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DARLINGTON
Borough Council

Cabinet Agenda

5.00 pm, Tuesday, 15 September 2026
Council Chamber, Town Hall, Darlington, DL1 5QT

Members and Members of the Public are welcome to attend this Meeting.

1. Introductions/Attendance at Meeting.

2. Declarations of Interest.

3. To hear relevant representation (from Members and the General Public) on items on this Cabinet agenda.

4. Key Decisions:-

   (a) Darlington Borough Local Plan Review - Consultation on Draft Local Plan 2025-2042 and Submission to Secretary of State – Report of the Executive Director of Economy and Public Protection. (Pages 3 - 360)

A. C. Wennington

Amy Wennington
Assistant Director Law and Governance

Monday, 7 September 2026

Town Hall
Darlington.

Membership
Councillors Garner, Harker, McCollom, McEwan, Porter, Curry, Roche and Wallis

If you need this information in a different language or format or you have any other queries on this agenda please contact Olivia Hugill, Democratic Officer, Resources and Governance, 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 (e-mail olivia.hugill@darlington.gov.uk or telephone 01325 405363).

SPECIAL CABINET
15 SEPTEMBER 2026

DARLINGTON BOROUGH LOCAL PLAN REVIEW
CONSULTATION ON DRAFT LOCAL PLAN 2025 – 2042
AND SUBMISSION TO SECRETARY OF STATE

Responsible Cabinet Member -
Councillor Chris McEwan, Economy Portfolio

Responsible Director -
Trevor Watson, Executive Director Economy and Public Protection

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SUMMARY REPORT

Purpose of the Report

1. This report presents the responses and recommended amendments to the Draft Local Plan 2025 – 2042, as a result of public consultation held between 6th March 2026 and 28th April 2026. These amendments will be included within the Pre-Submission Version of the Local Plan (Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012) that will, subject to Council approval be published for a further consultation in September/October 2026 prior to submission to the Planning Inspectorate for examination in public by the government deadline of 31 December 2026.

2. It further seeks delegated authority for the Executive Director of Economy and Public Protection, in consultation with the Economy Portfolio Holder, to allow minor editorial amendments to the Draft Plan prior to consultation. Any comments received during this time, will be considered prior to the submission to the Secretary of State and further necessary changes agreed under delegated authority for the Executive Director of Economy and Public Protection in consultation with the Economy Portfolio Holder.

Summary

3. The Darlington Local Plan was adopted in February 2022 covering the period 2016 to 2036. The Local Plan is up to date and not due for review until it is five years old (before February 2027). Whilst the plan remains up to date, there are benefits to reviewing the plan early. It is worth noting that this review would only commence a year earlier than it would need to anyway to meet the five-year review requirement set by Government.

4. In March 2026, Cabinet agreed a draft of the Reviewed Local Plan for consultation. This consultation was undertaken between 6th March 2026 and 28th April 2026. All parties on the Local Plan consultation database, Parish Councils and Statutory Consultees were

notified. During this time, we received 100 responses which resulted in more than 650 comments to consider from individuals and organisations. A summary of the comments received, and the suggested amendments is included in **Appendix 3**.

5. The Local Plan provides a vision and a guide for the delivery of sustainable development over the next 15 years. It is about planning for our residents' future needs in terms of housing, and about how we protect and nurture our local environment whilst we provide these homes, the workplaces of the future, and our leisure.

6. The Executive Director of Economy and Public Protection will make arrangements for consultations on the updated plan, in line with the Council's Statement of Community Involvement. This will commence as soon as possible after Council resolution owing to the tight timescales being set by Government for submissions of Local Plans in the current system for Examination prior to 31 December 2026.

7. The plan review is being undertake under transitional arrangements put in place by the government for plans already in development. We will therefore avoid needing to produce a 'new style' local plan and any forthcoming national policy changes until our next plan review. Timescales for submission in this transitional arrangement are therefore tight and inflexible.

Recommendations

8. It is recommended that Cabinet note the content of this report and recommend to Full Council that :-

   (a) The suggested amends to the local plan are applied

   (b) Note the comments received during the first consultation;

   (c) Council agree a further minimum six-week period of consultation in line with the requirements of Regulation 19.

   (d) Authority is delegated to the Executive Director of Economy and Public Protection, in consultation with the Economy Portfolio Holder, to make any necessary changes to the documents referred to above before they are submitted to the Secretary of State for examination.

Reasons

9. 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).

Trevor Watson
Executive Director Economy and Public Protection

Background Papers

(i) National Planning Policy Framework, DCLG December 2024
(ii) Planning and Compulsory Purchase Act 2004
(iii) Localism Act 2011

David Nelson : Extension 6291

Council Plan	The Local Plan and supporting documents are integral to the delivery of the Council Plan and its priorities (adopted by Council in July 2024). The priorities are: ECONOMY - building a strong sustainable economy and highly skilled workforce with opportunities for all. The Local Plan allocates land for employment sufficient to meet the future needs of the Borough. HOMES – affordable and secure homes that meet the current and future needs of residents. The Local Plan allocates sufficient land to meet the boroughs needs, sets affordable housing requirements and ensures new developments are well planned, safe and attractive. LIVING WELL – a healthier and better quality of life for longer, supporting those who need it most. The existing Local Plan encourages development to consider health and wellbeing with a requirement for larger developments to undertake a Health Impact Assessment (HIA). Allowance is also made for older people's accommodation and sets a requirement for adaptable homes. The proposed updated plan goes a step further and includes a new mechanism to secure developer contributions towards health facilities and place greater restrictions on locations for hot food takeaways and gambling premises. CHILDREN AND YOUNG PEOPLE – supporting the best start in life, realising potential and raising aspirations. The Local Plan contains a mechanism to secure contributions to education provision and secure sites for new provision in key locations.

	COMMUNITIES – working together for safer, healthier and more engaged communities. The Local Plan throughout has a focus on delivering cohesive communities rather than individual developments. LOCAL ENVIRONMENT – a well-connected, clean and sustainable borough. The Local Plan contains numerous policies to protect both the natural and built environment.
Addressing inequalities	An Equalities Impact Assessment will be part of the plan when submitted for examination.
Tackling Climate Change	Achieving sustainable development is a fundamental objective of the Local Plan. The early review of the existing Local Plan will enable the council to develop additional policy to tackle climate change matters, reflect updated national policy and improve existing policies where necessary. The reviewed plan will be supported by an updated Sustainability Appraisal which will consider impact of new and reviewed policies on climate change in greater detail.
Efficient and effective use of resources	The Council must have an up-to-date plan; this necessitates a review at least every five years. In commencing the review early (by less than a year). This will enable the life of the current plan to be extended to 2042 and remove the current uncertainty around 'new style' local plans. Some evidence will need updating, but not all. Producing a totally new plan would require significant investment in new evidence base documents. Most work on the review will be undertaken by the planning policy team but some specialist input will be required on topics like employment need, gypsy and traveller need, transport impact etc.
Health and Wellbeing	A key objective of Local Plan and supporting documents is to improve people's health and wellbeing by protecting and improving the economic, social and environmental conditions in the Borough.
S17 Crime and Disorder	The Local Plan has a role in reducing crime through the design and location of development.
Wards Affected	All.
Groups Affected	All.
Budget and Policy Framework	The Local Plan will be prepared using existing budgets and will form part of the Council's Planning Policy Framework.
Key Decision	Yes
Urgent Decision	No

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

10. Local Planning Authorities must prepare a Local Plan that sets out the local planning policies for their local planning authority area. These policies are very 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.

11. In accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, and paragraph 34 of the revised NPPF (December 2024) a further review of the Adopted Darlington Local Plan 2016 - 2036 needs to be carried out by February 2027 at the latest. Paragraph 34 states that *"Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years"* and *"should take into account changing circumstances affecting the area, or any relevant changes in national policy"*. Failure to do this could result in the plan being deemed 'not up to date' and national policy being applied.

12. In March 2026 Cabinet approved a draft update of the plan for consultation. Key amendments proposed in this draft included:

    (a) Extending Plan Period to 2025 – 2042;

    (b) No significant additional housing allocations outside development limits were required;

    (c) Additional employment land needed to be allocated;

    (d) Some policies required minor wording changes, including some to reflect changes in national policy since adoption of the plan in 2022 (including Biodiversity Net Gain);

    (e) New policies were proposed for additional control of Hot Food Takeaways and Gambling Premises within a new 'Healthy Communities' chapter;

    (f) New policies were also proposed for climate change, protecting trees and protecting watercourses.

13. The following table provides a summary of the key amendments proposed to be made to the Draft Local Plan 2025-2042 to address relevant comments received during the public consultation held earlier in 2026. These amendments will be included within the Pre-Submission (Regulation 19) Version of the Local Plan that will, subject to Council approval be published for a further consultation in September/October 2026 prior to submission to the Planning Inspectorate for examination in public by the government deadline of 31 December 2026.

14. A range of other minor changes will also be included in the Regulation 19 Pre-Submission Plan that are not listed here. These include providing clarity in supporting text, amending wording to be consistent with national policy, address typos, update references to documents, evidence, policy and legislation etc. Provision to approve these minor changes under delegated powers is set out in the recommendation of this report.

Policy	**Proposed Change**	**Reason for Change**
DC1 – Sustainable Design Principles	Remove requirement for Building for Healthy Life Assessment	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.
H1 – Housing Requirement	Amend proposed housing requirement from 446 to 490 dwellings per annum	This change is to ensure that, in accordance with the NPPF that the housing requirement aligns with the level of jobs growth proposed of 350 jobs per annum and the continuation of the Council's economic growth aspirations. The requirement will remain effectively the same as the adopted Local Plan housing

		requirement of 492 dwellings per annum. No additional allocations are required to those identified in the Regulation 18 Draft Local Plan due to the buffer in supply already included.
H1 – Housing Requirement	Amend Neighbourhood Housing Area Requirements	Requirements amended to reflect updated housing requirement and updated housing trajectory as completions data for 25/26 now available.
H3 – Housing Mix	Amendments to M4(2) and M4(3) adaptable and accessible homes requirements	Requirements amended slightly to reflect the latest evidence in the updated Local Housing Needs Assessment to reflect the latest household projections data. M4(2) likely to be 59% instead of 57% and M4(3) 7% instead of 8%.
H4 – Self-Build and Custom Build Housing	Increase threshold of requirement of 1% custom and self-build plots from proposals of 150 dwellings to 500 dwellings.	The current threshold would potentially result in the delivery of very small number of plots which is not practicable. A cluster of a minimum of 5 plots is considered appropriate. Most allocated sites are over 500 dwellings or below the existing 150 unit threshold so this change is unlikely to reduce the number of sites this would apply to in any case.
H5 – Affordable Housing	Amendments to the value areas wards are included within, potential changes to the affordable housing requirement and tenure split.	Updates required to reflected updated evidence in the Local Housing Needs Assessment and the Local Plan Viability Assessment currently still being finalised.
H8 – Housing Intensification	Inclusion of additional HMO policy	An additional policy on HMO's is to be included to provide further policy and guidance as an SPD was unable to be adopted prior to the deadline.

H10 - Skerningham	Skerningham will be identified as a mixed use development.	For clarity and to reflect masterplan.
H11 – Burtree Garden Village	Burtree will be identified as a mixed use development.	For clarity and to reflect masterplan.
ENV2 – Stockton & Darlington Railway	Enable rather than support the creation of a walking and cycling route along the S&DR Route.	Address comments from Historic England and the Friends of S&DR to put more emphasis on the creation of the route.
ENV5 – Green Infrastructure Standards	Amend requirement standards to include Natural England Urban Greening Factor and Accessible Natural Greenspace Standard	The Councils current Opens Spaces Assessment and Green Infrastructure (GI) Strategy is out of date and the use of these standards would ensure a more robust and up to date policy ensuring the Council can continue to seek GI provision and contributions.
ENV10 – Trees & Hedges	Re-order policy and inclusion of wherever possible in relation to retention of Trees and Hedges	Amendments required to ensure policy wording is consistent with National Planning Policy.
IN9 – Renewable Energy	Inclusion of policy on Battery Energy Storage Systems	To ensure local policy requirements are included within Local Plan
Appendix A	Housing trajectory will be updated to reflect most up to date position.	To reflect latest available information.
Appendix B	Some updates to Housing and Employment Allocation Statements will be required.	To reflect latest available information.
Appendix E	The affordable housing requirement map will be updated as some of the medium value areas will now become high value areas based on the updated viability assessment work	To reflect updated evidence.

15. A ‘track change’ version of the updated draft plan is included in **Appendix 1.**

16. **Appendix 2** includes an updated version of the Local Plan Policies Maps to reflect the latest draft plan.

17. **Appendix 3** includes a summary of all comments received during the Regulation 18 consultation, officer responses and changes proposed as a result.

Financial Implications

18. Consultation is an integral part of Local Plan preparation and allowances are made within the existing Local Plan Budget to facilitate consultation.

19. The Local Plan is, and will continue to be, key to delivering housing, employment and infrastructure development and is a vital determinant of the future economy of Darlington.

Legal Implications

20. There are no direct legal implications arising from this report. However, it is important the consultation under Regulation 18 is effective and allows stakeholders and local people opportunities to engage in plan preparation.

Carbon Impact and Climate Change

21. Achieving sustainable development is a fundamental objective of the Local Plan. The early review of the existing Local Plan will enable the council to develop additional policy to tackle climate change matters, reflect updated national policy and improve existing policies where necessary.

22. The reviewed plan will be supported by an updated Sustainability Appraisal which will consider impact of new and reviewed policies on climate change in greater detail.

Equalities considerations

23. The Local Plan itself will have regard to equalities considerations. An updated Equalities Impact Assessment will be produced on updated aspects of the plan prior to submission.

Consultation

24. This Consultation under Regulation 19 will allow stakeholders and local people to comment on the legal compliance and soundness of the proposed submission plan before examination by a Planning Inspector.

Outcome of Consultation

25. Once Regulation 19 is complete, an updated draft Local Plan is then submitted to the Secretary of State for the Department for Communities and Local Government. They will then appoint an independent Planning Inspector to undertake a 'public examination' of the draft Local Plan and is likely to make recommendations to further improve it. Comments received during the Regulation 19 consultation are also passed to the inspector for consideration.

26. During the examination process, the Secretary of State and the independent Planning Inspector will use the National Planning Policy Framework and comments submitted during the Regulation 19 consultation to determine whether a Local Plan is sound and legally compliant.

Darlington Borough Council

Local Plan Review 2025-2042

Regulation 19

Draft Version

(Formatting of the document will be updated prior to consultation)

DARLINGTON
Borough Council

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1. INTRODUCTION

1.0.1 This consultation document contains draft policies and proposals for using and developing land throughout the Borough of Darlington.

1.0.2 The Darlington Local Plan 2016-2036 was adopted by the Council on 17th February 2022 and replaced the Darlington Local Development Framework (LDF) Core Strategy (May 2011) and the saved policies of the Borough of Darlington Local Plan (1997, including adopted alterations 2001).

1.0.3 The National Planning Policy Framework states that policies in Local Plans should be reviewed to assess whether they need updating at least once every 5 years and should then be updated as necessary. Reviews should be completed no later than 5 years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. The Council is therefore reviewing the Local Plan to ensure its continued longevity. The reviewed Local Plan will run from 2025-2042.

1.0.4 This version of the plan has been updated having considered all comments received during the initial Regulation 18 consultation undertaken earlier in 2026. Additional evidence has also been prepared and has informed further changes.

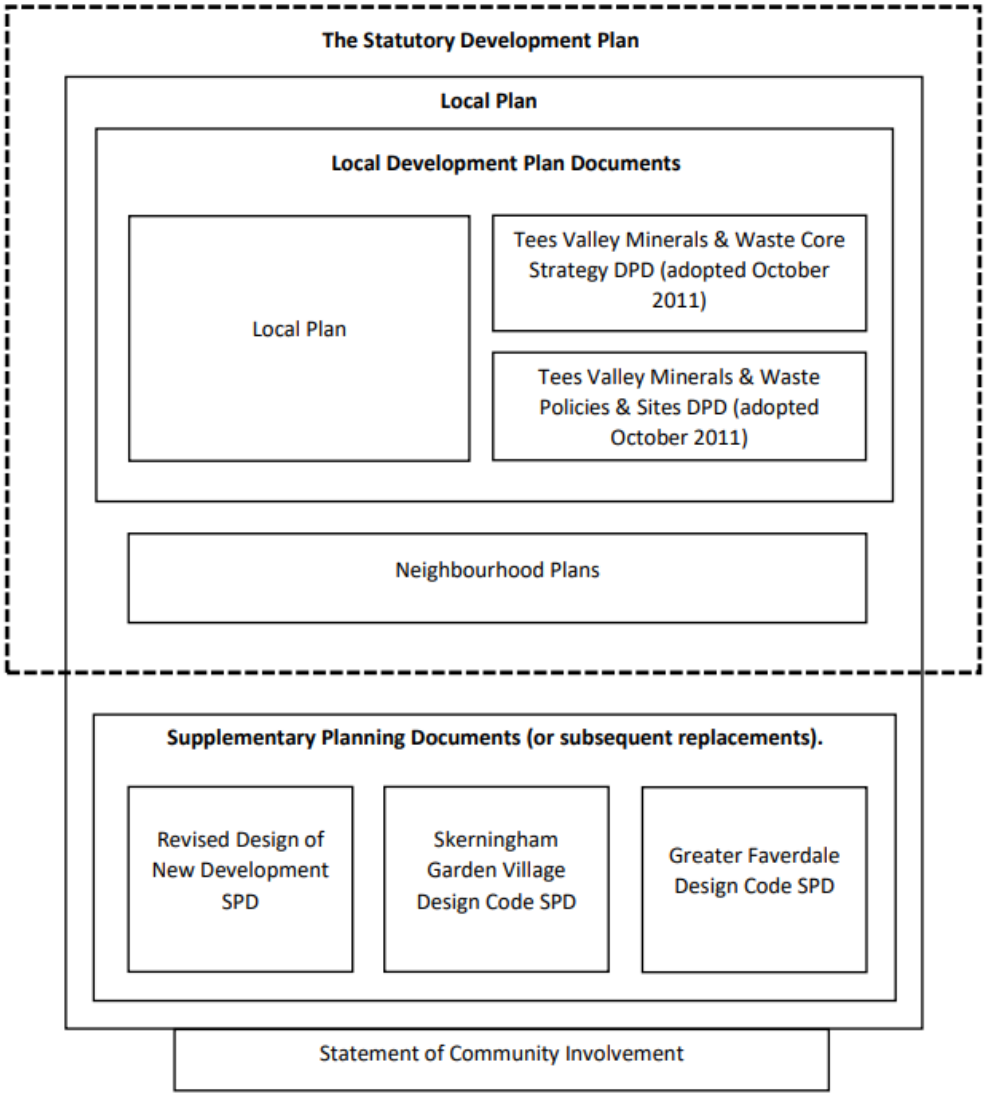
1.0.5 This Consultation under Regulation 19 will allow stakeholders and local people to comment on the legal compliance and soundness of the proposed submission plan before examination by a Planning Inspector. All comments received at this consultation stage are passed to the planning inspector for consideration.

~~Following this consultation, the Council will consider the comments and any other evidence and will write a proposed submission version draft plan. This will be consulted on (under Regulation 19) later in 2026 and will be submitted with comments and other required documents to the Secretary of State by December 2026.~~

1.0.6 All applications for development must, by law, be determined in accordance with the statutory development plan, unless there are material considerations that indicate otherwise. Figure1.1 shows the documents that make up the statutory development plan for Darlington.

Figure 1.1:

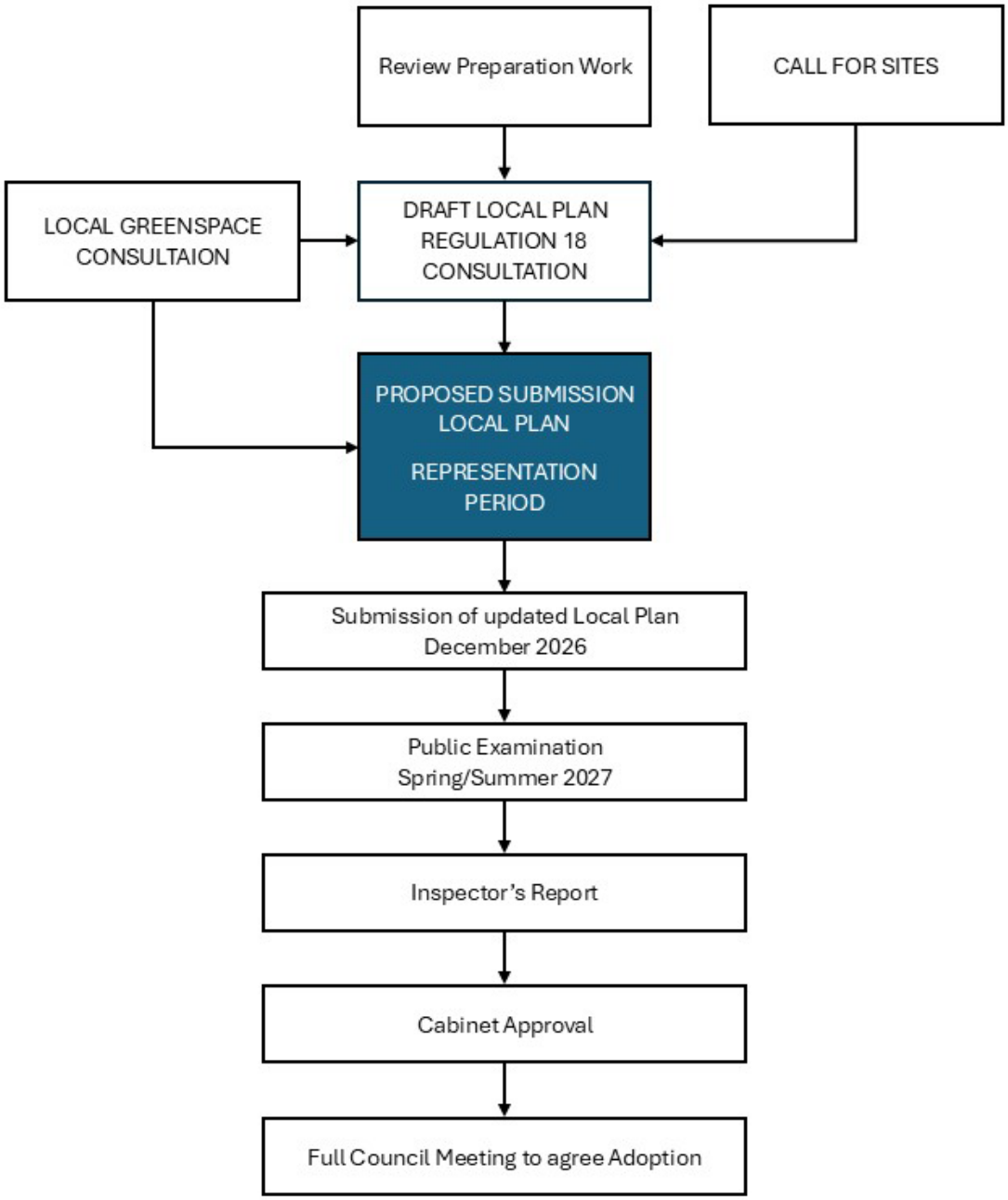
Relationship of the Local Plan to other planning policy documents covering Darlington Borough.



