
Consultation on Draft Revised SPD	September 2020
Estimated Date Adoption	April 2021
PRODUCTION:	
Organisational Lead:	Director of Economic Growth
Lead Section	Planning Policy Team
Management Arrangements	Cabinet Economy and Resources Scrutiny Committee Joint Management Team / Chief Officers Board Economic Growth Senior Leadership Team Local Plan Members Reference Group Local Plan Steering Group
Internal Resources:	Asset Management Working Group Input from other divisions of the Council as required Communications Unit Xentrall Design and Print Xentrall Web Team
External Resources:	Viability information provided by the District Valuer.
Evidence Base	Economic Viability of Housing Land and Non Housing land studies and addendum, various needs analyses; national guidelines; Sustainable Community Strategy, Infrastructure Delivery Plan
Community & Stakeholder Involvement	Council Members, local people, Darlington Partnership, Parish Councils, development industry representatives, government agencies, in accordance with the Council's adopted SCI.

	Revised Design of New Development SPD
DOCUMENT DETAILS:	
Role & Content:	Sets out general and detailed design guidelines for new development to provide a framework to secure high quality, safe, distinctive, sustainable design in new developments.
Geographical Coverage:	Borough of Darlington
Status:	Supplementary Planning Document – adopted July 2009
Conformity	National Planning Policy Framework and elements of Policy CS4 of the Core Strategy (to be replaced by Policy DC 1in the new Local Plan).
Review	It needs to be revised to reflect changes to Building Regulations, Code for Sustainable Homes, and Development Management amenity issues. Review will be dependent on whether Local Plan Policy covers issues

TIMETABLE:	
Commence preparation of Draft Revised SPD	Spring 2020
Consultation on Draft Revised SPD	September 2020
Estimated Date Adoption	April 2021
PRODUCTION:	
Organisational Lead:	Director of Economic Growth
Lead Section	Planning Policy Team
Management Arrangements	Cabinet Economy and Resources Scrutiny Committee Joint Management Team / Chief Officers Board Economic Growth Senior Leadership Team Local Plan Members Reference Group Local Plan Steering Group
Internal Resources:	Development Management Communications Unit Xentrall Design and Print Unit.
External Resources:	None
Evidence Base	
Community & Stakeholder Involvement	Council Members, local people, Darlington Partnership, Parish Councils, development industry representatives, government agencies, in accordance with the Council's adopted SCI.

Joint Tees Valley Climate Change SPD	
DOCUMENT DETAILS:	
Role & Content:	Sets out expectations on energy efficiency standards for new development.
Geographical Coverage:	Tees Valley Wide
Status:	New Supplementary Planning Document
Conformity	National Planning Policy Framework and elements of Policy CS4 of the Core Strategy (To be replaced by DC 1 in the new Local Plan)
Review	N/A
Timetable:	
Commence preparation of Draft Revised SPD	Spring 2021
Consultation on Draft Revised SPD	Autumn 2021
Estimated Date Adoption	Spring 2022
Production:	
Organisational Lead:	Director of Economic Growth
Lead Section	Tees Valley Development Plans Officers Group
Management Arrangements	Cabinet Economy and Resources Scrutiny Committee Joint Management Team / Chief Officers Board Economic Growth Senior Leadership Team Climate Change Group

Internal Resources:	Development Management Building Control Communications Unit Xentrall Design and Print Unit.
External Resources:	None
Evidence Base	
Community & Stakeholder Involvement	Other Tees Valley Authorities, Council Members, local people, Darlington Partnership, Parish Councils, development industry representatives, government agencies, in accordance with the Council's adopted SCI.

Shop Front and Security SPD	
DOCUMENT DETAILS:	
Role & Content:	Sets out expectations on shop front design and shop fron security
Geographical Coverage:	Darlington Town centre
Status:	New Supplementary Planning Document
Conformity	National Planning Policy Framework and elements
Review	N/A
Timetable:	
Commence preparation of Draft Revised SPD	Spring 2021
Consultation on Draft Revised SPD	Autumn 2021
Estimated Date Adoption	Spring 2022
Production:	
Organisational Lead:	Director of Economic Growth
Lead Section	Planning Policy and Conservation Officer
Management Arrangements	Cabinet Economy and Resources Scrutiny Committee Joint Management Team / Chief Officers Board Economic Growth Senior Leadership Team
Internal Resources:	Development Management Building Control Communications Unit Xentrall Design and Print Unit.
External Resources:	None
Evidence Base	
Community & Stakeholder Involvement	Council Members, local people, Darlington Partnership, Parish Councils, development industry representatives, government agencies, in accordance with the Council's adopted SCI.

DARLINGTON BOROUGH COUNCIL

DISPENSATION – SECTION 33 OF THE LOCALISM ACT, 2011

On 11th February 2020, the Managing Director and the Monitoring Officer, considering the number of Councillors who have interests in particular aspects of the local plan, that potentially could have consequential implications for themselves, their work places, or spouses, partners or civil partners or family members, agreed to grant a general dispensation, in respect of any disclosable pecuniary interests occasioned thereby, to allow full participation in regard to consideration and decision making about the Local Plan, at the Cabinet meeting on 11th February 2020, the Council meeting on 20th February 2020, and subsequent meetings.

Having regard to all relevant circumstances the dispensation was granted under grounds (a), (b), (c), and (e) of Section 33(2) of the Localism Act, 2011;

(a) that without the dispensation the number of persons prohibited by Section 31(4) from participating in any particular business would be so great a proportion of the body transacting the business as to impede transaction of the business;
(b) that without the dispensation, the representation of different political group on the body transacting the business would be so upset as to alter the likely outcome of any vote relating to the business;
(c) that granting the dispensation is in the interests of persons living in the Authority's area;
(d) (in the case of an authority operating executive arrangements) that it is considered that without the dispensation each member of the authority's executive would be prohibited by section 31(4) from participating in any particular business to be transacted by the authority's executive; or
(e) that it is otherwise appropriate to grant a dispensation.

All members will be impacted to a greater or lesser extent by the draft local plan, and their participation in decision making will be important.

The Local Plan a matter of public interest, and something about which all members need to express a view and make decisions.

Allowing members to participate, in these circumstances, is not likely to damage public confidence in the conduct of the Councils business.

In all these circumstances, the Managing Director and the Monitoring Officer agree that the grant of a dispensation in the terms set out above to members is appropriate.

Date: 12th February 2020

Signed:

Paul Wildsmith
Managing Director

Luke Swinhoe
Monitoring Officer