1.0.7 All the policies, proposals and site allocations are designed to address a range of specific issues, problems or challenges. Successful implementation of the policies and proposals in this document will contribute towards economic growth in Darlington and achieving sustainable development. There will be a number of stages involved in updating the Local Plan and these are indicated in Figure 1.2.

Figure 1.2:

Local Plan Review Process



Context

1.1.1 The policies and proposals in this document have been prepared with regard to the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), and sub-regional and local strategies.

1.1.2 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 through providing new housing to meet local needs; it supports the needs of our current and future workforce, and delivers other new developments with provision of key infrastructure.

1.1.3 The Localism Act 2011 introduced a 'duty to co-operate' requiring the Council to work with neighbouring Local Planning Authorities and other key stakeholders on cross-boundary planning issues and matters of strategic concern. The Act also introduced the concept of neighbourhood planning and the implications of this have also been taken into account in the preparation of this document.

Overview of Darlington Borough

1.2.1 Darlington Borough is a unitary local authority area that lies at the western extent of the Tees Valley, a Combined Authority area also comprising the unitary authorities of Hartlepool, Redcar and Cleveland, Middlesbrough and Stockton-on-Tees. The Borough is regarded as ~~the 'gateway'~~ strategically important to the Tees Valley and the wider North East region.

1.2.2 Darlington is a historic market town, surrounded by open countryside with many attractive rural villages. The town's development has been closely associated with the railway age and manufacturing. This includes the internationally significant Stockton and Darlington Railway which was the world's first publicly financed passenger railway and the world's first public railway on which a steam locomotive hauled passengers. This past industrial activity has left a legacy of unused and underused land, but it has also bestowed a wealth of buildings of architectural and historic interest dating from the railway age and the subsequent Victorian period, to complement buildings and urban layouts reflecting the town's Quaker community.

1.2.3 The Borough's range of cultural facilities, such as the Dolphin Centre, Hippodrome Theatre and Hopetown Darlington contribute to a good quality of life and help attract visitors. Hopetown Darlington opened in July 2024, a £37 million project investing in the Borough's rail heritage to create a national visitor destination in Darlington. An abundance of street trees and open space within the urban area contribute to the town's distinctiveness and biodiversity, particularly the green corridors along the River Skerne, Cocker Beck and Baydale Beck. Outside the urban area, a magnesian limestone escarpment forms higher land and a rare ecosystem at the northern fringe of the Borough. An attractive, biodiverse and often wooded landscape has evolved along the River Tees corridor, complemented

by more recent community woodland planting, especially at the urban fringe. The Borough hosts a variety of habitats and species, including some, like the black poplar and the great crested newt, that are rare and/or declining regionally or nationally.

1.2.4 The Borough has excellent national and international transport links by rail (East Coast Main Line), road (A1/M) and air (Teesside International Airport). The town centre provides employment, shops and services for large parts of North Yorkshire, south and west Durham, and the western part of the Tees Valley.

1.2.5 The Borough's current population is approximately 107,800 (Census, 2021). Between the last two censuses, the average (median) age of Darlington has increased by two years, from 41 to 43 years of age. This ageing population is caused by declining birth rates over recent decades and by out-migration of young, well-educated adults seeking better employment opportunities elsewhere. Approximately 20% of the population is over 65 (NOMIS). There are also marked contrasts in the life opportunities of people in the Borough, according to where they live.

1.2.6 The Borough's economy has performed strongly over recent years, shifting from its past reliance on manufacturing to one with a wider, more resilient base. On the ground this can be seen with the opening of a number of 'Storage and Distribution Hubs', including the Amazon Distribution Centre, and an increase in public sector employment with the creation of the Darlington Economic Campus, occupied by numerous government departments, including HM Treasury. Further investment is also committed to the expansion of the Darlington Economic Campus, Darlington Science Park at Central Park, ancillary industries at Teesside International Airport and speculative development of warehousing and commercial premises.

National Planning Policy Context

1.3.1 The Local Plan has been prepared so that it is consistent with the principles and policies set out in the National Planning Policy Framework (NPPF, December 2024), including the presumption in favour of sustainable development.

Council Plan: 2024 – 2027

1.5.1 The Council Plan outlines the Council's long-term ambitions for Darlington. The Council Plan's vision is for Darlington to be one of the best places to live, learn, work and invest in the UK, with a strong and sustainable economy, healthy thriving communities and opportunities for all. It recognises the fundamental link between health, wellbeing and the economy. It is shaped by the building blocks of good health with a focus on a good job, home and social connections.

1.5.2 The key priorities are:

- Economy

- A strong sustainable economy and a highly skilled workforce with opportunities for all.

- Homes
  - Affordable and secure homes that meet the current and future needs of residents.
- Living Well
  - A healthier and better quality of life for longer, supporting those who need it most.
- Children and Young People
  - The best start in life, realising potential and raising aspirations.
- Communities
  - Safer, healthier, and more engaged communities.
- Local Environment
  - A well-connected, clean and sustainable borough.

Other Policies, Plans, Strategies and Studies

1.6.1 The preparation of this document has been informed by policies, plans, strategies and studies prepared by the Council and its partners. Examples include the Tees Valley ~~Strategic Economic~~ Local Growth Plan (~~2016-2026~~) (2026-2036), the Tees Valley Strategic Transport Plan (2020-2030), Draft Tees Valley Local Nature Recovery Strategy, the Darlington Economic Strategy (2016-2026), the Darlington Housing Strategy (2012-2017), Darlington Transport Plan (2022–2030), Darlington Town Centre Transport Plan (2022-2030), Darlington Joint Local Health & Wellbeing Strategy (2025), Darlington Green Infrastructure Strategy (2013-2026), Darlington Climate Change & Nature Strategy (2025-2040), Darlington Tree and Woodland Strategy (2021-2031) and the Tees Valley Joint Minerals and Waste Plan (2011) which includes the Coal Authority's coal legacy and resources register.

Duty to Co-operate

1.7.1 The National Planning Practice Guidance (NPPG) states that co-operation should produce effective policies on cross-boundary strategic matters. The Council considers that the Duty to Co-operate affects Darlington in the following ways:

- Working with neighbouring authorities to identify and address strategic cross-boundary issues.

- Developing an evidence base to support the review of the Local Plan.

- Working with other public and private sector bodies, along with utility and infrastructure providers.

1.7.2 The full list of bodies included within the Duty to Co-operate is specified in the Town and Country Planning (Local Planning) (England) Regulations (2012).

1.7.3 A full statement of the actions taken by the Council under the Duty to Co-operate will be published in Statements of Common Ground alongside the reviewed Local Plan.

Sustainable Economic Growth

1.8.1 The NPPF states that planning should proactively drive and support sustainable economic development to deliver homes, business and industrial premises, infrastructure and thriving local places. The Local Plan 2025-2042 provides that focus with more detailed policies and site allocations, reflecting economic forecasts and priorities identified in the Darlington Economic Strategy (2016-2026) and the Tees Valley ~~Strategic Economic~~ Local Growth Plan (~~2016-2026~~) (2026-2036).

1.8.2 The Local Plan 2025-2042 recognises the contribution that housebuilding makes to the local economy. Land is allocated for approximately ~~5,195~~5,109 homes with an additional ~~3,836~~3,365 (approx.) expected to be delivered via existing planning permissions over the plan period. A range of previously developed land and greenfield sites provide choice both within and on the edge of the urban area and at the large service villages[1].

1.8.3 In order to create Economic Growth through further employment options, sites have to be available and have to be able to be flexibly used for different ranges of sectors and commercial development. Opportunities for further investment in Darlington will be accommodated through a diverse portfolio of sites and locations. Our ambition to achieve ~~6,400~~ 5,998 net additional jobs over the 1~~6~~ 17-year plan period requires suitable locations to grow the economy, which are identified through the Local Plan 2025-2042. This equates to ~~400~~ 353 jobs per annum which is slightly above the 350 jobs per annum calculated in the Employment Land Needs Report (2017), which informed the current adopted Local Plan (2016-2036).

1.8.4 The significant contribution of Darlington Town Centre and retailing to the local economy is also recognised, as is the potential of railway heritage tourism. A Town Centre Strategy (2019-30), the Town Centre Fringe Master Plan (2013) and the Northgate Masterplan (2023) have informed allocations for retail, mixed use, leisure and commercial development.

1.8.5 New development needs to be supported by appropriate infrastructure. This document identifies key investment priorities including highway improvements, vital utility improvements and a new north-south green corridor through the Town Centre Fringe, focused on the River Skerne.

[1] Defined in Policy SD 2

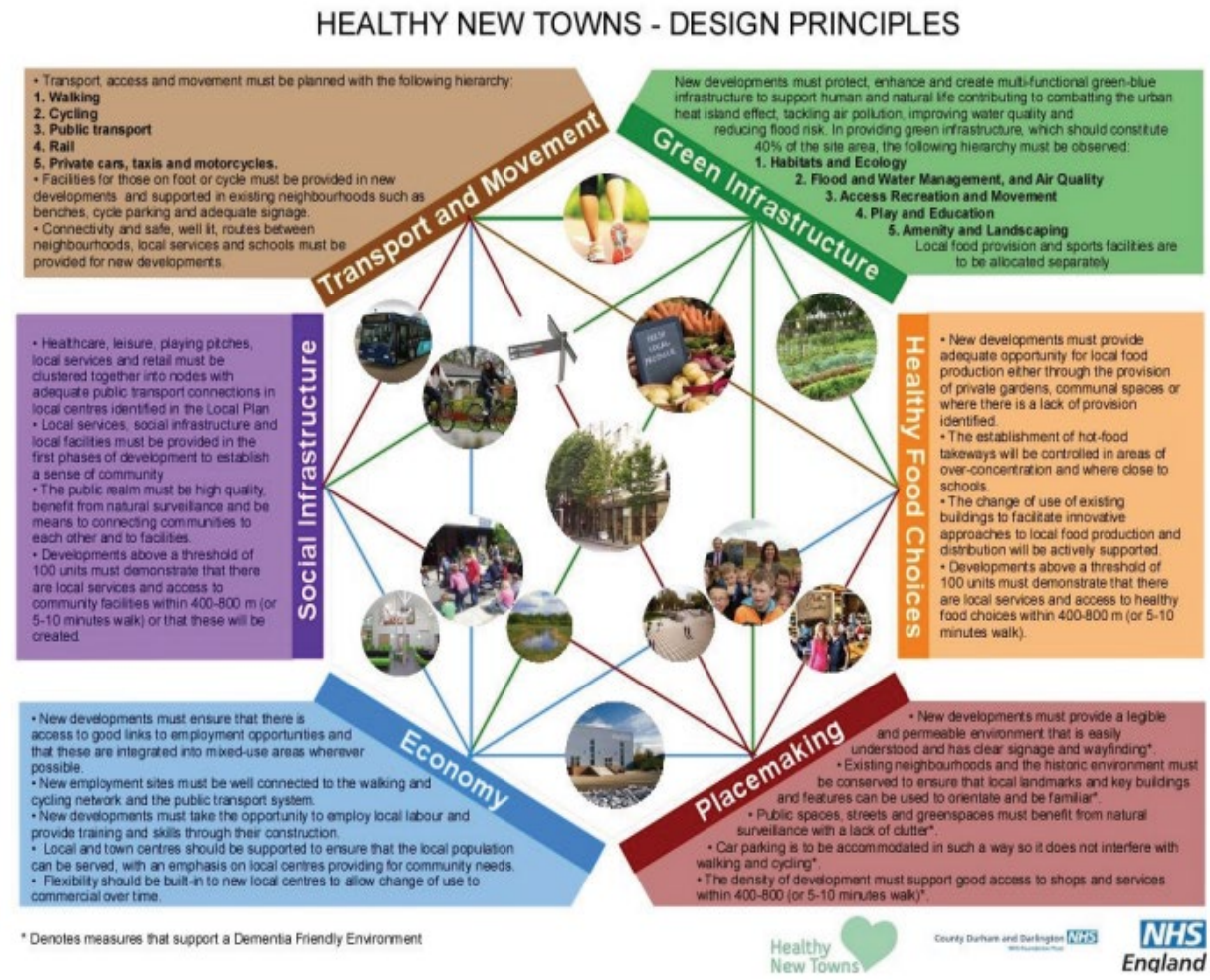
Health & Wellbeing

1.9.1 There is an increasing body of evidence linking the quality of the built and natural environment with health and wellbeing outcomes. Access to greenspace, social infrastructure, active travel choices and the availability of local goods and services are all key determinants of both mental and physical health. The links between planning, the environment and health are being explored by a number of bodies including the NHS, the Office for Health Improvement and Disparities (OHID), the Department for Environment, Food and Rural Affairs (Defra), Local Nature Partnerships and voluntary and community organisations. Both the Royal Town Planning Institute (RTPI) and the Town and Country Planning Association (TCPA) have been actively involved in developing guidance to inform Local Plans and decision making and there is a high degree of commonality between approaches. In the context of an ageing population and lifestyle related disease the importance of planning for health is clear, and the Darlington Local Plan seeks to integrate best practice approaches.

1.9.2 Darlington was an NHS Healthy New Towns pilot site alongside nine others across England. This pilot allowed the sharing of best practice and access to research and development across a number of areas including green infrastructure, design, sustainable transport, placemaking and the public realm. The evidence bases and learning gained through this programme informed policy development across the Plan. Many of the principles were tested with local stakeholders and developers to ensure that they were aspirational, realistic and deliverable.

1.9.3 Within the Local Plan the six Darlington Healthy New Towns Design Principles (see Figure 1.3) have informed the suite of policies, with a particular emphasis on design, green infrastructure and the strategic allocations, to meet the ambition to create a Local Plan that secures better health and wellbeing outcomes for all.

Figure 1.3



Neighbourhood Planning

1.10.1 The Localism Act 2011 gave local communities the power to help decide where development should go and the type and design of development, by preparing neighbourhood plans for their areas. They can be prepared by Town or Parish Councils, or in areas without a parish by Neighbourhood Forums. The Act requires the Borough Council to support work on neighbourhood plans.

1.10.2 Neighbourhood plans must be in general conformity with strategic policies included in the Local Plan, as detailed below:

- SD 1 - Presumption in Favour of Sustainable Development
- SD 2 – Settlement Hierarchy
- SD 3 – Development Limits
- DC 1 - Sustainable Design Principles
- DC 2 – Climate Change

- DC 3 – Flood Risk and Water Management
- HC 1 – Health and Wellbeing
- H 1 - Housing Requirement
- H 2 - Housing Allocations
- H 3 – Housing Mix
- H 5 - Affordable Housing
- H 6 – Rural Exception Sites
- H 7 - Residential Development in the Countryside
- ~~H 9 – Gypsy and Traveller Accommodation~~
- H 10 - Skerningham Strategic Allocation
- H 11 – Burtree ~~Garden Village~~ Strategic Site Allocation
- H 12 – Gypsy and Traveller Accommodation
- E 1 – Safeguarding Existing Employment Land
- E 2 - Employment Allocations
- E 3 - Economic Development in the Open Countryside
- TC 1 – Darlington Town Centre
- TC 4 – District and Local Centres
- TC 5 – Retail Impact Assessment Threshold
- 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
- ENV 8 – Assessing a Development's Impact on Biodiversity
- ENV 10 – Trees and Hedges
- ENV 11 – Nutrient Neutrality
- IN 1 - Delivering a Sustainable Transport Network
- IN 2 - Improving Access and Accessibility
- IN 3 – Transport Assessment and Travel Plan
- IN 5 – Airport Safety
- IN 6 - Utilities Infrastructure
- IN 8 – Broadband Infrastructure
- IN 9 - Renewable and Energy Efficient Infrastructure
- IN 10 - Supporting the Delivery of Community and Social Infrastructure

1.10.3 Once made, Neighbourhood Plans become part of the statutory development plan. There are currently two made Neighbourhood Plans in the Borough:

- Low Coniscliffe & Merrybent Parish Neighbourhood Plan (2018 – 2036).
- Middleton St George Neighbourhood Plan (2022-2036).

Further plans may be made in due course and become part of the Development Plan for Darlington.

Viability and Deliverability

1.11.1 Nationally, planning policy highlights the importance of ensuring plans are deliverable. It states that policies, planning conditions and obligations should not undermine the deliverability of the plan[2]. The National Planning Policy Framework (NPPF)[3] also states that: “where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable". Viability assessments should be undertaken at plan making stage and should reflect the recommended national approach set out in National Planning Practice Guidance. It will be up to applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. If so, this should be based upon, and refer back to, the Local Plan Viability Assessment and will be made publicly available.

1.11.2 National policy highlights the need for local authorities to take account of changes in market conditions over time and notes there is a degree of flexibility required within the planning policy framework, to prevent planned development being stalled.

1.11.3 In negotiating planning conditions early, the overall sustainability of schemes is paramount, and conditions should be kept to a minimum as outlined in national policy[4]. These established considerations of conditions will have to inform any negotiations on planning obligations.

[2] NPPF, Dec 2024, Para 35

[3] NPPF, Dec 2024, Para 59

[4] NPPF, Dec 2024, Para 57

Sustainability Appraisal and Habitats Regulations

1.12.1 The Local Plan must be subject to ongoing Sustainability Appraisal (SA) throughout its preparation, including specific consideration of environmental, health, equalities and rural impacts. This seeks to identify the likely impacts and how they might be addressed to ensure the effectiveness of this document in achieving economic, social and environmental goals. The SA has been used in a proactive way to help shape emerging themes, objectives and actions. An updated SA report ~~will be~~ is published to accompany ~~the~~ this Regulation 19 Proposed Submission Local Plan.

1.12.2 Alongside the SA, a Habitats Regulations Assessment (HRA) Screening Report ~~is~~ has ~~being~~ been prepared. The purpose of the HRA is to identify whether the proposed policies set out within the Local Plan, either alone or in combination with other plans and projects, are likely to have an adverse effect on the integrity of any ~~Natura 2000~~ European Sites. The requirement to carry out this assessment is set out within the Conservation of Habitats and Species Regulations. The HRA Screening Report concludes that some of the Local Plan policies are ~~is not~~ likely to give rise to ~~any negative impacts~~ significant adverse effects 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.~~ The Teesmouth and Cleveland Coast Special Protection Area and Ramsar. A HRA Appropriate Assessment was undertaken and this has concluded that with mitigation through the inclusion of Policy ENV11 in the Local Plan none of the policies or site allocations would result in harm to the integrity of a European site or its conservation objectives. This also took in to account in-combination effects with other relevant plans and strategies.

2. VISION, AIMS and OBJECTIVES

Local Plan Vision

2.1.1 The Vision for the Local Plan, set out below, reflects comments made during the Strategic Issues and Scoping consultation process and sets out what the Plan is seeking to achieve.

'In 2042, Darlington Borough will have maintained its identity as a cohesive historic market town situated amongst countryside and villages, whilst developing its reputation for ingenuity and its status as an economic driver in the Tees Valley. Its coherent community, natural and historic environment will be enhanced and will continue to be cherished, protected and celebrated. Work between the Council, government, public and private sectors and residents will have created a resilient town able to respond and adapt to climate change. Residents of Darlington will be healthier and will experience a better quality of life for longer. The opportunities available in Darlington and its links with other centres will make the Borough an attractive place for both residential and commercial investment, with the Borough's needs for housing, jobs and other development being met, supported by new and improved built and green infrastructure and community facilities. Together, with excellent national and regional connectivity and accessibility, these characteristics will mean Darlington continues to thrive and be a great place to live, work and invest.'

2.1.2 The following Aims and Objectives will provide the link between the Vision and the spatial strategy. They represent a translation of the Vision into specific themes and what this will mean for place making in the Darlington context if it is to be successful.

Overarching Aims

- Deliver sustainable development to meet the Borough's needs through a cohesive plan which makes the best use of land and resources.
- Protect and enhance the quality of Darlington's built, natural and historic environment, and to use it positively to create great places.
- Deliver new development that is capable of facilitating local or strategic infrastructure.
- Contribute to the satisfaction, fulfilment, health and wellbeing of the population of the Borough.

Specific Aims and Objectives

1. **Facilitating Economic Growth – facilitate sustainable economic growth of ~~6,400~~ 5,998 new jobs within the Borough.**

   In order to deliver this Aim we have the following Objectives:

   a) Create the conditions to attract and retain investment, with a range and continuous supply of employment development opportunities in sustainable locations.

   b) Provide a choice and range of sites capable of delivering this growth. These will include established areas of existing economic development but will also be flexible enough to be responsive to accommodate growth industries or the changing needs of established sectors.

   c) Support clusters of economic activity in the context of the Tees Valley ~~Strategic Economic Plan~~ Local Growth Plan and the Council's Economic Strategy.

   d) Promote Darlington Town Centre as the main location for shopping, leisure, culture and employment and strengthen its role as a regional centre for such activities.

   e) Diversify the rural economy to support businesses and existing communities whilst also protecting the Borough's valued open countryside.

   f) Facilitate the delivery of strategic infrastructure that supports economic growth, including the supply of appropriate housing.

2. **Meeting Housing Needs – enable the development of ~~9,031~~8,474 new homes in order to meet the housing needs and aspirations of those living and working in the Borough.**

   In order to deliver this Aim we have the following Objectives:

   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.

   b) Achieve and maintain a 5-year supply of housing land.

   c) Provide a range of housing products providing types and tenures of homes suitable for all people, including people who are unable to access housing on the open market and for the Borough's ageing population.

   d) To have a portfolio of sites of different sizes, different housing products and delivery rates for the short, medium and long term.

3. **A Well-Connected Borough – to capitalise on Darlington's excellent existing connections to the national strategic transport network and seek improvements to regional connectivity across the Borough. New development that supports delivery of key infrastructure and a sustainable pattern for growth will be supported.**

   In order to deliver this Aim we have the following Objectives:

a) Ensure that new development is in places where it will be ~~reasonably~~ accessible by public transport, cycling and walking.

b) Maintain and improve transport links between communities within the Borough and further afield.

c) Support development that enhances regionally and nationally important transport links including those offered by Darlington Station, Teesside International Airport, Teesport and the Strategic Road Network.

d) To improve the local highway network by managing our strategic highway demands.

e) Delivery of communication infrastructure, including broadband, to enhance business and social interaction.

4. **Create Cohesive, Proud & Healthy Communities – create and support cohesive communities through good place-making to achieve lively, well-located and distinctive places with an increased sense of civic pride.**

In order to deliver this Aim we have the following Objectives:

a) Protect, maintain and enhance Darlington's historic environment and identity as a historic market town, set amongst countryside and surrounding villages with strong links to ~~Railway,~~ Quaker, ~~and~~ Industrial and internationally significant Railway heritage.

b) Maintain a vibrant, attractive and safe market town centre that embraces its historic character whilst functioning as a modern centre offering retail, culture, leisure, tourism and employment opportunities.

c) Secure provision of necessary infrastructure to support growth including improvements to existing services.

d) Ensure convenient access to local goods and services.

e) Ensure residents have reasonable access to education facilities within the Borough and where necessary developers should contribute to the provision of education facilities in sustainable locations.

f) Improve access to green spaces for leisure and recreation.

g) To build healthier homes and environments that support independence at all stages of life.

h) Tackle unhealthy environments by creating ~~walkable~~ active travel neighbourhoods, delivering improved infrastructure for safe, active travel and more accessible public transport.

i) Create connected neighbourhoods, with local social infrastructure and inclusive public spaces that enable people of all ages and abilities from all backgrounds to develop strong communities.

j) Create healthy workplaces, schools and leisure facilities that make the most of opportunities to encourage physical activity, healthy eating and positive mental health and wellbeing.

5. **Protect, Restore and Enhance the Countryside and Natural Environment – maintain and enhance the biodiversity, character and appearance of the countryside and wildlife habitats.**

In order to deliver this Aim we have the following Objectives:

a) Development within and around existing urban areas will be expected to protect, and add to, the Borough's rich and accessible existing Green Infrastructure network.

b) Improve the amount of quality accessible greenspace where deficiencies in provision are identified.

c) Protect and enhance biodiversity and support nature and habitat restoration across the Borough.

d) Mitigate flood risks through environmental and ecological improvement of the River Skerne and River Tees and their tributaries.

e) Improve the connectivity of habitats through the creation and/or enhancement of corridors and stepping stones.

6. **Responding to Climate Change and Reducing Energy Consumption – support the national commitment for net zero carbon and greenhouse gas emissions by 2050 through the continued move towards a net zero carbon community by encouraging efficient use of resources, good design and well-located development, whilst increasing resilience to impacts from climate change.**

In order to deliver this Aim we have the following Objectives:

a) Manage flood risk from all sources.

b) Maximise opportunities to generate and use renewable energy in all developments.

c) Actively encourage energy and water efficient design in all new and existing housing, industrial and commercial developments.

d) Locate development in areas not susceptible to flooding and encourage flood resilient design where necessary.

3 SUSTAINABLE DEVELOPMENT

Presumption in Favour of Sustainable Development

3.1.1 The NPPF requires policies in local plans to follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.

3.1.2 Policy SD 1 will help to ensure that decisions are made in line with the presumption in favour of sustainable development.

Policy SD 1

Presumption in Favour of Sustainable Development (Strategic Policy)

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Darlington Borough.

Planning applications that accord with policies in the development plan([5]) will be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, the Council will grant planning permission unless:

- the application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed, or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

This policy will be implemented and monitored by making and reviewing decisions on planning applications.

The Settlement Hierarchy

3.2.1 There is a need to make clear 'spatial' choices for the distribution of new development across the Local Plan area, thereby reflecting and supporting the specific roles and functions of different communities, helping “place-shaping” and ensuring that they are linked by sustainable ~~patterns of~~ transport. Failure to respect the scale and function of places can lead to inappropriate development and result in unsustainable patterns of transportation, loss of environmental

[5] The Darlington Borough development plan consists of the Local Plan, Tees Valley Joint Minerals and Waste Core Strategy Development Plan Document (DPD), Tees Valley Joint Minerals and Waste Policies and Sites DPD and made neighbourhood plans.

quality and local character, reduced economic prosperity and be a barrier to social inclusion and the creation of balanced communities.

Policy SD 2

Settlement Hierarchy (Strategic Policy)

The broad distribution of development in the Local Plan area will be shaped by the role and function of places, based on the following hierarchy of settlements:

1. **Darlington Urban Area** - will remain the focus of future development within the Borough. As a single urban centre within the Borough it will aim to maintain its role as a leading sub-regional centre for transport connectivity, services, employment and retail and leisure. Sustainable and accessible locations will be selected to enable further development.

2. **Service Villages (Heighington, Hurworth and Middleton St George)** - will be maintained as villages that offer a range of facilities and services, where a level of development will meet local needs and facilitate the economic diversification of rural areas. Development should safeguard and reinforce the distinctive character of each settlement and not detract from their landscape setting.

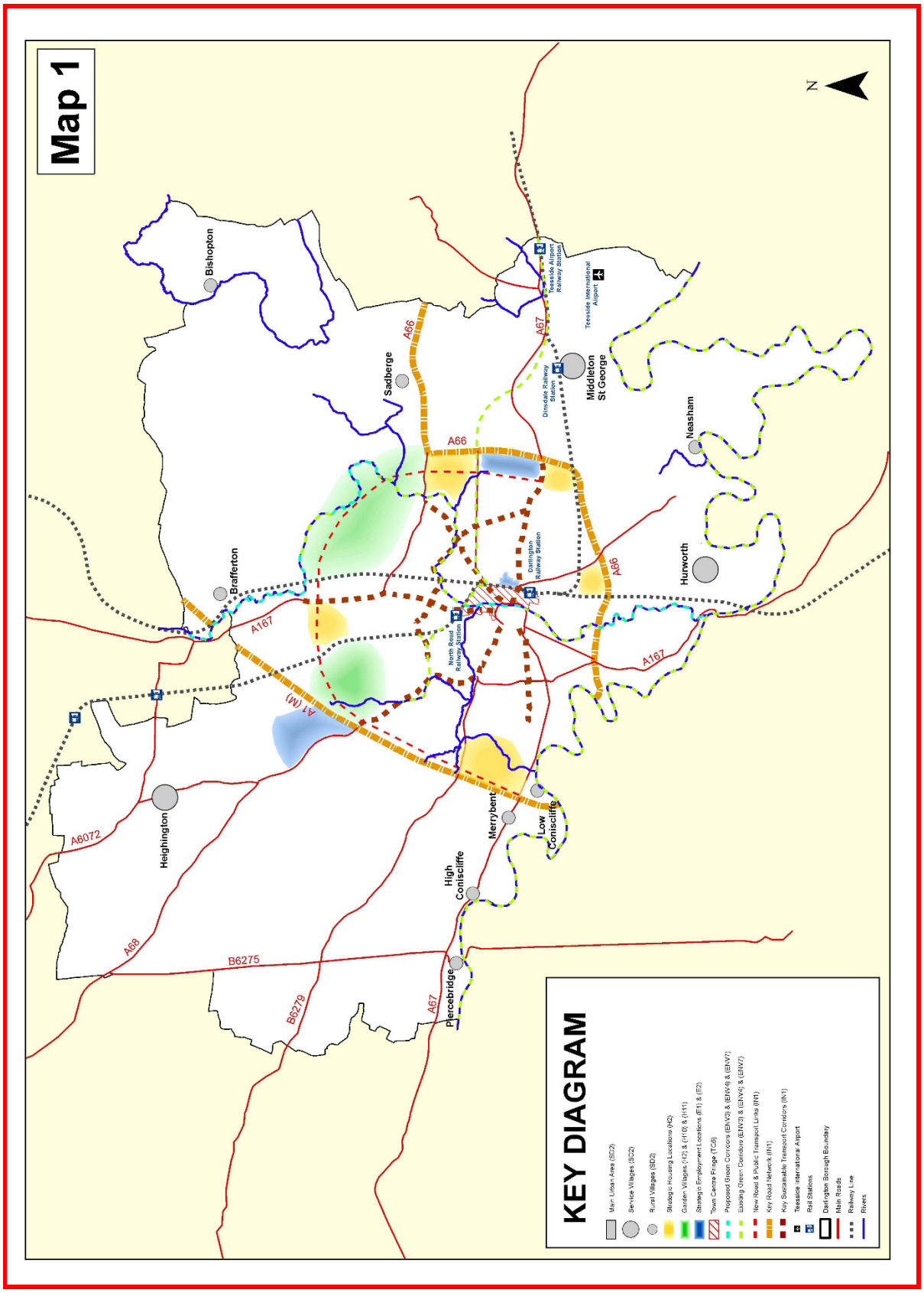
3. **Rural Villages (Bishopton, Brafferton, High Coniscliffe, Low Coniscliffe, Merrybent, Neasham, Piercebridge, Sadberge)** - The character of the Rural Villages, including their relationship to and setting within the surrounding countryside, will be protected and where possible enhanced. Development in these villages will make efficient and sustainable use of existing buildings and infill opportunities. On the edges of Rural Villages, housing development will meet clearly identified local affordable housing needs, recognising that an element of open market housing may be required to deliver essential affordable units.

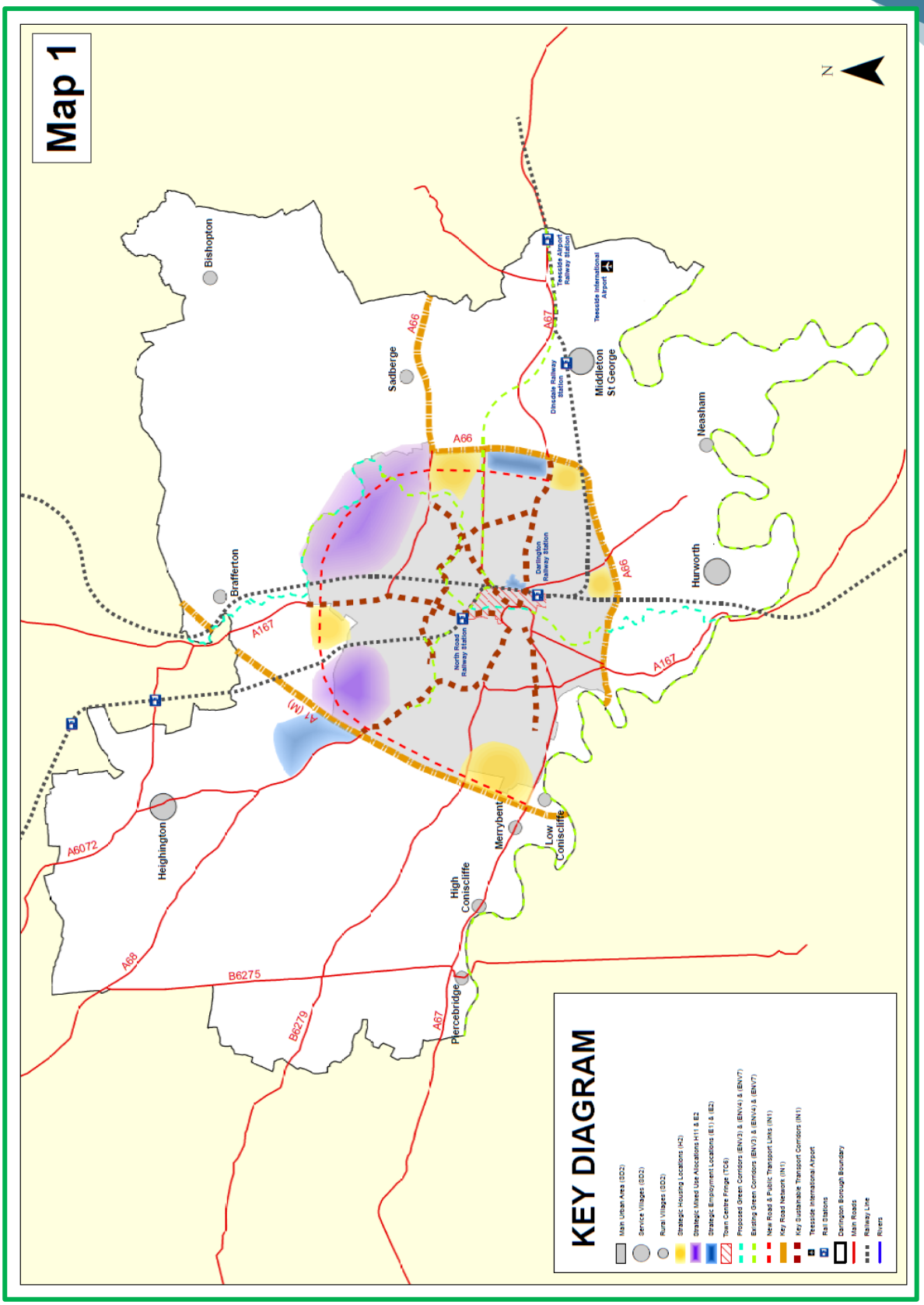
In meeting the objectives for each level of the settlement hierarchy, development should not compromise the ability to meet the objectives for other tiers in the hierarchy.

Only those places with defined Development Limits are classified as settlements for the purposes of this Policy. All areas outside the Development Limits are to be regarded as 'countryside' unless specifically identified for other uses in the plan (including Policies E 1 and E 2). The Development Limits are defined on the Policies Map.

3.2.2 The Key Diagram shown overleaf identifies the key strategic locations for development.

Map 3.1 Key Diagram




Map 1
N
Bishopton
Sadberge
Middleton St George
Neasham
Hurworth
Brafferton
Heighington
Merrybent
Low Coniscliffe
High Coniscliffe
Piercebridge
A66
A67
A167
A1 (M)
A6072
A68
B6275
B6279
Teesside International Airport
Darlington Railway Station
North Road Railway Station
KEY DIAGRAM
Main Urban Area (SD2)
Service Villages (SD2)
Rural Villages (SD2)
Strategic Housing Locations (H2)
Strategic Mixed Use Allocations H1 & E2
Strategic Employment Locations (E1) & (E2)
Town Centre Fringe (TC6)
Proposed Green Corridors (ENV3) & (ENV4) & (ENV7)
Existing Green Corridors (ENV3) & (ENV4) & (ENV7)
New Road & Public Transport Links (IN1)
Key Road Network (IN1)
Key Sustainable Transport Corridors (IN1)
Teesside International Airport
Rail Stations
Darlington Borough Boundary
Main Roads
Railway Line
Rivers

Urban Area

3.2.3 Darlington has excellent national and international transport links, by rail (East Coast Main Line), road (A1M) and air (Teesside International Airport). Its 'gateway' location, accessibility and attractive environment make it perfectly placed within North East England and the Tees Valley to attract investment and economic activity that might not otherwise come to the region or sub-region. It is a key centre within the Tees Valley City Region, with potential to contribute significantly to regional economic growth across a range of sectors.

3.2.4 Darlington is an important location for employment development, a sub-regional centre for retail and leisure uses, and a strategic public transport hub. The town centre provides employment, shops and services for large parts of North Yorkshire and South and West Durham and the western part of the Tees Valley, and is rated third in North East England in terms of shopping venue quality[6] . The Borough provides housing to meet the needs of local people and many of those who work in the town and also helps to meet some of the housing needs of a wider area, particularly those arising from those on higher incomes working across the Tees Valley.

3.2.5 ~~New~~ Land will be required for the employment, services, infrastructure and new housing associated with population and economic growth. Priority will be given to land and buildings in accessible and sustainable locations, where these can accommodate the specific needs of the developments proposed, and where this does not prejudice heritage or nature conservation or impinge on land protected for recreational purposes.

3.2.6 The town centre will continue to be the primary retail centre in the Borough. It will be enhanced and safeguarded as such and will be expected to accommodate additional mixed-use development for much of the plan period. The Council accepts that the face of retail~~ing~~ is changing and the roles of town centres need to change to reflect that, with a more flexible approach to uses within the high street, including encouraging people to live in town centres. The town centre will also continue to be a key location and first priority for office development and other town centre uses, including an office-led scheme on previously developed land in the East Street area.

3.2.7 New development and regeneration in the Town Centre Fringe, including the new Civil Service office at Brunswick Street, will be key to delivering the vision for Darlington over the medium to longer term. The area is critical to improving links between the town centre, Central Park and the main railway station, which are all close by. It provides opportunities for new employment, leisure/culture, recreation and housing in a highly accessible location, and for local pockets of deprivation, poor housing and environmental quality to be tackled comprehensively. Development will have to take into account constraints (such as flood risk) which will shape the eventual pattern of redevelopment there.

[6] Venuescore 2016

3.2.8 In selecting the broad locations for new housing development, the urban fringe has been identified as the most sustainable, suitable, available and developable, provided that appropriate community infrastructure and sustainable transport provision is made and potential adverse impacts of development there are mitigated.

Outside the Urban Area

3.2.9 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, whether it be by retaining services or supporting new development, such as affordable housing, that help to maintain sustainable communities. The larger villages of Heighington, Hurworth/Hurworth Place and Middleton St George have a range of services which means they are well placed to accommodate some development which would also assist in providing for a range of sites within the Borough.

3.2.10 Service Villages are those that provide a core set of essential services for local communities. They must contain a school, village/community hall, and convenience store. It is also essential that they are well connected to higher service centres (towns) by public transport.

3.2.11 Given that the Service Villages are shown to contain essential facilities and services, they are considered to be locations where development opportunities may be acceptable. As centres for activity in the rural area, Service Villages can also play a role in providing small-scale employment opportunities outside of the traditional rural industries. Developments that enhance this role should be supported.

3.2.12 The Rural Villages are generally of a very small scale and offer limited, and in some cases, no service provision. Sustainable development opportunities within the defined Development Limits of these villages will be supported, including infill development and the conversion of existing buildings. New housing development on the edge of Rural Villages (outside the defined Development Limits) will be required to meet local and other functional needs, i.e. through the delivery of 'exception(s) sites' (affordable housing schemes), allowing for an element of open market housing where this helps the viability and deliverability of an exception(s) site as a whole. Housing development that meets a functional need includes that which provides essential accommodation for those involved in land management or other countryside activities. The development of new services will be supported. However, the growth of Rural Villages as a sole means of generating additional demand for services will not be supported where such growth would have an adverse impact on the character of the village, or on the viability of a service in a nearby village.

Development Limits

Policy SD 3

Development Limits (Strategic Policy)

Development within the limits identified on the Policies Map will be acceptable in principle subject to compliance with other relevant national and local policies.

3.3.1 Development limits are a planning policy tool in the Local Plan, to help to achieve the locational strategy for new development. The Local Plan's aims and objectives set out that development will be expected to be in sustainable locations, within and around existing urban areas in order to protect the Borough's green infrastructure network. The development limits help preserve the distinctive identities of existing settlements, protect the open countryside between settlements and preserve the countryside's intrinsic character and beauty. There are a number of other non-housing allocations beyond development limits that are considered appropriate locations for their identified use (Policies E1 and E2).

3.3.2 The limits, defined through Policy SD 3, will provide more certainty as to where development will or will not generally be permitted.

3.3.3 Work to identify where the edge of the built-up area ends and the countryside begins has been undertaken in the preparation of these limits to development. This has taken into account factors such as the nature of the land use or building and whether it would be typically located within the urban area or the countryside. The limits follow clearly defined permanent features such as walls, fences or roads, wherever possible.

3.3.4 The development limits have been drawn to include areas identified for future planned growth of housing and employment adjoining the urban area, such as Skerningham, Burtree ~~Garden Village~~, West Park ~~Garden Village~~ and Great Burdon. In addition to the main urban area a similar exercise has been undertaken for the Borough's villages. It should be noted that not all of the Borough's villages have development limits. In these areas policies relating to development in the countryside will apply.

4 SUSTAINABLE DESIGN AND CLIMATE CHANGE

Sustainable Design

4.1.1 The National Planning Policy Framework (NPPF) states that "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities". One of the overarching aims of this Local Plan is to 'create great places' in which to live, work and invest - the key to achieving this is through promoting good design principles. New buildings and public spaces should reflect these principles and seek to enhance the local character and distinctiveness of the area, whilst also reducing energy consumption and carbon emissions. Development proposals should have regard to the principles in the National Design Guide and Darlington Design of New Development SPD in considering design. The Darlington Design of New Development SPD is in the process of being updated to reflect latest national standards, and the latest national guidance should take precedence in the interim.

Policy DC 1

Sustainable Design Principles (Strategic Policy)

Good design is required to create attractive and desirable places where people want to live, work and invest. All development will be required to have regard to the design principles in the Darlington Design of New Development SPD[7] and National Design Guide (or successors) by demonstrating that:

a. An analysis of the constraints and opportunities of the site and the function of development has informed the principles of design, including;

   i. that the proposal has a clear and distinct identity that responds to the local character and environment.

   ii. that the detailed design responds positively to the local context, in terms of its scale, form, height, layout, materials, colouring, boundary treatments, fenestration and architectural detailing;

   iii. that the proposal has taken account of the need to safeguard or enhance important views and vistas, having regard to their significance and the wider benefits of the proposal; and

   iv. the layout of the development maximises opportunities for natural surveillance, and routes and public spaces are overlooked.

[7] Revised Design of New Development Supplementary Planning Document, Darlington Borough Council, July 2011 (or subsequent replacement).

b. The proposal provides suitable and safe vehicular access and suitable servicing and parking arrangements in accordance with Policy IN 4. Parking should be arranged to avoid streets and spaces becoming visually dominated by vehicles. Long, uninterrupted runs of parking spaces or large un-landscaped areas of grouped parking should be avoided.

c. 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 and natural environment, retaining and enhancing the ecological, landscape and recreational value of existing features of interest such as watercourses. Proposals should feature native and/or naturalised tree types and plant species characteristic of the area.

d. Private and communal amenity space is well-defined, defensible and appropriate in its design, size and location to the needs of its users.

e. 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 including watercourses and groundwater.

~~All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated.~~

Extensions

Extensions, additions and alterations must be subservient to the original building and should respect its scale, form, proportions, character and appearance, and that of the locality. Extensions or alterations that would harm the character and appearance of the original building or the surrounding area will be refused.

Extensions should not result in overdevelopment of the plot. Adequate space should be retained around the extended building for circulation, parking (where necessary) and amenity space (for dwellings).

Shopfront Design

The design of shopfronts should enhance the character and legibility of the street and complement the character of the building they are part of. This includes the overall scale and proportions of the shopfront as well as the materials and colours used in construction. Fascia signs and projecting signs should not be overly large and should be designed to be appropriate to the scale, character and design of the shopfront. Proposals for projecting signs also need to address any highway safety issues.

Design Fundamentals

4.2.1 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'. In turn this improves the quality of

the built environment, its public spaces, its heritage and local distinctiveness, which all contribute to the community's quality of life.

4.2.2 Developers will be required to carry out contextual site surveys, which should be used to inform the design concept. Applicants should be able to demonstrate how good design principles and adopted design policy have been applied in terms of influencing the function, scale, detailing and character of development in addition to the materials used in construction and the quality of the public realm. This should include consideration of the Revised Design of New Development SPD[8]. Innovative design solutions will be encouraged where appropriate within the context of the other policy provisions within this plan.

4.2.3 Housing developments have in recent decades been criticised for their uniform and standardised appearance. In order to avoid creating homogeneous and sterile neighbourhoods, developers will be required to incorporate a mix of property types of a varying scale, utilising a range of complementary materials wherever possible. Similarly, the layout of development should encourage integration with surrounding areas and not be inward facing.

4.2.4 Proposals for the extension or alteration of existing buildings should respect the character and scale of the original building, drawing reference from the materials and detailing used in the original building and ensuring that the original building remains the principal feature of development. However, it is recognised that the use of alternative materials and detailing in extensions and alterations can, in some cases, enhance the character of an existing building and / or the surrounding area. The Local Planning Authority will encourage contemporary and innovative design solutions that enhance local character. For extensions and alterations to residential properties, proposals will be required to accord with the appropriate design guidance.

4.2.5 Access and parking are also dealt with elsewhere in the plan in Policy IN 2 and Policy IN 4, however they also have design considerations so these policies should be considered in tandem. Parking should be well-designed and located, so that it is convenient and accessible, but does not lead to streets and spaces becoming visually dominated by vehicles. A variety of parking solutions should be used within larger developments to minimise the visual impact of vehicles within the street scene. Parking areas should be thoughtfully landscaped and their visual impact minimised, paved with a variety of robust standard materials, and provide clear and accessible routes for pedestrians.

4.2.6 Physical Infrastructure, such as utilities and telecommunications including broadband provision, also need to be included in the design for new developments and are covered in the plan under the physical infrastructure section.

[8] Revised Design of New Development Supplementary Planning Document, Darlington Borough Council, July 2011 (or subsequent replacement)

Public Realm

4.2.7 ‘Public realm’ refers to the publicly accessible areas between buildings; the streets, paths, squares and parks that people use and move through on a day-to-day basis. Ensuring a high-quality, safe and accessible public realm is an essential part of creating environments that people want to live, work and invest in.

4.2.8 Developers will be required to demonstrate a clear and understandable relationship between the design of the public realm and the surrounding built and natural environment, building upon local character and distinctiveness and reinforcing the sense of place.

4.2.9 The public realm should be accessible to all members of the community and maximise opportunities for pedestrians and cycling within, to and from development. Within larger developments the public realm should also be considered as a wider network of publicly accessible spaces, which should be linked together in order to create sustainable and accessible neighbourhoods.

4.2.10 The design of the public realm can help to promote safe communities by limiting the opportunities for crime and anti-social behaviour to take place. To this end, where appropriate, new development proposals will be required to demonstrate the application of ‘Crime Prevention through Environmental Design’ and ‘Secured by Design' principles, which look at the following aspects of development as a means of creating safe environments:

- Environmental quality
- Natural surveillance
- Access and footpaths
- Green infrastructure provision; and
- Lighting.

4.2.11 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.

Development on Brownfield sites and land which may be affected by contamination

4.2.12 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 permitted only if the applicant can demonstrate that the site is or will be made safe for the proposed development and surroundings.

4.2.13 The Council will have regard to Government and other appropriate regional guidance and the Darlington Contaminated Land Inspection Strategy (June, 2021) 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.

Shopfront Design

4.2.14 Shopfronts and their associated advertisements play a vital role in determining the character of retail centres and shopping streets, primarily because they are the section of the building which has direct interface with the public realm and an immediate relationship with the human scale. Additionally, changes to shopfronts can have a significant impact not only on the appearance of a building and the surrounding retail area but also on the economic vitality and viability of the area. Highway safety is also a significant consideration. The design of new shopfronts, therefore, needs careful attention. The key aim is to ensure that shopfronts are not designed in isolation but are considered as an important part of the building in which they are housed. The design of the shopfront should be informed by the architectural style and character of the building and the framework provided by the building within which the shopfront can be integrated. Consideration should also be given to the design of neighbouring shopfronts to ensure that any new design fits harmoniously into its surroundings.

Climate Change

Policy DC 2

Climate Change (Strategic Policy)

Good design and sustainable approach to construction will help reduce carbon emissions and ensure resilient development that mitigates and adapts to the effects of climate change.

1. To mitigate climate change, development proposals will need to demonstrate how they have implemented the following principles and requirements:

   a. All development proposals should minimise carbon emissions and demonstrate within an energy statement (part of the Design and Access Statement) how the design will: ~~the following energy hierarchy (in order of preference) has been embedded within the design of buildings;~~

      i. Minimise energy demand and use through the layout, massing, orientation and design of buildings and use of landscaping (where these factors are not otherwise constrained);

      ~~ii. Maximise energy efficiency using the 'fabric first approach';~~

      iii. Maximise opportunities for on-site renewable energy generation and storage ~~on site~~; and

      iv. ~~Utilise~~ Link to renewable and low carbon energy sources.

b. All development proposals should demonstrate, within an Energy Statement (part of the Design and Access Statement), the actions taken to minimise embodied carbon emissions. This should include the measures to be implemented to minimise the use of high embodied carbon materials and maximise the use of low embodied carbon materials and reclaimed materials and, where applicable, the re-use of existing buildings, structures, hard surfaces and infrastructure. Residential developments of 150 homes or more, and non-residential development of 10,000 sqm floorspace or more, should undertake an embodied carbon assessment to calculate ~~their~~ the proposals embodied carbon emissions which follows the 'RICS Whole Life Carbon Assessment for the Built Environment' methodology ~~through a nationally recognised methodology~~ and demonstrate the actions ~~being~~ been taken in the design process to reduce these.

c. All residential development proposals are required, as a minimum, subject to transitional provisions in Building Regulations, to meet the energy efficiency requirements set out in the building regulations Future Homes Standard (2026), or successor standards. ~~Should the standards not be incorporated in to building regulations prior to the adoption of the Local Plan, the standards set out in the Future Homes and Building Standards: 2023 consultation will be required~~; Where a proposal exceeds the energy efficiency requirements in the Future Homes Standards an Energy Statement (part of the Design and Access Statement) should be provided setting out the standards achieved.

d. Minor non-residential development of 999 sqm floorspace or less will be required to meet BREEAM 'Very Good' standard. Major non-residential development of 1,000 sqm floorspace or more will be required to meet BREEAM 'Excellent' standard. This should be demonstrated through the provision of a design stage report at the application submission stage and a post-construction assessment at the completion stage of the development both undertaken by a suitably accredited person;

e. Proposals for conversions and extensions to existing buildings are encouraged to incorporate energy efficiency measures and low carbon technologies which result in a reduction in carbon emissions, where this does not result in harm to the significance of a heritage asset and complies with other policies in the plan;

f. Development proposals are required to meet the requirements of the prevailing Heat Network Zoning Regulations, where applicable. If proposals are brought forward prior to the Heat Network Zoning Regulations coming in to force then the development, installation and connection to District or Communal Heat Networks is encouraged, where feasible. Heat networks can be developed on a range of scales and all new developments should consider their potential. Where a development proposal is close to a source of waste heat where there is a reasonable prospect of a heat network or an existing heat network it will need to demonstrate it has considered all opportunities to connect to it. Major residential developments of ~~300~~ 150 homes or more are required to be enabled for heat network connection unless demonstrated not to be feasible or financially viable to do so.

g. ~~All development proposals should~~ To minimise materials usage and waste and promote opportunities for a circular economy ~~by;~~ all development proposals will need to demonstrate through a Sustainability Statement (part of the Design and Access Statement) how they have implemented the following principles and requirements:

i. Reusing or adapting existing buildings as part of the development where possible;

ii. Reusing and recycling appropriate materials that arise through the development including non-contaminated soils and hardcore;

iii. Minimising construction waste, including designing out waste during the design stage;

iv. Prioritising the use of locally sources and/or sustainable materials and construction

techniques that have smaller carbon and ecological footprints;

v. Using locally distinctive, low maintenance and resilient materials;

vi. Designing the development to deliver longevity, adaptability, repairability and the ability to recycle products at the end of their lifetime; and

vii. Providing adequate facilities for recycling, food waste and home composting.

2. To adapt to climate change, all development proposals will need to demonstrate through a Sustainability Statement (part of the Design and Access Statement) how they have implemented the following principles and requirements:

a. The overall site layout, orientations and design of buildings has been undertaken in a manner that ensures resilience to future climate change impacts, such as avoiding areas at risk of future flooding, overheating, and provides for the comfort, health and wellbeing of occupiers over the lifetime of the development. These measures should be integral to the design and layout of the new development and consider the vulnerability of the building occupants;

b. Maximise green infrastructure to sequester carbon, provide urban cooling and deliver biodiversity net gains and ensure an appropriate landscaping scheme which incorporates permeable surfaces along with vegetation and planting which is adaptive to the effects of climate change and rising temperatures over the lifetime of the development;

c. Minimise water usage including through the use of sustainable water management solutions such as rainwater harvesting, greywater recycling, sustainable drainage systems, swales and green roofs where achievable.

d. All dwellings (including conversions, reversions and change of use) should achieve an estimated water consumption of no more than the prevailing optional technical standard (currently 110 litres/person/day) through the incorporation of water saving measures ~~where feasible~~.

Energy Efficient Design and Climate Change

4.3.1 Minimising the impact of and increasing resilience to the effects of climate change is an objective of the Local Plan in order to contribute towards the achievement of the national commitment of net zero carbon and greenhouse gas emissions (100% reduction relative to 1990 levels) by 2050. Mitigating climate change is about ensuring that the design and construction of new development (external fabric and structure) and the layout of internal and outdoor space minimises carbon emissions. In contrast, adaptation and increasing resilience to climate change is about ensuring that buildings can still function safely and effectively as the impacts of climate change, that we are already seeing, grow increasingly severe. Mitigation and resilience measures are complementary; they should be integrated into the design of new development.

4.3.2 In order to reduce whole-life carbon emissions the energy hierarchy classifies energy options, prioritizing and embedding more sustainable energy options such as minimising energy demand and maximizing energy efficiency right at the beginning of the design process. The least favourable option is located at the bottom of the hierarchy. This approach is also often referred to as the 'fabric first approach'. This must first be reduced by maximising performance of the components that make up the building fabric (i.e. consider the materials and design of the environment and then move down the energy hierarchy). Not only is the 'fabric first' approach the most sustainable and environmentally best approach, but it can also make an important contribution to addressing fuel poverty and improving social equity. All development proposals will be required to submit an Energy Statement as part of the Design and Access Statement to demonstrate that ~~the energy hierarchy has been followed and any specific policy requirements on energy efficiency that apply are met~~. Measures have been implemented to minimise carbon emissions and energy usage and maximise renewable and low carbon energy and storage.

4.3.3 The layout, orientation and design of buildings can reduce the need for energy consumption by maximising the potential to secure the benefits energy provides, e.g. heating, lighting and cooling, through alternative means. Design features such as south facing windows can allow for heat and light from the sun to be captured passively, whilst roof overhangs can provide natural shading, thereby reducing the need for cooling systems. There are also studies that show external shading such as shutters and canopies are more effective than internal shading. Where layout, orientation and design is not constrained or dictated by other factors, i.e. by the character of the surrounding area or the juxtaposition of adjacent buildings, applicants will be required to demonstrate how the design of the development has reduced the need for energy consumption.

4.3.4 A significant reduction in carbon emissions can be achieved by ensuring that buildings use energy more efficiently. By incorporating higher standards of insulation and using combined heat and power systems in buildings, occupiers can get more out of each unit of fuel that they use. Following the phasing out of the Code for Sustainable Homes as part of the government's wider review of housing standards

and the scrapping of 'net zero CO2 emissions' from 2016, energy efficiency is currently promoted by, and measured against, Part L of the Building Regulations. The regulations were most recently amended in 2021 to reflect improved standards for carbon emission; the government's position remains that energy efficiency standards will continue to be promoted through Building Regulations. ~~There are~~ Further ~~proposed~~ changes were made to the Building Regulations ~~anticipated~~ in 2026 with the introduction of the Future Homes Standard which developments proposals will be expected to be achieved subject to the transitional measures applied . ~~It is expected that the Future Homes Standard will deliver 75% CO2 emission reductions compared to the 2013 Building Regulations. Should the Future Homes Standard not be introduced prior to the Local Plan Review being adopted then proposals will be expected to achieve, as a minimum, the 75% CO2 emissions reduction compared to the 2013 building regulations equivalent to the proposed Future Homes Standard.~~ Should a proposal seek to achieve higher efficiency standards than the Future Homes Standard then an assessment should be provided within an Energy Statement setting out the energy efficiency standards to be achieved.

4.3.5 Major non-residential development proposals of 1,000 square metres or more will be expected to achieve a minimum of BREEAM certified 'Excellent' standard. Minor non-residential development proposals of 999 square metres or less will be expected to achieve BREEAM certified 'Very Good' standard. Applicants will be expected to provide a design stage report as part of their application and will be required by planning condition to provide a post-construction assessment once the development has been delivered. This should be undertaken by an accredited assessor. BREEAM New Construction Standard is the UK version of BRE's international sustainable building standard for non-domestic buildings. This includes commercial, office, retail, education, healthcare, public buildings and short and long stay residential institutional buildings such as hotels, care homes and sheltered accommodation etc. It can include part new-build and part refurbishment projects.

4.3.6 A key part of achieving this is ensuring the proposal has been designed to include the maximum amount of photovoltaic (PV) solar panels on the roof or it incorporates other suitable forms of renewable energy generating schemes and technologies that are appropriate to the location and setting of the proposal.

4.3.7 When considering proposals affecting existing buildings which require permission such as conversions or extensions, significant weight will be given to improvements proposed to the fabric and energy efficiency and low carbon heating improvements (including through installation of heat pumps and solar panels) where they do not conflict with the policies in the Local Plan including Policy ENV1. Applicants seeking to make adaptations to Historic Buildings are advised to consult the Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency (February 2026) or its successor.

Embodied Carbon

4.4.1 As the carbon component of the national electricity grid reduces, embodied carbon and whole life carbon will become a greater component of a building's whole life emissions. The Council wants to give priority to collecting data on embodied carbon to ensure developers prioritise consideration of it in the design process and account for emissions from the Built Environment to align with the Council's climate emergency and national targets.

4.4.2 Developers are therefore expected to consider the energy and resource use associated with the raw material extraction, manufacture and transport of building materials and construction, and emissions associated with the maintenance, repair and replacement as well as dismantling, demolition and eventual material disposal of the building. Particular consideration should be given to the use of low embodied carbon, locally sourced and manufactured materials. Where buildings are being demolished as part of new development, an explanation should be provided as to why their reuse would not be possible or practical.

4.4.3 Developments will need to provide information about what measures they are taking to reduce embodied carbon as part of their Energy Statement. In addition, the largest developments will be expected to calculate their embodied carbon using the latest version of the RICS Whole Life Carbon Assessment for the Built Environment ~~guidance or another nationally recognised~~ methodology. Further details about how this should be provided will be set out in future guidance.

Heat Networks

4.5.1 Heat networks are essential for meeting climate targets, with the Committee on Climate Change suggesting that 20% of heating will need to come from district heating by 2050. The government's Warm Homes Plan (2026) sets a target to more than double the amount of heat demand met via heat networks in England to 7% by 2035 with them expected to provide 20% of all heat by 2050. It also recognises that heat networks are an essential part of decarbonizing heat, enhancing energy security, tackling fuel poverty and achieving net zero by 2050.

4.5.2 Heat Network Zoning regulations are expected to be laid before parliament ~~in Spring 2026~~ to implement the Heat Network Zoning. Proposals will be expected to comply with these regulations once enacted. Should these regulations not be enacted prior to the adoption of the Local Plan then proposals should, where feasible, seek to develop and install District or Communal Heat Networks or connect to existing networks. Heat networks can be developed on a range of scales from Communal Heat Networks serving a single building to District Heating Networks comprising a standalone energy centre serving multiple buildings. The Council will particularly promote the development of district heat networks on larger strategic sites where opportunities exist due to high heat density or an increase in heat density brought about by new development.

Minimising Waste & Material Usage

4.6.1 Development proposals should demonstrate, within a Sustainability Statement (part of the Design & Access Statement), the measures they will employ through the design process and construction stage to minimise waste, material use and maximise the opportunities for recycling materials. The circular economy principles

seek to ensure a sustainable future that seeks to minimise use and reuse of finite materials and resources.

4.6.2 Proposals should ensure adequate storage and space is provided for recycling, food waste and home composting to encourage residents to use these methods of waste disposal.

Adaptation Measures

4.7.1 Developments should be designed to support the comfort, health and wellbeing of future occupants, taking into account the way that the climate will change over the lifetime of the development. Regarding buildings, this should include measures to reduce vulnerability to overheating (including consideration of the internal layout, the orientation of glazed areas and the potential use of green roofs with sufficient substrate depth to maximise cooling). Across the site, consideration should be given to issues such as providing shading through tree planting and designs that enable airflow through the development. It is recognised that these adaptation measures can also have wider benefits, such as supporting green infrastructure, biodiversity and carbon sequestration.

4.7.2 To assist in mitigating the nutrient impact of residential development proposals on the Teesmouth and Cleveland Coast Special Protection Area, development proposals, where feasible, are expected to achieve the prevailing optional technical standards for water efficiency.

Flood Risk and Water Management

Policy DC 3

Flood Risk & Water Management (Strategic Policy)

New development will be focused in areas of low flood risk (Flood Zone 1) as identified by the Borough's Strategic Flood Risk Assessment (20~~19~~26) or most recent assessment. In considering development on sites in higher flood risk areas, the Sequential and Exception Tests must be passed and the sequential approach applied on site. Site specific flood risk assessments will be required in accordance with national policy.

All development proposals will be expected to be designed to mitigate and adapt to climate change. They will be designed to ensure:

a. They will be safe over the lifetime of the development, including access and egress to individual buildings;

b. Flood risk is not increased elsewhere and will, where possible, reduce flood risk overall;

c. Opportunities are taken to mitigate flooding elsewhere;

d. Full separation of foul and surface water flows;

e. Sustainable Drainage Systems (SuDS) are prioritised; and

f. SuDS have regard to the Tees Valley Sustainable Drainage Systems (SuDs) Guidance Design Guide, ~~and~~ the National Standards for Sustainable Drainage

Systems and the Environment Agency approach to Groundwater protection document.

g. Opportunities for rainwater harvesting are utilised.

Where required, the incorporation of SuDS must be integral to the design process and integrated with green infrastructure. Priority should be given to natural drainage features which are designed to encourage wildlife and create habitat enhancement within the site and act a functional habitats which link to create green and blue corridors. Where SuDS are provided arrangements must be made for their whole life management and maintenance.

Surface water run-off must be discharged to one or more of the following, listed in order of priority:

1. Collected for non-potable use (rainwater harvesting)

2. Discharged into the ground (infiltration); or where not reasonably practicable;

3. Discharged to a surface water body; or where not reasonably practicable;

4. Discharged to a surface water sewer, highway drain or another drainage system; or where not reasonably practicable;

5. Discharged to a combined sewer.

To utilise a lesser priority final destination appropriate evidence will need to be provided demonstrating all higher priority final destinations have been utilised to the maximum extent practicable. Disposal to combined sewers should be the last resort once all other methods have been investigated.

To ensure that growth can be accommodated sustainably by the sewerage infrastructure, this 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.

For development proposals on previously developed land, the peak runoff rate from the development to any drain, sewer or surface water body for the 1-in-1 year rainfall event and the 1-in-100 year rainfall event should be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event. For developments on greenfield land, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1-in-1 year rainfall event and the 1-in-100-year rainfall event should never exceed the peak greenfield runoff rate for the same event.
Developers will be required to submit drainage details for consideration by the Council, in consultation with the Environment Agency and Northumbrian Water Ltd, to ensure adequate management of foul and surface water flows. Major developments (development of 10 or more dwellings and other developments with a floor space of 1,000m^{2}or more) will be required to incorporate SuDS unless it can be demonstrated that it would be inappropriate.

The drainage system must be designed and constructed so surface water discharged does not adversely impact the water quality of receiving water bodies, both during construction and when operational. New development should seek to improve water quality where possible, as well as maintaining and enhancing the biodiversity and habitat of watercourses.

Within critical drainage areas or other areas identified as having particular flood risk issues the Council may:

h. Support reduced runoff rates.

i. Seek contributions, where appropriate, towards off-site enhancements directly related to flow paths from the development, to provide increased flood risk benefits to the site and surrounding areas.

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.

4.8.1 The NPPF outlines that the planning system plays a key role in the mitigation and adaptation to climate change, including the management of water and flood risk. It goes on to state that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk (whether existing or future), but where development is necessary, making it safe for its lifetime without increasing flood risk elsewhere. Reducing and mitigating flood risk is an important issue for planning particularly as the effects of climate change are being realised. When addressing flood risk it is important to consider all sources of flooding which include fluvial, surface water, sewer and groundwater flooding.

4.8.2 As required by national policy, Local Plans should apply a sequential approach to the location of development to avoid where possible flood risk to people and property. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. Any proposal that involves development within an area of risk would require the exception test to be applied and passed if appropriate. The proposal would have to demonstrate wider sustainability benefits which outweigh the flood risk and also demonstrate that the development will be safe for its lifetime, accounting for the vulnerability of its users, without increasing flood risk elsewhere and where possible reducing flood risk overall.

4.8.3 The Local Plan has been informed by the Darlington Strategic Flood Risk Assessment (20~~19~~26) which is the basis for the sequential test and identifies areas at risk of flooding from all sources, now and in the future, taking into account the impacts of climate change. This assessment has informed the allocation of sites in the Local Plan and should be taken into account when considering future development proposals, along with catchment flood management plans, surface water management plans and related flood defence plans and strategies.

4.8.4 Policy DC 3 seeks to direct new development to areas at lowest risk of flooding in accordance with the sequential test. If it is not possible to direct development to low-risk areas, then the exception test must be applied as outlined.

4.8.5 Flooding from surface water occurs during extreme rainfall, storms and when heavy snow melts, when the ground or rivers cannot absorb all the surface water or when rainwater rapidly flows into the public sewerage and drainage system, causing overloading and back-up of water to the surface. It is more of a risk in the older built-up parts of the Borough with traditional drainage, such as the Town Centre Fringe, and low-lying parts of the Borough.

4.8.6 Climate change and the significant amount of new development envisaged in

the Local Plan could increase the risk, if the increase in impermeable surfaces is not adequately mitigated.

4.8.7 Sustainable Drainage Systems (SuDS) are now the preferred approach to managing surface water runoff from hard surfaces. The primary purpose of SuDS is to control surface water runoff close to where it falls and mimic the natural drainage of the site prior to development. They use a number of techniques generally based on natural drainage features to collect, treat, store and then release storm water slowly to the environment. There are many different SuDS features available to suit the constraints of a site. SuDS schemes provide many benefits beyond just reducing flood risk, such as assisting in improving water quality, creating new habitats for wildlife and providing a valuable amenity asset. Further information and technical guidance can be found in the Tees Valley Sustainable Drainage Systems (SuDs) Guidance Design Guide and Local Standards (2019) and national standards such as the CIRIA SuDs Manual (C753), CIRIA – Using SuDs to reduce nitrogen in surface water runoff (C815) and the latest Design and Construction Guidance/Code by Water UK.

4.8.8 SuDS should be designed to act as functional habitats, to link habitats and create green/blue corridors, which will increase biodiversity. The design of SuDs should, where possible, prioritise natural drainage features such as retention basins, swales and rain gardens, offering wildlife habitat year-round, along with appropriate planting, which should where possible include plants of local provenance that are hardy and suited to the local environment and climate. The incorporation of wetlands surrounding SuDs features will offer many benefits including carbon capture, nutrient run off reduction and increasing habitats for wildlife including protected species such as great crested newts.

4.8.9 When SuDs are incorporated the management measures should, where applicable, align with the Habitat Management and Monitoring Plan for the Biodiversity Net Gain requirements. Natural SuDs features will create breeding habitats for protected species such as GCN and for other wildlife including dragonflies and other invertebrates, which will increase the food availability for birds and bats.

4.8.10 The Council as the Lead Local Flood Authority is responsible for preparing a local flood risk management strategy and maintaining a register of flood risk assets. The Local Flood Risk Management Strategy was published in May 2016. The Strategy sets out how the Council will manage flood risk from surface water runoff, groundwater and ordinary watercourses for which the Borough Council has a responsibility as Lead Local Flood Authority, and other types of flooding where local agents can play a supporting role to lead agencies. The strategy identifies opportunities to reduce and mitigate flood risk; information which can be utilised in the development management process.

4.8.11 Part 2 of the 2010 Strategic Flood Risk Assessment identified the Town Centre Fringe (area to the east of the river Skerne) as a Critical Drainage Area (CDA). CDAs are those areas identified from historical flood events and/or modelled data as having a significant risk from surface water flooding or subject to potential large changes in runoff due to development. In these areas and other areas with flood risk issues it may be beneficial to restrict runoff rates to a level to provide flood risk benefits. The Council may also seek contributions towards off-site enhancements directly related to flow paths from the development, to provide increased flood risk benefits to the site and surrounding areas.

4.8.12 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, Magnesian Limestone, a highly sensitive environmental receptor, with a number of source protection zones and an important source of water for a large number of public, private and industrial supplies. Pollutants can easily permeate soils 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. In taking a precautionary approach to groundwater protection, the Environment Agency have advised that they may object to SUDs proposals which seek to include direct pathways to groundwater.

4.8.13 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.

4.8.14 Prior to submitting a planning application, applicants are encouraged to seek formal pre-planning advice from Northumbrian Water Limited to inform their drainage strategy.

5. HEALTHY COMMUNITIES

Health and Wellbeing

5.1.1 Helping to reduce health inequalities is a key local policy objective and providing accessible local healthcare facilities can improve the quality of life and wellbeing of residents in the Borough. Darlington's Council Plan[9] recognises the fundamental link between health, wellbeing and the economy. It is shaped by the building blocks of good health with a focus on a good job, home and social connections. The plan has six priorities: economy, homes, living well, children and young people, communities, and the local environment. The Local Plan has a significant role in ensuring these priorities are delivered.

5.1.2 Darlington has a network of primary and community care facilities, such as GP surgeries and dentists, as well as mental health and acute hospital facilities at West Park and Darlington Memorial Hospital respectively; both of these latter two are expected to continue to offer accessible healthcare from their existing sites. There is also a private hospital at Morton Park, and a private mental health facility at the Teesside International Airport site.

5.1.3 Many factors influence our health, including the lifestyles we lead, the environment we live in and the opportunities we have to exercise and access health facilities. A wider sense of wellbeing is influenced by a variety of factors such as opportunities for work and recreation, attractive environments, personal relationships and feelings of safety and community.

5.1.4 The link between planning and health has been set out in national policy. Health and wellbeing is a cross-cutting theme in this plan; policies on inclusive design, green space, transport and housing in other chapters will play a key role in reducing health inequalities and encouraging healthy lifestyle choices.

5.1.5 Healthy New Towns was an NHS England sponsored programme about building healthy communities. Darlington was one of 10 sites selected nationally to take part in this programme. Darlington's Healthy New Towns project was focused on an area including Red Hall, Burdon Hill and Lingfield Point - collectively known as the Eastern Growth Zone. It included some new development and some refurbishment of existing homes.

5.1.6 The Eastern Growth Zone in Darlington was chosen due to the economic and housing development opportunities the area presented, along with some significant challenges in terms of health inequalities compared to the rest of Darlington. These include:

- High premature mortality rates;

[9] Darlington Council Plan 2024 -2027, DBC

- Higher worklessness than other areas of Darlington;
- Significantly high emergency hospital admissions;
- A significantly high number of residents with a life-limiting condition.

5.1.7 There are a number of cross-cutting aims derived from the Healthy New Towns project that would be supported through development during the plan period including:

- Building of homes that assist citizens to stay informed, live healthily and maintain independence;

- Use the built environment and public realm as a health improvement tool that:
  - encourages healthier lifestyle choices and exercise;
  - aids connections within and between communities, social cohesion and sense of community;
  - harnesses natural benefits of green and blue space;
  - improves access to employment opportunities and employability.

Policy HC 1

Health and Wellbeing (Strategic Policy)

Development that supports improvements to health and wellbeing in Darlington will be supported. In order to achieve this the council will:

a. Work with the NHS to reduce health inequalities in the areas with poorest health;

b. Protect existing facilities, where possible, and support the provision of new or improved health facilities in sustainable locations;

c. Support the integration of community facilities and services, i.e. health, education, cultural and leisure in multi-purpose buildings;

d. Ensure that new developments:

   i. are age friendly, inclusive, safe and attractive, and easily accessible on foot or by bicycle. Where appropriate this should integrate dementia friendly design principles;

   ii. have a strong sense of place which encourages social interaction;

   iii. are designed to promote active travel and other physical activity through the arrangement of buildings and uses, access to open space and landscaping;

   iv. through the arrangement of buildings and uses, promote access to open space and landscaping, and the provision of facilities to support walking.

e. Promote improvements and enhance accessibility to the Borough's green spaces and green infrastructure corridors;

f. Ensure 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 and reduce their pollution so as not to 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;

g. Require, in the case of development of 150 or more homes and all other non-residential 'major' development, the submission of a Health Impact Assessment as part of the application to explain how health considerations have informed the design. Assessments should be proportionate to the scale of development proposed and undertaken in line with current government guidance.[10]

Comprehensive planning of land for development at strategic development sites of Skerningham, Burtree ~~Garden Village~~ and Coniscliffe Park will be required to include for the possibility of new primary care as appropriate (see Policies H 10 and H 11).

5.1.8 Applicants will be expected to 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 utlilise the design principles set out within Sport England's 'Active Design' guide[11] when preparing a development scheme in order to promote active, healthy and stronger communities.

5.1.9 Population growth and an ageing population are placing pressure on primary healthcare facilities in Darlington. Population projections indicate an overall population increase of around 12,000 people between 2016 and 2036[12], which is around 3000 extra patients in every five-year period. However, the over 65 population, which places a higher demand on services, is projected to increase from 21,000 in 2016 to 31,000 by 2026.

5.1.10 Types and levels of health issues vary considerably across Darlington and spatial planning has a role in meeting health needs throughout the Borough. The reasons for these variations are complex and are likely to include both disparities in health need and demand for health services. Health inequalities in Darlington are apparent with the most deprived areas tending to experience the poorest health.

5.1.11 Darlington Borough Council and NHS North East and North Cumbria Integrated Care Board (ICB) work together to identify the key priorities of the borough's residents through Joint Strategic Needs Assessment (JSNA)[13]. The JSNA data highlights the health needs and current trends in the Borough in order to further understand and address the existing inequalities. The focus of future land and facility requirements will be on ensuring there is adequate primary care provision in the Borough to meet local needs. The council will support the provision of additional health facilities and will work with the ICB and other service providers to ensure the Borough has a necessary supply and distribution of accessible premises to meet health care needs. Further information on health infrastructure

[10] Public Health England, Health Impact Assessment in spatial planning , October 2020 (or subsequent replacement)

[11] Active Design – Creating active environments through planning and design, Sport England, May 2023

[12] Darlington Strategic Housing Market Assessment 2017.

[13] Joint Strategic Needs Assessment 2025, Darlington Borough Council

will be set out in the Infrastructure Delivery Plan.

5.1.12 During the plan period a significant proportion of new housing is proposed in north, west and eastern fringes of Darlington. This development would generate additional needs for primary health care. Some GP practices near these areas are already experiencing pressure on patient lists. Most general practices in Darlington encompass the entire township within their practice boundary and therefore patient choice will play a part in determining which practices have increases in patient numbers. Any additional capacity which is created in general practice will need to reflect patterns of patient choice.

5.1.13 Strategic sites include a requirement for land of appropriate configuration to accommodate community infrastructure to be reserved in a masterplan. These requirements will facilitate the delivery of additional health care provision, in accessible locations within housing growth areas, if funding is made available within the Plan period.

Safeguarding Amenity

5.2.1 A core function of planning is to ensure a good standard of amenity for all existing and future occupants of all types of land and buildings, particularly residential properties. Without appropriate controls, new development could result in unacceptable living environments for its occupants, reduce the quality of life for the occupants of neighbouring buildings, and result in poor quality neighbourhoods overall. It is also an overarching aim of the Local Plan to improve the quality of life for those living in the Borough (Section 2 - Visions, Aims and Objectives), and to ensure that employment sites remain attractive, by not being unduly constrained by neighbouring uses.

Policy HC 2

Safeguarding Amenity

New development should be sited, designed and laid out to protect the amenity of existing users of neighbouring land and buildings and the amenity of the intended users of the new development. New development will be supported where it is suitably located and is acceptable in terms of:

Form of built development

a. Privacy and overlooking;

b. Access to sunlight and daylight;

c. Visual dominance and overbearing effects of a development;

d. The relationship of proposed and existing habitable rooms, windows and outdoor living spaces. Guidance on separation distances between residential developments is provided in the adopted Design of New Development SPD.

Use of land and buildings, including traffic movements and hours of operation

e. Noise and disturbance;

f. Artificial lighting;

g. Vibration;

h. Emissions from odour, fumes, smoke, dust, etc; and

i. Commercial waste.

Where an otherwise acceptable development could change its character to a use that would have a greater impact on amenity without needing planning permission, conditions will be applied to control such changes.

Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant ('agent of change') will need to provide suitable mitigation before the development has been completed.

5.2.2 The Local Plan aims to deliver significant new development, mostly within the existing urban area of Darlington. The mix, density and concentration of uses needs to be planned well at the detailed level to avoid conflicts between uses, where segregation is not provided by land allocations.

5.2.3 The aspects of amenity taken into consideration through the planning process are:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Artificial lighting;
- Vibration;
- Emissions of odour, fumes, smoke, dust etc., and
- Commercial waste

5.2.4 Conflicts between neighbouring developments can often 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. roads and railways, bin stores and noisy equipment, plant and operations, and which are most sensitive to their effects, e.g. 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, 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.

5.2.5 The visual impact and sustainability of any mitigation measures, for example, acoustic barriers should be considered by developers and applicants.

5.2.6 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, as should details of how required internal and external noise levels will be achieved.

5.2.7 This policy applies equally to amenity levels within new and existing residential developments. For instance, proposals should avoid locating living rooms, bathrooms and kitchens next to, above, or below neighbouring bedrooms of attached properties or any proposed.

5.2.8 Artificial lighting can significantly impact on the environment and people. Artificial lighting is important for security and safety and has other important uses such as lighting key buildings. However, poorly designed or badly directed lighting can cause loss of sleep, illness, discomfort and loss of privacy and obscure the night sky. Lighting can also have a significant and detrimental impact on wildlife through affecting the annual and diurnal rhythms of plants and animals and act as a significant barrier to some, including protected nocturnal animal species such as bats.

5.2.9 Artificial lighting can become a significant issue where it is excessive, poorly designed, badly installed or poorly maintained. Unnecessary light also causes excessive carbon emissions, contributing to air pollution and poor air quality. All forms of exterior lighting can result in light pollution. Light pollution can be defined as artificial light which shines outside the areas it is intended to illuminate, including light which is directed into the night sky, creating ‘skyglow’.

5.2.10 This policy will safeguard against excessive, inefficient and irresponsibly situated lighting, limiting the impact from light pollution on local amenity, intrinsically dark landscapes, and nature conservation. Development proposals should provide a lighting plan which sets out a sensitive lighting design scheme including for bats/nocturnal wildlife (Priority habitats & species). The scheme shall identify those features on site that are particularly sensitive for bats/nocturnal wildlife and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory. Reference should be made to relevant guidance including the ILP Bats and Artificial Lighting at Night Guidance Note. Dark corridors are required within relevant sites to ensure that light sensitive nocturnal wildlife and bats such as brown long-eared and *Myotis* species can use the area with low or no disturbance from additional lighting. Dark corridors should be mapped out and included within the lighting plan.

5.2.11 Other policies in this document deal specifically with uses which often have particular amenity impacts including; new employment uses (Policy E 2), new housing (Policy H 2), rural employment (Policy E 4) and the Town Centre (Policy TC 1) and these should be read in conjunction with this policy where they apply.

5.2.12 As national planning policy states it is important to ensure that new development can be integrated effectively with existing businesses and community facilities such as places of worship, pubs, music venues and sports clubs. Existing established businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were already in existence. In circumstances where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity the applicant or ‘agent of change’ will be required to provide suitable mitigation before the development is completed.

5.2.13 Certain development is permitted under national ‘permitted development’ rights' with the exception of prior approval. In such circumstances, 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.

5.2.14 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 Government and other appropriate guidance on the assessment of matters which are material planning considerations.

Hot Food Takeaways

Policy HC 3

Hot Food Takeaways

Hot food takeaways and fast food outlets will be permitted:

a) Where they are not within walking distance of schools (defined as 400m), unless within the designated town centre (Policy TC1) or district/local centre boundaries (Policy TC4); and

b) Where they are not located within Northgate, Stephenson, Bank Top & Lascelles or Park East Wards which already have significant concentrations of such uses and have evidence of adverse local health impact; and

c) Where they are not located within the Strategic Site Allocations identified in Policies H10 and H11; and

d) Where they can satisfy other planning requirements in relation to design, amenity and highway safety.

5.3.1 Paragraph 97 of the NPPF outlines that Local Planning Authorities should refuse applications for hot food takeaways and fast-food outlets that are within walking distance of schools or places children and young people congregate (unless within the town centre) and where evidence is provided on local health, pollution or anti-social behaviour.

5.3.2 The Darlington Joint Local Health and Wellbeing Strategy adopted in 2025, includes creating 'Healthy Places as a key theme with actions around tackling commercial determinants of health, and use the planning system to restrict new hot food takeaways. The theme 'Best Start in Life' has an ambition to increase the numbers of children who are a healthy weight. The strategies Vision specifies that the local plan must be focused on reducing health inequalities.

The Council Plan makes a commitment to work with communities to reduce the burden of the cost of living and focus on food insecurity, and through planning will ensure that development is sustainable and will positively impact local communities.

5.3.3 In the UK, 27% of adults and 19% of children eat meals out of the home at least once a week, and takeaway food consumption peaks in young adults aged 19-29 years. Takeaway foods tend to contain high levels of fat, saturated fats, sugar, and salt, and lower levels of micronutrients, and therefore regular consumption of takeaway food over time has been linked to weight gain[14].

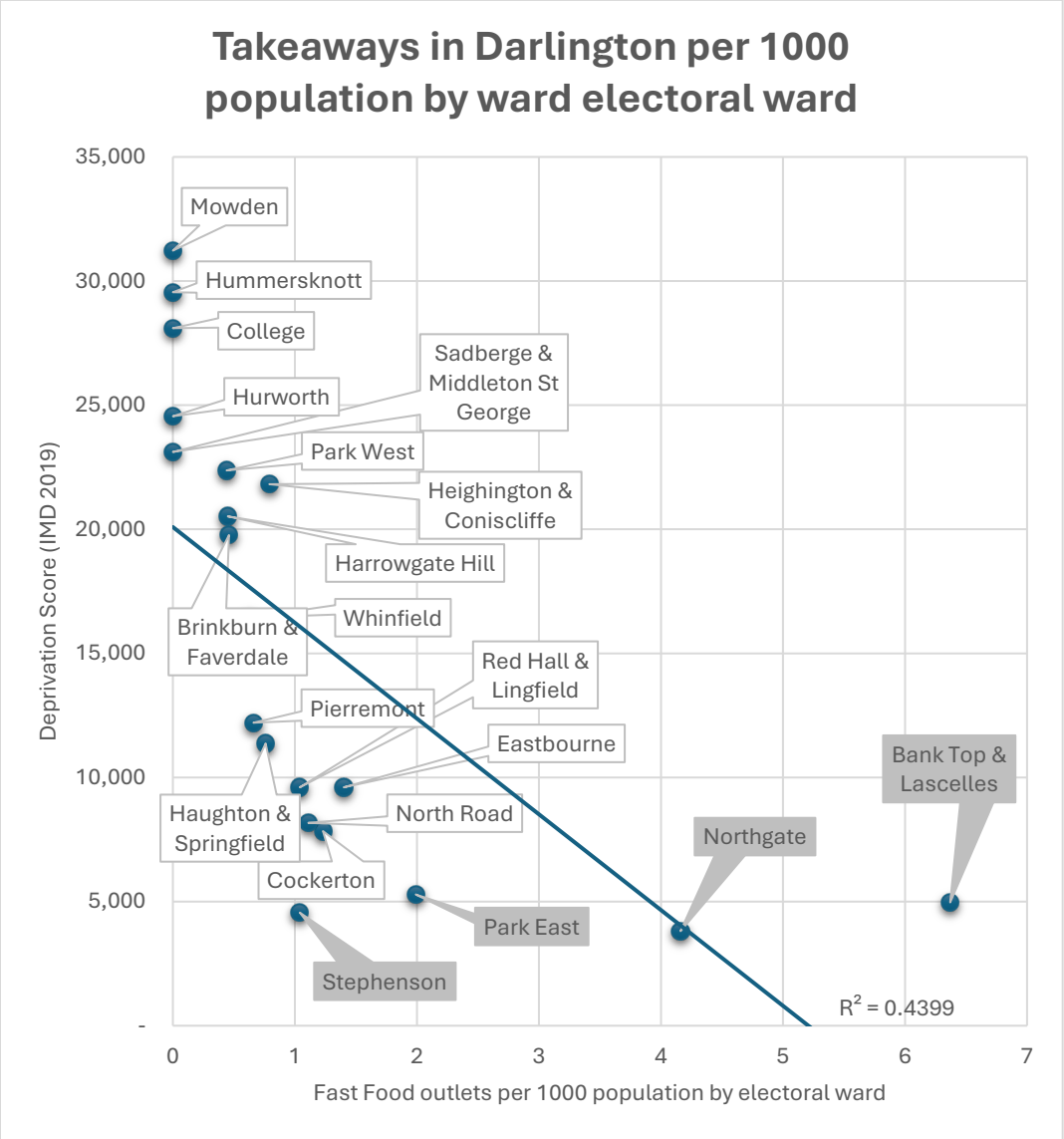
5.3.4 This impact is worsened by high exposure to hot food takeaways. Adults with increased exposure to hot food takeaways have increased takeaway consumption, and as such have a higher average body weight.

5.3.5 More deprived areas have higher concentrations of fast-food outlets, with the poorest areas seeing 5 times more takeaways than the most affluent areas[15]. Trends in Darlington Borough are consistent with this. The following graph demonstrates that more deprived areas in Darlington tend to have a higher ratio of takeaways per 1000 population.

[14] "Using the Planning system to promote healthy weight environments" Public Health England (2020)

[15] Obesity and the environment : Density of fast food outlets at 31/12/2017, Public Health England

Graph showing Takeaways in Darlington



Gambling Premises

Policy HC 4

Gambling Premises

To ensure that shopping areas remain diverse and balanced, and to help address concentrations of deprivation, crime and ill health, the council will seek to manage the concentration of gambling premises.

Planning permission for gambling premises may be granted within the Town and Local/District Centres where it can be demonstrated that the proposal is not located within a high-risk zone for gambling related harm or a Cumulative Impact Area.

Planning Permission for gambling premises may be granted where:

a) it will not impact adversely on the amenity, character and function of an area; and

b) it will add to the vitality of the existing shopping parade; and

c) they would not be within 800 metres of a school; and

d) it will not result in negative cumulative impacts. Cumulative impacts will be considered as follows:

1) Linear concentrations:

i. None of the specified uses in the policy are adjacent to each other; and

ii. There are at least two units in other uses between gambling premises; or

2) Area concentrations:

iii. There are no more than three (in total) gambling premises within 400m of each other.

5.4.1 The Government introduced additional planning controls in relation to betting offices, removing them from Class D2 use to a 'sui generis' use. This means that betting shops have been taken out of the planning 'use' classes and will need to receive planning approval. This has enabled planning authorities to exercise stricter controls over these uses.

5.4.2 Whilst there is a trend towards gambling online and at home, proposals could nevertheless be received for new gambling premises or extensions to approved hours. Facilities for gambling, including betting shops and casinos require a license from the council to operate. This is separate from the planning regime. To ensure that shopping areas remain diverse and balanced, the council is seeking to limit the amount and concentration of premises used for gambling and betting in areas of high concentration. This will also help the council address strategic and

borough wide objectives in relation to health, addressing deprivation and regeneration.

5.4.3 The industry-funded charity GambleAware uses national survey data applied to local demographic profiles to estimate the rates of problem gambling at local authority level. They estimate that 2.5% of the Darlington borough population suffers from problem gambling, and 4.2% engage in moderate-risk gambling [16] GambleAware also estimates that the cost of gambling related harm in Darlington is currently £2,009,777 annually [16].

5.4.4 Mapping of gambling premises in Darlington, including scratchcard outlets and lottery terminals, has also recently been undertaken by the ADPH North East Gambling Harms Programme. This found 248 premises with active licences to provide land-based gambling in Darlington Borough. The vast majority (61/67) of the gaming licences are held by public houses or bars, whilst convenience stores are the most common location for both scratchcard and lottery terminals (42 out of 80 scratchcard and 41 out of 84 lottery terminals respectively). When machine permits, lottery terminals and scratchcards are excluded, there at 15.1 gambling premises per 100,000 people in Darlington, higher than the national average of 12.9. This places Darlington in the top third of districts and unitary authorities in England for land-based gambling premises per capita.

5.4.5 As is the case nationally, premises cluster in socioeconomically deprived areas, with 66 premises in the most deprived Darlington ward Park East, compared to 5 in the least deprived, Mowden. This pattern persists when scratchcards and lottery terminals are excluded, with 37 premises in Park East, and 3 in Mowden.

5.4.6 The Healthy Lifestyles Survey collects data from school-aged children and young people in Darlington annually. In 2024, questions on gambling behaviour were included for the first time. Response rates (whether children chose to answer or skip the questions about gambling) were excellent for the 3197 secondary school children surveyed, but poor for the 1482 primary school children surveyed.

5.4.7 Of the activities asked about, arcade games had the highest participation, with 73% of primary and 55% of secondary school aged children reporting playing arcade games for fun. Notably, 18% of secondary school children reported buying loot boxes, 15% placing bets with friends, and 9% reported gambling online. Worryingly, 20% of secondary school students and 36% of the primary school children surveyed indicated that they found it difficult to stop gambling.

Thirty one percent of primary school children and 18% of secondary school aged children who responded believed that most or nearly all of their peers had taken part in a gambling activity in the last 7days. This demonstrates the extent to which gambling participation is normalised amongst children in Darlington.

[16] GambleAware: Gambling Harm Data Profile, Darlington, August 2025

Policy HC 5

Skills and Training

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 secure appropriate commitments and targets for employment skills and training, including apprenticeships appropriate to the development proposed.

5.5.1 The number of residents (aged 16-64) with no qualifications in the Borough is 6.5%[17] which is similar to Great Britain with 6.8%. The overall number of Borough residents unemployed (aged 16-64) is 3.9%[18] again similar to Great Britain (4.2%). There has, however, been a significant issue in underemployment, i.e. people in low-paid insecure employment, identified in the Borough along with a high, spatially concentrated increase in 16–24 year olds not in employment, education or training in the least affluent wards[19].

5.5.2 It is therefore important to ensure that current and future residents within the Borough have access to the employment and business opportunities that will emerge over the life of this Local Plan and that these opportunities are available across the range of employment opportunities that are forecast to emerge. This includes encouraging relationships between businesses operating within the Local Plan area and local schools and colleges, to raise aspirations and help prepare young people to have the right information, motivation and aptitude to compete with the best across the region to be part of the future workforce.

[17] Office for National Statistics – Annual Population Survey (2024)

[18] Office for National Statistics – Annual Population Survey (2025)

[19] Levelling Up Darlington Plan

6. HOUSING

6.0.1 The National Planning Policy Framework (NPPF) requires Local Planning Authorities to support the Government's objective of significantly boosting the supply of housing. It is important that a sufficient amount and variety of land can come forward where it is needed. Strategic policies should set out the minimum number of homes required. The size, type, and tenure of housing needed for different groups in the community should also be assessed and reflected in the planning policies. Many factors have an impact on housing demand including population growth, decreasing household size, an ageing population, migration, economic growth and residents being unable to afford homes in the area. These issues, in combination, result in a significant need for new homes of an appropriate mix and type.

6.0.2 The NPPF also requires Local Planning Authorities to identify and update annually a five-year supply of deliverable housing sites against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of 5% or 20% where there has been significant under delivery of housing over the last three years.

6.0.3 It is important to note that the need to deliver a mix of new homes across the Borough is not considered in isolation and the Local Plan also considers and plans for issues such as the provision of new community facilities and infrastructure. It is a combination of these elements which are required to deliver sustainable communities and these issues are addressed in other relevant chapters and within the supporting infrastructure plan. ~~which will be published to accompany the Proposed Submission Local Plan.~~

6.0.4 This chapter sets out the housing requirement for the Borough, housing allocations and policies on the mix of housing, custom and self-build, affordable housing, exceptions, residential development in rural areas, housing intensification, HMOs and accommodating travelling groups.

Policy H 1

Housing Requirement (Strategic Policy)

Housing will be delivered to meet a minimum requirement of ~~446~~490 net additional dwellings per annum over the plan period from 2025 to 2042. This results in a total net minimum requirement of ~~7,582~~8,330 dwellings.
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.

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, housing sites located beyond development limits that would make both a positive contribution to the five year supply of housing land and be well related to the built form of the main urban area or service villages (as defined in Policy SD 2) will be supported. Such proposals should be consistent with relevant national and Local Plan policies.

The NPPF states that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The table below outlines the minimum housing requirement for the neighbourhood areas in the Borough, following the above approach.

Table 6.1 Neighbourhood Area Housing Requirements

Low Coniscliffe & Merrybent	~~1405~~1402
Blackwell	0
Hurworth	~~364~~297
Middleton St George	~~742~~682
Sadberge	~~49~~46

6.1.1 The amount of housing to be planned for is one of the most important issues within the Local Plan. The NPPF sets out to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning practice guidance. Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. No neighbouring authorities have requested that Darlington Borough Council accommodates any unmet housing needs from their areas.

6.1.2 A new standard method was introduced by the Government in December 2024 which included updates to the NPPF and planning practice guidance. In the past the method was based on household growth, whereas the new method uses a formula that incorporates a baseline of housing stock. It uses 0.8% of the existing housing stock for the area which is then adjusted upwards to reflect local affordability pressures. The affordability data used is the median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level. The mean average affordability ratio over the five most recent years for which data is available is used.

6.1.3 The data which is utilised in the method varies over time as new data becomes available. As of ~~January~~August 2026 the calculation generates a minimum annual local housing need figure for Darlington of ~~446~~453 dwellings. The NPPF and practice guidance explains that the housing requirement in a Local Plan may be higher than the identified housing need, for example to reflect economic growth aspirations. Darlington is an ambitious authority with regards to economic growth and the area has performed relatively well in recent years attracting businesses and government departments~~, however when looking at past delivery rates it is considered appropriate and realistic to utilise the 446 figure as the housing requirement. It is considered that this will not constrain development as a substantial land supply buffer has been factored into the development plan~~. As such an uplift has been applied to the local housing need figure to take account of potential jobs growth over the plan period which is estimated at approximately 350 jobs per annum. This is evidenced in the Darlington Future Employment Needs Report September 2026. The uplift factors in the number of new homes required to support such employment growth and is explained in the Local Housing Needs Assessment 2026.

6.1.4 With regards to the neighbourhood area housing requirements, the Council has followed policy and guidance in the NPPF and NPPG in setting the figures. The requirements are based on the number of dwellings that are expected to be built on housing allocations and commitments in that neighbourhood area between 2025 and 2042. This approach follows the guidance in reflecting the plan's spatial strategy and supporting evidence base (e.g. HELAA and SA). The neighbourhood planning body does not have to make specific provision for housing or seek to allocate sites to accommodate the requirement. The requirements are met through the allocations in policy H 2 and the housing commitments set out in table 6.7. If monitoring indicated that the committed and allocated sites were not delivering the number of homes set out in table 6.1, there should not be an automatic expectation that development will be allowed on non-allocated sites within the neighbourhood area. Monitoring of housing completions is undertaken yearly and if such a situation was to occur it would be addressed through a review of the Local Plan.

6.1.5 The scope of neighbourhood plans is up to the neighbourhood planning body. Groups are not required to plan for housing. If they wish to do so a neighbourhood plan can allocate additional sites to those in a local plan where this is supported by evidence to demonstrate need above that identified in the Local Plan. Consequently, it is important to note that the neighbourhood area housing requirements are not a restrictive maximum figure. Groups can plan for additional sites if they wish and other suitable windfall sites can be brought forward

by developers. Early engagement with the Council is encouraged, where groups wish to exceed their housing requirement figures, to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies.

Housing Land Supply

6.2.1 The identified housing requirement will be met in full through the delivery of housing from a variety of sources. This will include; sites which are already being developed within the plan period (completions), sites which have planning permission (commitments), known housing sources (sites which are currently under consideration by the local planning authority or awaiting a legal agreement) and new site allocations. A housing trajectory has been included in APPENDIX A, which demonstrates that there is a range of sites that are capable of meeting the housing requirement and ensuring a continuous five-year supply of deliverable housing land throughout the plan period. The table below outlines the amount of dwellings expected to be delivered in the five-year periods of the Local Plan. It is however important to note that the housing trajectory does not place any phasing restrictions on the sites and they may come forward sooner than indicated.

Table 6.2 Expected Housing Delivery

Period	Number of Dwellings
~~2025/26 – 2029/30~~2026/27 – 2030/31	~~3217~~3148
~~2030/31 – 2034/35~~2031/32 – 2035/36	~~3266~~3174
~~2035/36 – 2039/40~~2036/37 – 2040/41	~~2223~~2177
~~2040/41 – 2041/42~~2041/42	~~750~~375

6.2.2 There is the need to allocate sufficient land to accommodate a minimum of ~~7,582~~8,330 dwellings within the plan period. The allocations which will contribute to achieving this are set out in Policy H 2. In combination with existing commitments there is sufficient land to surpass the housing target. The allocations and existing commitments have the potential to deliver approximately ~~9,456~~8,474 homes up to 2042. The build out of a number of the strategic sites will also extend beyond 2042. Taking this into consideration the plan has sufficient land for approximately ~~13,841~~12,919 homes.

6.2.3 Further flexibility has been incorporated into the plan as contributions from windfall sites and brownfield regeneration schemes within the urban area have not been included in the allocations / housing trajectory. With regards to the regeneration sites, these have not been included due to site constraints and questions over deliverability. The Council will however be supportive of these sites coming forward providing they are in suitable and sustainable locations. Site 468 Kendrew Street Car Parks and Regeneration Area is however an exception and has been included in the trajectory as there is more certainty that this site will come forward for development. A small sites windfall allowance of 25 dpa has been included within the housing supply and is set out within the housing

trajectory (Appendix A).

6.2.4 The housing requirement is a 'net' figure and must take into account any dwellings that are lost during that period through demolition or change of use. However, the loss of housing through demolition and change of use has been relatively low in Darlington Borough and there are no planned demolition or regeneration schemes identified.

Five Year Supply

6.2.5 There is a requirement to continually monitor delivery and the supply of housing sites to ensure a five-year supply throughout the plan period. The Local Planning Authority will produce a housing position statement at the beginning of each financial year to set out the current five-year housing land supply. The five-year requirement on 1 April ~~2025~~2026 based on the target of delivering ~~7,582~~8,330 net additional dwellings between 2025 and 2042 (~~446~~490 dwellings per year) was ~~468~~521 dwellings per annum which includes a 5% buffer. Table 6.3. below sets out how the figure was arrived at.

Table 6.3 Five year requirement on 1st April ~~2021~~2026

Local Plan Housing Requirement	~~7,582~~8,330 (~~446~~490 dwellings per annum)
Requirement 2025/26	490
Net completions 2025/26	460
Shortfall 2025/26	30 (490 – 460)
Requirement ~~2025/26~~2026/27 - ~~2029/30~~2030/31	~~2,230~~2,480 (~~446~~490 x 5 + 30)
Requirement ~~2025/26~~2026/27 - ~~2029/30~~2030/31 plus 5% buffer	~~2,342~~2,604 (~~2,230~~2,480 x 1.05)
Annual requirement plus 5% buffer	~~468~~521

6.2.6 The five-year housing land supply on 1st April ~~2025~~2026 was ~~3217~~3148 dwellings. Table 6.4. below provides a breakdown of the categories of sites in the five-year supply. At this point in time the Council could demonstrate a 6~~.9~~ year housing land supply, based on the type of evidence relating to deliverable sites required by national policy.

Table 6.4 Summary of five-year housing land supply on 1st April ~~2021~~2026

	Total expected completions: ~~2025/26~~2026/27 - ~~2029/30~~2030/31
A. Sites of <10 dwellings with outline or full planning permission	0
B. Sites of 10 or more dwellings with detailed planning permission	~~1832~~1917
C. Sites of 10 or more dwellings with outline planning permission	~~660~~210
D. Sites with a grant of planning permission in principle	0
E. Allocations without planning permission	~~600~~896
F. Small sites allowance	125
Total	~~3217~~3148

6.2.7 If the situation arose where the Local Planning Authority were unable to demonstrate a five-year supply of deliverable housing sites, there is a fall-back position within Policy H 1. The policy states, in this situation sites which are not allocated, are located beyond development limits but are well related to the built form of the main urban area or service villages will be supported. This is providing they are consistent with relevant national and Local Plan policies.

6.2.8 In the above circumstance, proposals will not be required to accord with Policy H 7 Residential Development in the Countryside but will have to demonstrate that they will be deliverable in the short term, therefore contributing to the five-year supply. The Local Planning Authority may reduce implementation or submission of reserved matters timescales to ensure delivery takes place within the five year period and to ensure the site makes a positive contribution to the five-year supply. It is important to note that small sites can make a positive contribution to the housing land supply. If an application is granted under this situation and subsequently expires, it will not necessarily be renewed automatically if permission is sought again.

6.2.9 If monitoring indicates that there is persistent and prolonged under delivery of housing, a review of this housing chapter and the housing allocations will be undertaken in order to resolve the situation.

Spatial Distribution of New Housing

6.2.10 Development opportunities for housing should be primarily focused in those areas that provide (or will be able to provide) the level of services, infrastructure ~~facilities~~ and employment opportunities that are required to support communities and an increase in the population.

6.2.11 The distribution of sites has followed the existing settlement hierarchy. A large proportion have been focused on the main urban core of Darlington Borough via sites within the main urban area and urban extensions. Strategic urban extensions are focused to the north east and west of the main urban area. ~~Smaller scale extensions are also proposed around the urban fringe.~~ The strategic urban extensions would take some time to deliver due to infrastructure requirements, consequently it was considered necessary to look to the service villages for sites which could be delivered in the short and medium term.

6.2.12 Only the service villages are considered to be suitable for housing development in the Local Plan. The smaller more rural villages as defined in the settlement hierarchy are generally considered to be less favourable locations for housing development as they meet limited sustainability criteria. They are considered to be unsuitable due to their remote locations and lack of facilities / services. As a consequence no housing allocations have been proposed in these areas.

Policy H 2

Housing Allocations (Strategic Policy)

The following sites are allocated for housing development and are identified on the Policies Map. The allocations are required to meet the housing requirement as set out in Policy H 1, taking into account existing commitments (extant planning permissions) and completions since April 2025.

The allocations will assist to meet the Borough's quantitative and qualitative need for housing over the plan period. They will provide an appropriate mix of residential developments in accordance with the objectives set out in Policy H ~~4~~3 and will support the sustainable development of the Borough in accordance with the locational strategy.

The sites will provide a supply of housing land sufficient to annually evidence a deliverable five-year housing supply in accordance with the National Planning Policy Framework.

The yield identified is for indicative purposes only and the final number of homes to be delivered on site will be determined by the planning application process. Development proposals on the allocated sites listed below will be permitted providing the scheme is in accordance with other relevant policies set out in the Local Plan and national policy. Schemes should satisfactorily address any issues or requirements as set out in APPENDIX B HOUSING AND EMPLOYMENT ALLOCATION STATEMENTS.

Table 6.5 Housing Allocations

Location	Site ref	Site name	Site area (ha)	Indicative site yield (by 2042)	Indicative site yield (after 2042)
Urban Extension	20	Great Burdon	~~88.39~~91.44	600	650
	100	Hall Farm, Branksome	21.89	~~400~~353	
	185	Burtree ~~Garden Village~~	178.48	~~1170~~1110	~~830~~890
	251	Skerningham	492.19	1950	2550
	392	Elm Tree Farm	7.10	200	
	504	Snipe Lane, Hurworth Moor, Phase 2	10.28	~~145~~180	

	Urban Area	11	Cattle Mart	2.16	76	
		467	Tees Grange	~~6.84~~7.09	~~89~~75	
		468	Kendrew Street Car Park Regeneration Area	1.34	125	
		471	Land east of Maidendale (former Ingenium Parc)	~~30.65~~42.50	420	300
	Villages	95	Beech Crescent East, Heighington	1.53	20	
	Total				~~**5195**~~**5109**	~~4330~~4390

6.2.13 The policy above indicates that the allocations are capable of accommodating around ~~5,195~~5,109 homes in the Borough throughout the plan period. The housing requirement will also be met by existing commitments on major sites (table 6.7), some of which are currently being built out, net completions since 1st April 2025 and a small sites allowance of 25 dwellings per annum. The table below provides a summary of the overall housing supply expected in the period 2025 to 2042, highlighting that the total supply ensures that the housing requirement will be met and exceeded. The figure of ~~3,836~~3365 homes on commitments is the remaining dwellings to be completed on sites with planning permission as at 1st April 202~~5~~6 over the plan period. It is important to note that extra capacity exists on a number of sites and they are assumed to be delivered after 2042. This includes site 249 Coniscliffe Park North a housing commitment and four of the housing allocations, which total ~~4,385~~4,445 units beyond 2042. Furthermore, no allowance is made for windfalls over one hectare, and the small site allowance of 25 dwellings a year is below the historic average of 37 dwellings per year on such sites.

Table 6.6 Overall housing supply 2025 - 42

Net completions 1 April 2025 to 31 March 2026	460
Commitments (major sites) 1 April 202~~5~~6 to 31 March 2042	~~3836~~3365
Allocations 1 April 202~~5~~6 to 31 March 2042	~~5195~~5109
Small sites windfall allowance 1 April 202~~5~~6 to 31 March 2042	400[20]
Total	~~**9456**~~**9334**

[20] 16 years multiplied by small sites allowance of 25 dwellings per annum (16x25=400).

6.2.14 The indicative yields have been calculated using density multipliers and average developable areas for particular site sizes. Where on-site constraints have restricted the developable area this has been reflected in the yields. Also in cases where more detailed information has been available, for example via a developer proposal in a current planning application, this has been reflected in the yield.

6.2.15 The allocations have been selected taking into account sustainability principles and the following criteria:

- Directing development to within the urban area, as urban extensions and to the service villages, in accordance with the locational strategy;
- Selecting sites in sustainable locations with good access to ~~public transport~~ active travel, services, shops, employment locations and community facilities;
- Including brownfield sites where possible, taking into account site constraints and economic viability;
- Avoiding areas which have significant physical constraints and avoiding environmental sensitive locations;
- Selecting a mix of sites in terms of size and location, which can meet both the quantitative and qualitative housing needs over the plan period;
- Selecting sites which have a reasonable prospect of being delivered within the plan period.

6.2.16 APPENDIX B HOUSING AND EMPLOYMENT ALLOCATION STATEMENTS provides guidance for each housing allocation, outlining site specific requirements, constraints or relevant information. It should be noted that this guidance is not exhaustive and further issues may need to be addressed via a planning application. The statements will also give guidance in some cases on the type of schemes and densities which the Council would be supportive of. Generic issues such as affordable housing requirements will not be set out in the statements as they will apply to most sites. Specific infrastructure requirements will also be dealt with at the planning application stage unless there is a need for on-site provision. This will mainly apply to the strategic urban extensions.

Table 6.7 Housing Commitments

Site ref	Site name	Size (ha)	Total number of dwellings	Remaining dwellings at April 2025 (to be completed pre 2042)
3	South of Burtree Lane	17.02	380	380
8	Berrymead Farm	21.42	348	~~139~~32
41	Coniscliffe Park South	28.32	475	~~475~~472
45	High Stell	8.49	198	~~120~~107
68	West Park ~~Garden Village~~	79.32	1200	~~538~~440
~~78~~	~~East of Middleton Road, Sadberge~~	~~0.75~~	~~25~~	~~3~~
89	Land west of Oak Tree, MSG	2.66	61	36
99	Maxgate Farm, MSG	13.71	260	~~260~~213
146	Land South of Railway, MSG	14.8	326	326
249	Coniscliffe Park North	50.08	985	930
390	West Park ~~Garden Village~~ North	5.54	125	125
394	Lakeside, The Old Brickworks, Neasham Road	5.59	115	~~25~~21
395	Dr Piper House, King Street.	0.13	46	46
403	Blackwell Grange East	5.26	44	~~44~~29
410	Snipe Lane, Hurworth Moor	23.64	449	~~259~~128
412	12 – 18 Skinnergate	0.22	16	16
422	Reservoir (Disused) Darlington Road, Sadberge	2.8	46	46
~~424~~	~~182 Northgate~~	~~0.1~~	~~24~~	~~24~~
425	Former Rise Carr Club, Eldon Place	0.05	18	18
~~426~~	~~Sherborne Close~~	~~0.6~~	~~14~~	~~14~~
~~429~~	~~Eldon Street~~	~~0.13~~	~~12~~	~~12~~
	Total			~~3836~~3365

Policy H 3

Housing Mix

Proposals for housing development will be encouraged to provide an appropriate mix of housing types, sizes and tenures which have regard to local needs as identified within the most up to date Local Housing Needs Assessment or other relevant evidence. A suitable housing mix should also give consideration to a site's location, physical constraints, character and surrounding context.

The Council will support proposals for specialised housing for both older people and those with disabilities to meet identified needs outlined within most recent evidence. Proposed sites for such schemes will be expected to be in sustainable locations close to essential services and facilities and well served public transport routes.

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:

a. ~~57~~59% of all new dwellings will meet category 2 requirements (accessible and adaptable dwellings).

b. ~~8~~7% 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.

All new residential development, including change of use or conversions, will be required to ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers and will be expected to comply with the Nationally Described Space Standards, as set out in Appendix F, unless it can be demonstrated that compliance would compromise the viability, deliverability, or optimal use of the site.

6.3.1 The NPPF requires the Council to plan for a mix of housing to ~~the~~ meet the needs of communities. This includes but is not limited to; those who require affordable housing (including social rent), families with children, looked after children, older people and people with disabilities, students, service families, travellers, people who rent their own homes and people wishing to build their own homes. The overall objective is to widen the choice of high quality homes, widen opportunities for home ownership and create sustainable inclusive and mixed communities. Policy H 3 sets out the Council's approach to meeting these needs.

6.3.2 The Darlington Local Housing Needs Assessment (LHNA) 2025~~5~~6 [21] provides the most up to date evidence of housing need of specific types in the Borough. The assessment considers the specific housing needs for parts of the local community. The evidence indicates that there will be an increasing demand in the future for specialist housing to meet the needs of the elderly and those with physical or learning disabilities. The LHNA quantifies the likely needs of these groups. An ageing population is a national issue and the assessment highlights the importance of meeting the needs of the elderly population when planning for new housing. It is acknowledged that this is not necessarily solely through specialist provision as housing solutions for older people can also be found from general housing and many older people may not want or need specialist accommodation or care. Provision may come in the form of bungalows or homes which can be adapted to meet a change in needs.

6.3.3 Government policy is focused on supporting older people and those with a disability to live independently at home. Supporting independent living can help to reduce the costs to health and social services and providing more housing options for older people can free up homes which are under occupied. Meeting these needs is a challenge, however providing more accessible and easily adaptable homes will help people to maintain independence for longer. This is recognised in Policy H3 with the requirements for standards relating to accessible and adaptable homes. These standards are governed by the Building Regulations and are set out in the 2015 edition of Approved Document M: Volume 1 (Access to and use of dwellings) (2016 amendments)[22]. These standards are part of the optional technical requirements which exceed the minimum standards required by the Building Regulations in respect of access. The Government's intention is that Local Planning Authorities should not apply any additional local standards on requirements relating to the construction, internal layout or performance of new dwellings. The optional technical standards help to streamline standards nationally.

6.3.4 Category 1 requirements are mandatory within the Building Regulations and are classed as a visitable dwelling. Reasonable provision should be made for people to gain access to and use the dwelling and its facilities. A category 2 dwelling is classed as accessible and adaptable and is optional in the Building Regulations. Provision must be sufficient to meet the needs of occupants with differing needs including some older and disabled people and to allow adaptation of the dwelling to meet the changing needs of the occupant over time. A category 3 dwelling is classed as wheelchair user and is optional in the Building Regulations. The provision made must be sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs. The standards will be applied to outline or full applications. They will not be applied retrospectively to previous permissions.

6.3.5 The evidence to support the percentage requirements for accessible and adaptable homes is set out in the LHNA 2025~~5~~6. Modelling work was undertaken in the assessment which utilised national and local data on housing, long term illness and disability, to estimate the number of households likely to require adaptions or needing to move to a more suitable home in the housing market area. The assessment indicated that ~~at least 4,896~~5,216 households ~~will~~may

[21] Darlington Local Housing Needs Assessment, ORS, 2025~~5~~6

[22] Approved Document M: Volume 1 Access to and use of dwellings, HM Government, 2016 amendments

require adapted homes by 20~~36~~42. This represents 6~~5~~6% of the overall housing need for Darlington between 2025 and 2042. More detailed analysis of the data also revealed that at least 5~~80~~45 wheelchair adapted homes will be required over the plan period which results in ~~8~~7% of overall housing in Darlington needing to be M4(3) standard. Subsequently this implies a need for 5~~7~~9% of all new homes to be M4(2) standard (6~~5~~6% minus ~~8~~7%).

6.3.6 With regards to other specific needs, the LHNA outlines that within Darlington Borough there are few students. Most students are either under 18 or are mature students who live in their own home. Local colleges do not provide specialist accommodation for its students. Teesside University has part of the campus in Darlington but this does not provide accommodation. As such, there is limited student impact on the working of the local housing market.

6.3.7 The numbers of service personnel living in Darlington is relatively low compared to the overall population of the housing market area. A large base is located 15 miles away at Catterick and could impact on Darlington if the Borough were ever expected to meet some of the bases housing need. The nations armed forces have been reduced in size over previous years, however there are plans for the base at Catterick to be increased in size in the near future. The Council believes that this growth is to be dealt with in the Catterick Garrison area and ~~Richmondshire District Council~~ North Yorkshire Council have not asked Darlington Borough Council to accommodate any of this growth in the draft Local Plan.

6.3.8 There has been a rise in the relative size of the private rented sector and a decline in owner occupation both in Darlington and across England between 2001 and 2021. The evidence supports continuing demand for and growth in private rented sector homes in Darlington.

6.3.9 The NPPF requires that looked after children are considered as part of the housing mix and references that evidence for this should come from the local authority's Children's Social Care Sufficiency Strategy. The most recent document covering Darlington is the Looked After Children and Care Leavers Commissioning and Sufficiency Strategy Refresh 2025 – 2026. The document states that in Darlington, as of 31st March 2025, there were 265 children and young people looked after by Darlington Borough Council, a large proportion of these children with foster parents. In terms of future needs the strategy identifies a priority to improve the quality of existing accommodation in Darlington. Work is being undertaken to replace existing stock of in-house residential homes with newer homes. It also acknowledges the pressures on the system and that further provision may be required but this is not quantified.

Self-Build and Custom Build Housing

Policy H 4

Self-Build and Custom Build Housing

To improve choice and variety of new housing, proposals for self-build and custom build homes that comply with other policies in this plan will be supported.

On sites of ~~150~~500 dwellings or more at least 1% of the housing plots should be made available as self-build or custom build plots, to meet the demand identified on the Council's self-build register. Each plot shall have access to the public highway and be provided with utility services (water, electricity, gas, telecommunications, foul drainage and surface water drainage) up to the plot boundary. The plots should be well integrated with the wider development.

The plots are to be made available to self-builders or custom builders for a period of not less than 12 months. The value and marketing strategy shall be agreed with the Council before the plots are released for purchase. If the plots are not sold within this time, the requirement to retain the plot for self-build will cease. Proposals for 100% flatted development, conversions of existing buildings, student accommodation or C2 accommodation will be exempt from the requirement to provide self-build plots.

Proposals including self and custom build serviced plots will be required to submit and agree with the Council a design code and plot passport which will set design criteria and specifications.

Evidence will be required at the appropriate stage of the application process to demonstrate how the initial homeowners have had primary input into the final design and layout of the dwelling. A suitable legal mechanism will be utilised to ensure that the homes are constructed as self and custom build.

6.3.10 Custom and self-build is the process by which an individual or association purchases a plot of land and then builds their own home. The process can vary from the individual undertaking the whole process or commissioning architects or builders to assist. The evidence in the LHNA and on the authorities Custom and Self-build Register suggests that there is some demand for self-build plots but this is limited. The Council are however keen to widen opportunities for people to build their own homes as this is an important element of boosting housing supply and meeting housing aspirations.

6.3.11 Since the adoption of the Local Plan in 2022 there have been very few self-build plots permitted. Additional requirements have also been placed on the Council via new legislation. The Housing and Planning Act 2016 placed a duty on local planning authorities to provide sufficient serviced plots which have planning permission to match entries on the register. The Levelling Up and Regeneration Act 2023 also requires authorities to include pre-existing un-met demand for self-build and custom build housing when calculating their current level of demand. As such in order for the Council to meet its duty to provide enough suitable permissions for self and custom build, a low level of serviced plots will be sought on larger housing developments.

Policy H 5

Affordable Housing (Strategic Policy)

In order to meet the needs of people who are not able to access the general housing market, the provision of affordable housing will be expected in residential development schemes of 10 or more dwellings or sites of 0.5ha or more. Exemptions include residential institutions, student accommodation, live work units where the main use is predominantly employment, gypsy and traveller accommodation and non-residential development.

The level and type of affordable housing required in residential developments is as follows:

Table 6.8 Affordable Housing Requirement

Location (wards)	Affordable Requirement	Tenure Split of the Affordable Requirement
Bank Top and Lascelles, Northgate, Park East, Stephenson.	10%	60% social rent ~~100%~~40% affordable home ownership
~~Brinkburn and Faverdale~~, Cockerton, College, Eastbourne, Harrowgate Hill, Haughton and Springfield, ~~Heighington and Coniscliffe~~, North Road, Pierremont, Red Hall and Lingfield ~~Sadberge and Middleton St George~~ and Whinfield	20%	- ~~51~~60% social rent - ~~7% affordable rent~~ - ~~42~~40% affordable home ownership
Brinkburn and Faverdale, Heighington and Coniscliffe, Hummersknott, Hurworth, Mowden, ~~and~~ Park West and Sadberge and Middleton St George	30%	- ~~51~~60% social rent - ~~7% affordable rent~~ - ~~42~~40% affordable home ownership

A map of these areas can be found in APPENDIX E.

Developments of less than 10 dwellings or sites smaller than 0.5ha will not generally be required to make an affordable housing contribution, unless they form part of a rural exceptions site.

The tenure split to be provided on site is set out within table 6.8 ~~and differs across the three requirement areas~~. In determining the type and size of affordable housing to be provided, the Council will also have regard to the evidence in the most recent Local Housing Needs Assessment.

Affordable housing will normally be provided on-site alongside market housing to create balanced communities. As such, the affordable housing should be distributed across sites in small clusters of dwellings. Exceptions to the requirement for on-site provision will be:

a. Schemes which involve the conversion of a building which is not able to physically accommodate units of the size and type of affordable housing which is required within that locality;

b. Specialist accommodation where the management of the building(s) would make it difficult to provide affordable housing on-site (such as sheltered accommodation); and

c. Any other circumstances where the Council considers off-site provision to be preferable to on-site provision; for example where a contribution would result in the delivery of more affordable homes off-site or in a more suitable location when

compared to the policy requirement for on-site provision. Such an approach would be required to contribute to the objective of creating mixed and balanced communities.

In the above circumstances, the requirement should be provided off-site on developer owned land or a financial contribution by way of a commuted sum will be expected, which will be used by the Council to meet affordable housing needs within the Borough. The sum shall be equal to the difference between the open market valuation of the affordable units which would have been provided on-site and the purchase price that the Registered Provider would have been willing to pay for these units.

Where an applicant considers that the provision of affordable housing in accordance with the requirements of this policy would make a scheme unviable, they must demonstrate the particular circumstances that have changed since the viability assessment undertaken at the plan-making stage that justify the need for a viability assessment at the application stage. Applicants must also submit a detailed viability assessment to demonstrate that this ~~is the case~~ policy requirement is unviable and to show the maximum level of affordable housing that could be delivered on the site. The Council will have regard to all the circumstances in the case when apportioning weight to the viability assessment. The applicant will be expected to deliver the maximum level of affordable housing achievable. All submitted viability assessments should follow the recommended approach in national planning practice guidance including standardised inputs. All viability assessments will be made publicly available.

6.4.1 Affordable housing provides opportunities for people who are unable to access the housing market. It provides suitable housing for people who cannot afford to rent or buy on the open market and also for those people who work in different aspects of the economy. It also assists in reducing homelessness and overcrowding. Currently affordable housing is delivered within the Borough by Registered Providers and the Council. The Council's stock comprises of approximately 5269 homes. The Council are aware of the need for affordable homes in the Borough and therefore are very much active in delivery. ~~Delivery is currently focused largely on affordable rent schemes due to a lack of government subsidies for social rent.~~ The different types of affordable housing are set out in the NPPF ~~and outlined below~~. Dwellings that do not meet the definitions of affordable housing in national policy will not be considered as affordable housing for planning purposes.

- ~~**Social Rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.~~

- ~~**Other affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).~~

- **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

- **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

6.4.2 Darlington Borough does have a substantial need for affordable homes and detailed evidence is provided in the LHNA (2025~~5~~6). The assessment provides an analysis of the social, economic, housing and demographic situation across the Borough and identifies a need of ~~185~~219 affordable dwellings per annum over the plan period, a total of ~~3,148~~3,724. This would equate to approximately 4~~1~~5% of the housing requirement figure (~~446~~490 dwellings per annum as outlined in Policy H 1). The affordable need is broken down into ~~1,598~~1,809 dwellings required for social rent (~~94~~106 dwellings per annum), ~~227~~230 dwellings required for affordable rent (~~13~~14 dwellings per annum) and ~~1,323~~1,685 dwellings for households aspiring to home ownership (~~78~~99 dwellings per annum). Given the level of affordable housing need identified, it is important to maximise the amount of affordable housing that can be delivered through market housing led developments. Key to this is the economic viability of such developments.

6.4.3 Policy H 5 will assist in achieving delivery of affordable homes via market led housing schemes. It sets out the affordable housing requirement for schemes of 10 or more dwellings and sites of 0.5ha or more within particular areas of the Borough. The requirements within policy H 5, including the tenure split, have largely been informed by data from the LHNA 2025~~5~~6 and ~~previous evidence~~ Local Plan viability testing. The LHNA (2026) identifies an overall affordable housing need of 45% of the overall housing requirement. Local Plan viability testing has examined the impact of the affordable housing need requirement on the viability of housing development across the Borough. This has demonstrated that an affordable housing requirement of 45% would not be viable so affordable housing requirements are set at a lower viable level for each of the respective value areas. ~~Local Plan viability testing will take place at the next stage of plan making and will inform the publication draft~~. ~~This will~~ As the affordable housing requirements are set at a lower level than overall identified affordable housing need a slightly higher proportion of social rent housing is required in Policy H 5 in comparison to the proportion identified in the LHNA as the Council wish to prioritise this tenure. This is because it is considered that those who require social rent have more pressing housing needs. Whereas those who aspire to affordable home ownership are derived from those who can afford private rent but would like to own and therefore these households are currently suitably housed. ~~examined the impact of the affordable housing requirements on the viability of housing development across the borough. If necessary, the percentages will be altered within policy H 5 to~~

~~ensure the requirements are viable.~~ The policy ~~is to be~~has been prepared so as to not stifle overall development and to contribute to affordable need. It is acknowledged that 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 justify and substantiate this consisting of a viability assessment. Where the evidence is considered to be satisfactory, lower levels of affordable housing provision will be explored.

Rural Exception Sites

Policy H 6

Rural Exception Sites (Strategic Policy)

Affordable housing schemes closely related to the identified development limits of the service villages and rural villages will be permitted providing:

a. Affordable housing need in the local area has been demonstrated;

b. Local need cannot be met on sites within the settlement limits;

c. The type and size of housing provided reflects identified local need;

d. Arrangements exist to ensure the housing will remain affordable in perpetuity; and

e. The site is well-related to the settlement and local services and does not conflict with other policies in the Local Plan.

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.

6.5.1 The housing market can be stronger in rural areas with prices generally higher than similar properties in urban areas and suburbs. This can make it difficult for people who want to live close to their families in such areas or for those whose employment is based in the rural area. It can also result in younger people moving out of village areas subsequently resulting in an imbalance in the age structure of the rural population.

6.5.2 In the LHNA (2025~~5~~6) there is limited spatial evidence for the distribution of additional affordable housing needed. As such, there is no evidence of specific unmet needs for additional affordable housing in the service villages or any of the other villages / hamlets in the Borough. If it can be demonstrated by a local needs survey that there is a need for additional affordable homes in these areas, Policy H 6 allows for the provision of affordable dwellings on the edges of villages. The survey would normally be carried out by a parish council or Registered Provider and would have to satisfy the Borough Council. Where supported by a detailed viability assessment, a small proportion of market housing may be provided if it can be demonstrated that it is necessary to deliver the affordable dwellings.

Residential Development in the Countryside

Policy H 7

Residential Development in the Countryside (Strategic Policy)

New isolated dwellings in the countryside will be avoided. New permanent dwellings will only be permitted where they meet criteria set in national policy.

Proposals for rural workers dwellings will need to demonstrate:

i. an essential need to live permanently at or near their place of work in the countryside; and;
ii. provide evidence as to why the need for on-site accommodation cannot be dealt with by other means, such as CCTV surveillance, or met in another way through alternative accommodation in the existing local housing stock within a reasonable distance; and;
iii. the location of the proposed residential accommodation has been carefully considered to minimise visual impact on the countryside and any neighbouring land uses.

The replacement of residential buildings in the open countryside will only be permitted providing;

a. There is no detrimental effect on the character, appearance, historical context and amenities of the site and surroundings;

b. The existing dwelling has a lawful use, has not been abandoned, and is not a caravan, mobile home or other temporary structure;

c. The size of the new replacement dwelling is not significantly larger than the original house volume or footprint;

d. The number of new dwellings is no more than the number of dwellings to be demolished and replaced; and

e. They are positioned on the footprint of the existing dwelling, unless a more appropriate location is identified for landscape, highway safety, neighbouring residential amenity, or other environmental reasons.

Extensions to existing residential dwellings in the countryside, which require planning permission, will be permitted providing there is no significant detrimental impact on the character of the dwelling or its setting.

Where planning permission is required for the conversion or change of use of buildings in the countryside to residential use (defined by being outside development limits) proposals will be permitted where it has been demonstrated that they are no longer required for their original purpose and there is no potential for conversion to non-residential use.

Proposals for conversion and change of use to residential uses will be expected to meet the following criteria:

f. The building is of permanent construction and capable of conversion without major reconstruction or rebuilding as demonstrated by a structural survey;

g. The proposal is largely accommodated within the existing building(s). Any extensions that are required must be subordinate in scale and proportion and of a suitable design to ensure that they are in keeping with to the original dwelling;

h. The proposed use does not detract from its setting in the immediate landscape;

i. Conversion is capable without prejudicing any viable agricultural operations on an active farm unit;

j. The conversion in itself will not generate a need for future building in the countryside;

k. The access to the site and approach roads are suitable for the levels and type of traffic likely to be generated; and

l. The development would not result in unacceptable amenity levels arising from nearby operations or conflicting uses.

6.6.1 National planning policy states that isolated new dwellings in the countryside should be avoided. They will only be permitted in the circumstances as set out in national policy, for example if it can be demonstrated there is a specific need for a rural worker(s) or are of exceptional design quality.

6.6.2 Replacement dwellings and extensions to existing dwellings can have a significant adverse impact on the character of the surroundings and/or on the existing property itself. Such proposals should meet the criteria in Policy H 7 above. The replacement of rural dwellings will be carefully controlled to avoid the loss of buildings that are worthy of retention, (e.g. those identified as non-designated heritage assets and/or making a positive contribution to the character of the area). Where buildings are worthy of retention, applicants will have to demonstrate to the satisfaction of the Council that they are not capable of renovation.

6.6.3 Not all changes of use or conversions to residential require planning consent. Rights to convert existing buildings are set out in the General Permitted Development Order regulations. Advice can be sought on these regulations either on the government's Planning Portal website or by contacting the Local Planning Authority.

6.6.4 The re-use of agricultural buildings for purposes that benefit the rural economy are the preferred option to promote and enable growth of the rural economy. This accords with the NPPF as it outlines that isolated dwellings in the countryside should be avoided unless there are special circumstances.

6.6.5 Policy H 7 will also be used in the consideration of the conversion or change of use of non-agricultural buildings in rural areas and can include buildings such as public houses and petrol filling stations. Where such a building is considered appropriate for conversion but is already in some form of economic use it will be necessary to demonstrate that the existing (or most recent) use is no longer required or viable. It is acknowledged that the re-use of such buildings is not always viable. Subsequently conversion to residential use may be suitable providing the criteria in Policy H 7 is met.

6.6.6 Where the conversion of the property to residential is to be considered, the building must be capable of conversion without substantial alteration and extension. To demonstrate the building is sound, any proposal must, through the submission of a professionally prepared structural report, confirm that the building is free from major defects and can be converted without significant alterations or substantial demolition and rebuild. Where a building is beyond repair or restoration or requires major reconstruction any proposal for replacement or rebuild should be considered against Policy H 7.

6.6.7 In addition, the loss of a building in the countryside to a dwelling should not result in the demand for further building in the rural area. For example, the loss of a barn to a dwelling should not result in the farm holding requiring the construction of a further barn or building for a similar function.

Housing Intensification

Policy H 8

Housing Intensification

~~**A) Subdivision of dwellings to HMO's and self-contained flats**~~

~~In circumstances where planning permission is required for self-contained flats and Houses in Multiple Occupation (HMOs), permission will normally be granted where it can be demonstrated that there will be no significant impact on the following:~~

~~i. Privacy of existing homes and gardens of neighbours - must be maintained and ensured for new occupiers;~~
~~ii. Vehicular access or car parking – both in terms of highway safety or visual, noise or light impact on neighbours;~~
~~iii. Service provision – there should be sufficient space to accommodate adequate bin storage and accommodate other ancillary functions for the increased number of residents;~~
~~iv. Housing stock – to protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling, the subdivision of existing properties of less than 4 bedrooms will not be permitted.~~

~~Applicants will be expected to submit evidence to demonstrate that there will be no significant impact on the criteria outlined above. All development proposals should have regard to the Council's SPD on HMO's or any other relevant guidance.~~

Back land or garden development

The development of back land or a residential garden for a new dwelling will not normally be permitted. A limited scale of development may be acceptable in these circumstances providing it does not have a significant adverse impact upon the following:

v. Garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats;

vi. The privacy of existing homes and gardens of neighbours or occupiers of the new development;

vii. Vehicular access or car parking – both in terms of highway safety or visual, noise or light impact on neighbours;

viii. Existing trees, shrubs and other wildlife habitats.

All development proposals should have regard to the Design of New Development SPD (2011), or most recent version.

6.7.1 National planning policy allows Councils to set out policies to resist inappropriate development, to set out their own approach to housing density to reflect local circumstances and requires consideration to be given to a policy controlling inappropriate development of residential gardens. Because these issues are often locally contentious, a policy is considered appropriate, to provide more clarity for applicants and decision makers alike.

~~Sub-division of Existing Housing Stock including HMOs and Self-contained Flats~~

~~**6.7.2** High concentrations of sub-divided housing stock or other forms of Homes in Multiple Occupation (HMOs) can cause problems within a local community if not properly managed. Changes to permitted development regulations have made it easier for such properties to be created, and they can form a vital part of the overall housing mix. However when concentrations get too high, problems can arise, to the detriment of the amenity of existing residents.~~

~~**6.7.3** The creation of HMOs and self-contained flats has increased in recent years, in response to the increasing number of smaller households and the need for more affordable, low cost housing. Needs are expected to increase further in response to changes to housing benefit payments. HMOs of three to six unrelated individuals who share basic amenities in a single property (Use Class C4) do not require consent under the General Permitted Development Order so local authorities have less control than previously over the establishment of such properties. The Council are, however, in the process of putting in place an article 4 direction, so that all HMOs in the borough require planning permission despite their size. This will give the Council greater control over the provision of this type of housing and will help to mitigate the negative impacts. It is anticipated that this will be established by July 2026.~~

~~**6.7.4** New HMOs and self-contained flats have generally been achieved by building new properties and converting large houses or commercial properties. In some instances, their provision can be detrimental to the amenity of existing residential areas. A concentration of these properties can lead to problems such as a shortage of on street parking, increased noise and disturbance and inadequate bin storage areas, whilst short term lets and low levels of owner occupation can be associated with lower standards of maintenance and environmental decline. The conversion of existing larger homes can also reduce the proportion of family homes in an area, and result in an unbalanced community. As such, this could prejudice the plan's environmental improvement and regeneration objectives.~~

~~**6.7.5** Whether a residential property is considered acceptable for conversion will depend on size, unsuitability for continued family occupation or long-established use. Acceptable areas for conversion are likely to be close to town centres or services and facilities, or within mixed use areas providing there is no risk of flooding.~~

Back Land or Garden Development

6.7.6 National policy excludes private residential gardens from the definition of previously developed land, consequently there is no presumption that garden land is suitable for new housing. In general the Council will not support proposals for new dwellings within the garden areas to the rear of existing homes as this type of relationship between properties can result in poor levels of amenity and issues with vehicle access. Proposals for development of back land sites in other uses will be considered subject to the criteria in Policy H 8 above and other relevant policies.

6.7.7 In order to safeguard a range and choice of housing, including properties with larger than average gardens at the upper end of the property market, and to maintain local character, biodiversity and amenity space, the Council will resist proposals for developments on garden land.

Houses in Multiple Occupation (HMOs)

Policy H9

Houses in Multiple Occupation (HMOs)

To create inclusive, mixed and balanced communities and to protect residential amenity, development for HMOs will be expected to ensure that:

a. the property is located where increased traffic and activity would not be detrimental to local amenity;
b. the intensity of use would not adversely affect the character and function of the surrounding area;
c. the proposed use would not harm heritage assets;
d. the proposal would not be detrimental to the amenities of neighbouring properties by causing undue noise, disturbance or loss of privacy;
e. adequate provision for vehicle parking, cycle storage, servicing, refuse, recycling arrangements and, where appropriate, the management and maintenance of the property can be demonstrated through the submission of a management plan;
f. the proposal would not result in an over concentration of HMOs within the locality or lead to an unacceptable change in the character of the area; and
g. the accommodation provides a good standard of well proportioned, useable living space and amenity for occupiers of the HMO.

The conversion of an existing property to an HMO will not be supported where there is insufficient provision of in-curtilage parking and where there is an already significant demand for on street parking by surrounding properties, unless there is a good supply of nearby public parking provision.

A House in Multiple Occupation (HMO) is defined under planning legislation as a house or flat occupied by a certain number of unrelated individuals who share basic amenities and is classified by the Uses Classes Order as Class C4 (between three and six residents); and Sui Generis (more than six residents). Planning permission is not required for changes of use from Class C3 (residential) to Class C4 (HMO) unless an Article 4 Direction has been made for a particular area. Darlington Borough Council has designated an Article 4 Direction for HMO development in Darlington, which came into effect on 28th July 2026.

HMOs can provide accommodation for a wide range of groups including professionals, students, migrants and people on low incomes. In Darlington, there is a strong HMO market

in central Darlington and in close proximity to the hospital, predominantly catering for groups who need single person accommodation at low cost.

HMOs provide a form of low-cost housing, particularly for students, younger people and people on low-incomes. They provide flexible accommodation for people with short-term housing requirements. This includes people in-between properties, people employed on short-term contracts and people who are saving to purchase a home. They also provide housing for people that simply prefer to live with large numbers of other people, such as friendship groups. Given the limited number of purpose-built private rented HMOs in the borough, the sector is likely to be reliant on conversion of existing properties.

Notwithstanding their importance in meeting housing needs, poor quality HMOs, or an over concentration of them, can have significant negative impacts and have caused concern to local residents and Members. These concerns include: transient populations; anti-social behaviour; noise and nuisance; changing character of an area; living conditions and property standards; impact on parking and highways; mismanagement of waste; and poorly maintained properties and gardens. This can impact the lives of their sometimes more vulnerable occupants and their surrounding neighbourhoods. In addition, landlords are often better placed to acquire properties than local families, thus undermining the ability of larger family households to meet their needs.

Development for HMOs will need to demonstrate that they would not have a detrimental effect on the character and function of the locality, its local amenity or neighbouring properties. When considering whether there is an over concentration of HMO properties within the locality, the Council will consider each proposal on its individual merits, taking account of the number of existing HMOs (where possible), clustering and the character of the area. As shared accommodation tends to provide smaller living accommodation than single dwelling houses, particular attention will be given to

~~Accommodating Travelling Groups~~ (moved to later in the document)

~~**6.8.1** Darlington has a long association with Gypsies and other Travelling groups with people from these groups accommodated on dedicated sites and within general housing. The Darlington Local Plan 2025-42 makes provision for travelling groups at the existing larger council owned sites together with other smaller, often private, sites within the Borough to accommodate for Gypsies and Travelling groups. It also indicates that additional accommodation to meet needs over the plan period should be allocated in accordance with a set of criteria, such criteria also being the basis for making decisions on windfall sites.~~

~~**6.8.2** The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in the DCLG's August 2015 Planning Policy for Travellers Sites (PPTS).~~

~~Existing Sites and Commitments~~

~~**6.8.3** To provide a robust evidence base for the pitch and plot targets set out in this policy, a Gypsy and Traveller Accommodation Needs Assessment (2025) has been carried out. This has been supplemented with information by the Council's Annual Caravan Count July 2025. Table 6.9 shows existing pitches in~~

Darlington in 2025 [23].

Table 6.9 Existing Gypsy and Traveller Pitches

Pitches	Transit Pitches	Total
152	16	168

6.8.4 Two new sites which are owned by the Council have been provided by the Homes and Communities Agency (HCA now Homes England) through the Traveller Pitch Fund (2011-2015) / Affordable Homes Programme (AHP) (2015-2018) funding. One site, Rowan East, has 16 pitches with amenity blocks and 4 chalet pitches and was completed in March 2015. A further site, formerly known as Neasham Road, was completely regenerated and upgraded in 2017 to a size of 22 pitches, all with enlarged amenity blocks. The standard of accommodation is of the highest standard and have been used as a 'quality of design demonstrator project' by the HCA in England for Gypsy and Travellers Sites based on the new caravan licence standard from 2014.

Gypsy and Traveller Accommodation Needs Assessment (GTAA) 2025

6.8.5 The most recent Gypsy and Traveller Site Needs Assessment (GTAA 2025) [24] came to the conclusion that Darlington Borough is well catered for in terms of supply for Gypsy and Traveller pitches. An annual need of 1.8 pitch per 5 years was identified from 2025-2029.

6.8.6 Further need arises for residential pitches in the period of 2030-2042 which has been calculated on a projection basis of 37 pitches, an annualised need of 2.8 pitches.

6.8.7 No need for Travelling Showpeople plots has been identified in the Local Plan Period until 2042.

Policy H 9

Gypsy and Traveller Accommodation (Strategic Policy)

The council will seek to address the Gypsy and Traveller accommodation needs over the Plan period, as identified in the Gypsy and Traveller Accommodation Needs Assessment by:

a. Safeguarding of existing larger Gypsy and Travellers Sites (20 pitches plus);

b. Safeguarding of private dedicated smaller Gypsy and Travellers sites, and;

[23] GTAA December 2025 / DBC Annual Caravan Count July 2025.

[24] By ORS Consultants December 2025

c. The extension to existing Council sites at Honeypot Lane (8 anticipated pitches) and an extension to the Rowan West / East complex site (25 anticipated pitches) off Neasham Road, and;

d. Allowing new sites to provide accommodation for Gypsies, Travellers and/or Travelling Showpeople where:

i. the site is clearly demarcated with pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area;

ii. the site allows satisfactory access to local schools and other amenities;

iii. the site design takes account of the needs of residents, and provides an appropriate pitch layout and adequate facilities for parking, storage, play and, if required, grazing space for livestock;

iv. there is safe access for pedestrians, cyclists and vehicles, including for turning and parking, vehicles towing caravans, emergency services and servicing requirements, including waste collection;

v. all necessary utilities can be provided on the site including mains water, electricity supply, drainage, sanitation and provision for the screened storage and collection of refuse, including recyclable materials; and

vi. the proposal would avoid any unacceptable adverse impact on the amenity, health or living conditions of neighbouring residents or any other neighbouring uses, including as a result of flood risk, excessive noise, dust, odour, lighting, traffic generation, the keeping of livestock or other activities.

6.8.8 The three existing larger council owned sites at Honeypot Lane and Rowan East & West will continue to be safeguarded to provide for accommodation needs. A range of existing private dedicated smaller sites will complement these and be safeguarded for use as Gypsy and Traveller sites, for up to the number of pitches currently authorised and licensed.

6.8.9 In addition, there are a significant number of unimplemented planning permissions for Gypsy and Traveller sites within the Borough, all on private land, providing for small family units. These are anticipated to meet some of the need for additional pitches and for the five-year supply of pitches. These pitches are spread throughout the Borough, with some concentrations in the Hurworth Moor and North of Brafferton area. Together, they make a considerable contribution to a particular need of some Gypsies and Travellers to own their own site. As some of these planning permissions are not for specific families, there is a potential that some will be let to families who wish to live on a smaller site, but who cannot afford to buy their own site.

6.8.10 National policy indicates that Local Planning Authorities can make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Local evidence over the last 25 years supports making an allowance for 4 pitches per year coming forward as windfalls.

Skerningham Allocations

6.9.1 Skerningham ~~Garden Village~~ is a 487-hectare site~~, covering two allocations,~~ bordered by the Skerne River and Barmpton village to the north, the A167 to the west, Darlington's urban edge and the A66 to the south, and agricultural land to the east. It is bisected by the East Coast mainline. Most of the site is situated within the Sadberge and Middleton St George Ward, with the remainder located in the wards of Harrogate Hill and Whinfield. The majority of the area is currently in agricultural use, but the site allocation~~s~~ also includes Darlington Golf Club, areas of recreational open space, Skerningham Community Woodland and a network of formal and permissive Public Rights of Way.

6.9.2 The Council adopted a design code for the development of Skerningham ~~Garden Village~~ on 28th September 2023 which sets out the strategic design requirements that need to be applied in developing a successful scheme. Subsequently, the Council agreed the developer-led Masterplan for Skerningham ~~Garden Village~~ on 3rd December 2024.

Policy H 10

Skerningham – Site Allocation (Strategic Policy)

~~Two allocations are~~ An allocation is identified on the North side of Darlington at Skerningham (Site Reference~~s~~: 251 ~~& 505~~) to secure the delivery of a mixed use development of up to 4,500 dwellings and approximately ~~22ha~~ 13.46ha (gross) 9.42ha (net) of employment space. During the plan period to 2042, this site is expected to deliver approximately 1,950 dwellings of which 600 dwellings are to be delivered on land adjacent to the A167 and west of the East Coast Mainline on the western part of the allocation; and 1,350 dwellings to be delivered on land to the east of the east coast mainline on the eastern part of the allocation with initial phases located on land adjoining Barmpton Lane.

Development at Skerningham will be permitted in accordance with the principles set out below and other relevant policies in the Local Plan.

A comprehensive masterplan and infrastructure phasing plan for Skerningham ~~Garden Village~~, led by the applicants and prepared in consultation with the community, was agreed with the Council on 3rd December 2024. This masterplan informs the mix of uses, layout, scale, design, provision of local and strategic infrastructure including social and community facilities and phasing of the proposed development. The masterplan is based on a strong understanding of the characteristics of the site and its surrounds and incorporates the key principles for the development as set out in points a. to j. below.

To ensure that a cohesive development is delivered at Skerningham, the Council will only approve planning applications that adhere with the agreed comprehensive masterplan and the Council's Skerningham Garden Village Design Code SPD and deliver the necessary local and strategic infrastructure, including social and community facilities, at the appropriate phase of the development identified in the infrastructure phasing plan to support the coordinated provision of infrastructure and housing development. Future revisions of the comprehensive masterplan must continue to be based on the design approach and principles established in the Council's Design Code for Skerningham and should incorporate the points set out in a. to j. below.

The key principles for the development of Skerningham ~~Garden Village~~ are shown on the illustrative Masterplan Framework (Figure 6.1), including ~~broad~~ indicative locations for land uses and facilities. The site will provide:

a. A mix of housing types, tenures and sizes, including ~~20~~30% affordable housing and 1% self/custom build housing, informed by up-to-date evidence of the housing needs

of the Borough and Policies H 3, H 4 and H 5, with higher densities being incorporated close to public transport routes and neighbourhood centres;

b. A centrally located and well-connected neighbourhood centre providing local community facilities including a health hub for GPs and Dentists, clustered with other facilities and services to meet the day-to-day needs of residents, education, employment opportunities, retail and food and drink (excluding hot food takeaways) facilities. These facilities should be of a scale and type proportionate to the nature of the development and shall be delivered in accordance with the infrastructure phasing plan. Policies TC 1, TC 4 and TC 5 will not apply to proposals in accordance with these requirements;

c. Other local community facilities to serve residential areas as required, closely related to public transport, walking and cycling facilities, and shall be delivered in accordance with the infrastructure phasing plan;

d. Up to two primary schools, associated nursery provision (a total of 5.6 hectares) and a reserved space for a secondary school (5 hectares), with a primary school being delivered on land to the east of the East Coast Mainline before the occupation of the 450th dwelling on land to the east of the East Coast Mainline subject to available capacity within existing or other newly created local schools (see Policy IN 10) and the phasing requirements established in the infrastructure phasing plan. The timescales for the delivery of the additional primary school (if necessary) and the secondary school ~~would~~ should be identified in the infrastructure phasing plan. ~~and/or through the review of infrastructure requirements prior to the occupation of the 1,650th dwelling where the education requirements and capacity levels will be considered;~~

e. 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, shall be delivered in accordance with the infrastructure phasing plan;

f. Principal vehicular access points from the A167, A1150 and Barmpton Lane and include appropriate measures to mitigate the impact of development on the local road network. The phased implementation of the highways works and improvements will be linked to appropriate phases of development within the plan period. This shall include, but not be limited to the following schemes from the Infrastructure Delivery Plan, exact details to be identified as part of the comprehensive masterplan, infrastructure phasing plan and any future planning applications for the site:

   i. A66/Little Burdon Circulatory Upgrade
   ii. A1150/ Thompson Street East Roundabout Improvements
   iii. A167/Burtree Lane Junction Improvements
   iv. Barmpton Lane upgrade works including its junction with Whinbush Way

g. 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 junction on the A1150. This will be achieved through the following;

   i. Prior to the occupation of the first dwelling on land on the western part of the allocation (between the A167 and the East Coast Mainline) the section of the local distributor road between the A167 and the primary development access point shall be delivered.
   ii. Prior to the completion of the development on the western part of the allocation (between the A167 and East Coast Mainline) the remaining section of the local distributor road to the East Coast Mainline shall be delivered.
   iii. Development of the initial phases of development on the eastern part of the allocation will be accessed via Barmpton Lane and/or Bishopton Lane. Prior to the occupation of between the 200th and 450th dwelling on the eastern part

of the allocation, between the East Coast Mainline and the River Skerne, the section of the local distributor road between Barmpton Lane and Bishopton Lane shall be delivered.

iv. Prior to the occupation of between the 900th and 1500th dwelling the local distributor road between the A167 and the A1150 (including the bridge crossing of the East Coast Mainline) shall be completed in its entirety.

Precise details of the road and development access points, together with a timetable for its implementation, shall be agreed with the Council as part of the comprehensive masterplan, infrastructure phasing plan and any future planning applications for the site;

h. Deliver approximately ~~22ha (net)~~ 13.46ha (gross) 9.42ha (net) of employment space to the east of the River Skerne, as shown on the Masterplan Framework ~~within Site 505~~.

i. Other necessary infrastructure as required by the Infrastructure Delivery Plan and identified at the time of submitting a planning application;

j. A network of green and blue infrastructure, the phasing of which is to be agreed with the Council as part of the infrastructure phasing plan, that:

i. retains and enhances the network of safe, attractive and accessible public rights of way, footpaths and cycle routes across the site;

ii. protects and enhances the River Skerne, its valley setting (see Policy ENV 7), and the green corridors (see Policy ENV 3). Where infrastructure crosses these corridors mitigation measures should be provided;

iii. delivers a net gain in the area of publicly accessible community woodland on the site;

iv. provides a pattern of well-integrated and inter-connected green spaces (along with provision for their long-term maintenance) across the site providing for the green infrastructure needs of the local community, including wildlife friendly natural spaces, sport and recreation facilities and allotments in accordance with Policies ENV 4, ENV 5 and ENV 9;

v. protects the amenity of existing residential properties (see Policy HC 2);

vi. wherever possible retains and enhances hedgerows and trees that contribute to landscape character;

vii. mitigates the impact on biodiversity (see Policy ENV 7) and aligns with wider ecological networks beyond site boundaries;

viii. incorporates sustainable drainage systems; and

ix. retains the openness and separation of the rural gaps between Darlington and the villages of Great Burdon and Barmpton (see Policy ENV 3).

Proposals will be required to conserve, and where appropriate enhance, designated and non-designated heritage assets within and in the vicinity of the site including their setting in accordance with Policy ENV 1. The design and layout should be carried out in accordance with the recommendations of the Darlington Local Plan Heritage Impact Assessment (2019) to avoid and minimise harm and provide opportunities for enhancement where appropriate.

Development should be located outside of areas of flood risk, and should be planned sequentially (Policy DC 3), placing the most vulnerable development in the lowest areas of flood risk, and proposals should be supported by a Flood Risk Assessment.

As the development is expected to extend beyond the plan period, in line with national policy and

guidance, infrastructure requirements and the infrastructure phasing plan will be kept under review.

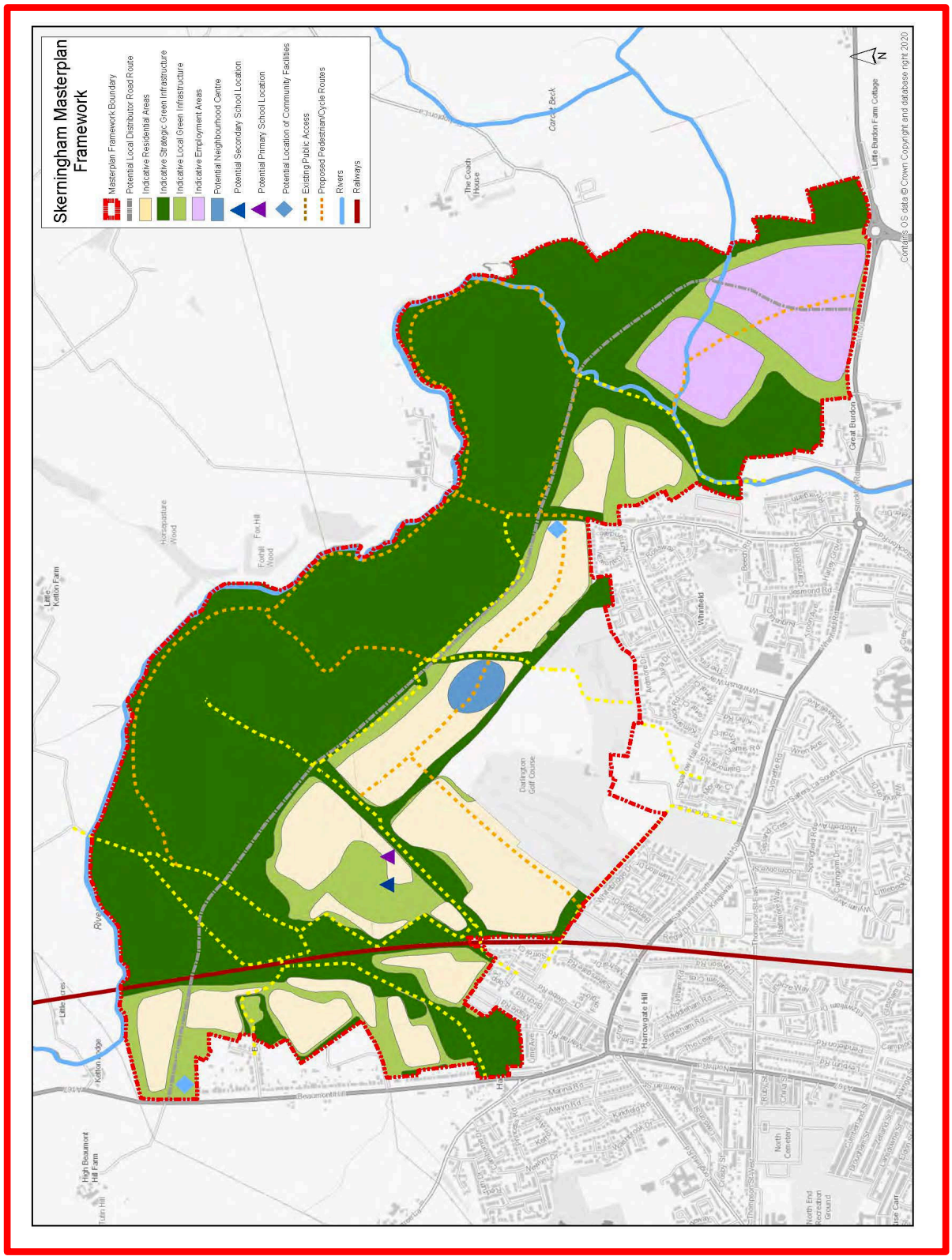
Given the need for early delivery of common infrastructure at Skerningham, most notably the East Coast Mainline Bridge and the Local Distributor Road, it may be necessary to forward-fund those items of infrastructure which are to be wholly or partly funded through Section 106 contributions, before all of those Section 106 contributions have been paid and/or secured via Section 106 obligations. However, it must be possible to recoup such forward-funding when planning applications for development which will be enabled by and/or benefit from such infrastructure come forward. In such circumstances, the Council will seek retrospective Section 106 contributions, at the appropriate contribution rate, in relation to such planning applications, even if they are not made until after the relevant item of infrastructure has been fully completed and/or fully (or partially) funded.

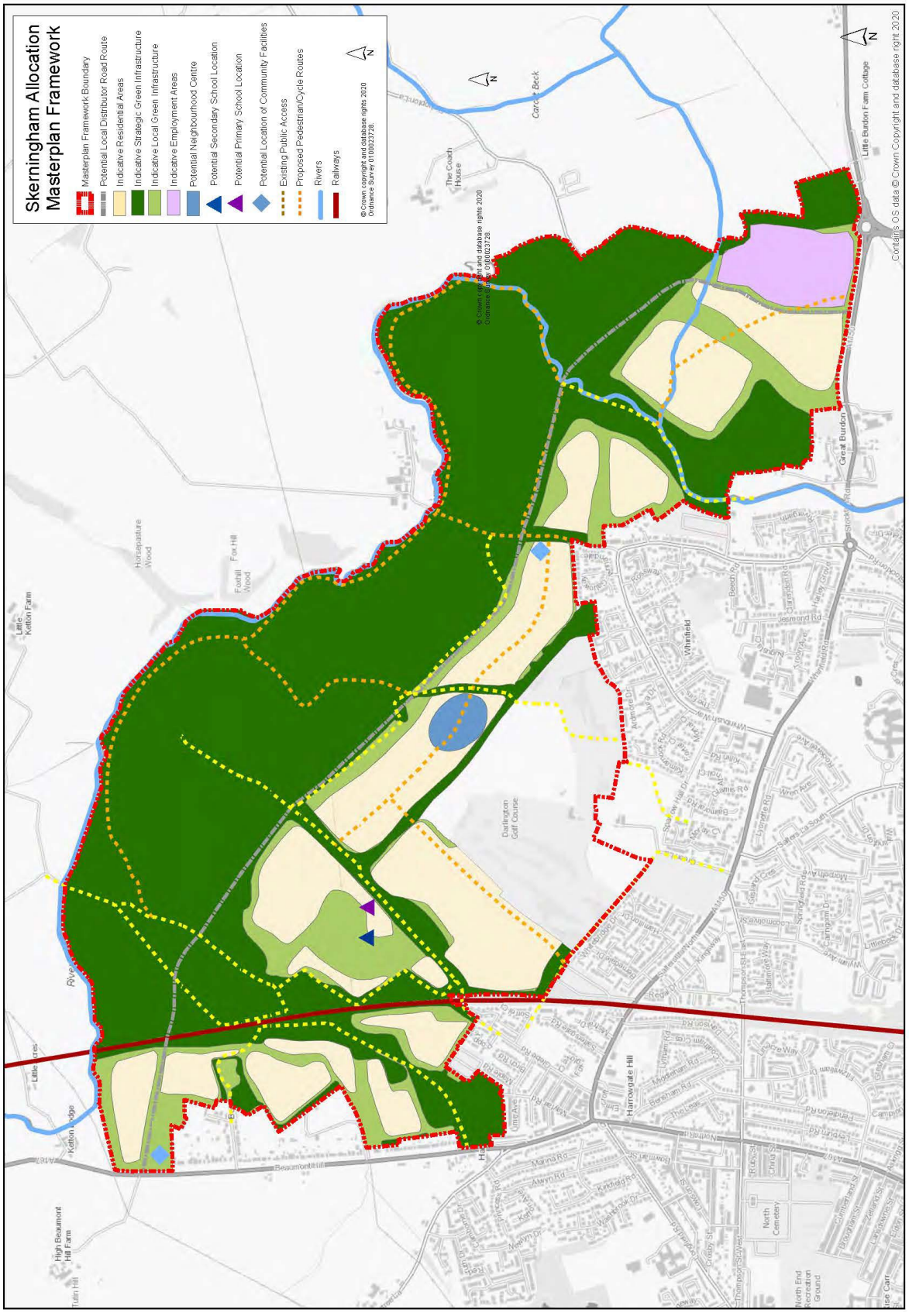
6.9.3 The Skerningham area to the North East of Darlington, was identified as having potential for housing development as part of the Local Plan Issues and Scoping consultation held in August 2016. In November 2016, the Council's Cabinet agreed to engage with the Advisory Team for Large Applications (ATLAS), now part of Homes England, to investigate how this part of the Borough could contribute to meeting the Borough's housing needs in a planned, sustainable way.

6.9.4 Working with the Council, the sites promoters and major landowners started a masterplanning exercise for the site in 2017. The masterplan was prepared with a focus on the landscape and biodiversity context of the site, its heritage assets, and its relationship with existing communities, adopting the Healthy New Town principles to its layout and design (see Policy DC 3). The masterplanning process was informed by a number of studies to identify the opportunities and constraints of the area including landscape, ecology, ground conditions, historic assets, transportation and accessibility as well as establishing the infrastructure and community facilities that will be required to support a sustainable community, integrated with the existing urban area. A draft masterplan was also the subject of public consultation organised by the site's promoters during the Autumn of 2017. This work, along with the feedback from consultation, has in turn informed the ~~following~~ illustrative Masterplan Framework~~s~~ and the policy requirements for the strategic allocation~~s~~.

6.9.5 The following Masterplan Framework illustrates the key principles for development of ~~the~~ Skerningham ~~site~~ emerging from the initial masterplan process and reflected in the policy, with the golf ~~club~~ course remaining ~~in-situ~~ undeveloped. This is the current approach to the development of Skerningham ~~Garden Village~~, and the agreed masterplan is based on this framework.

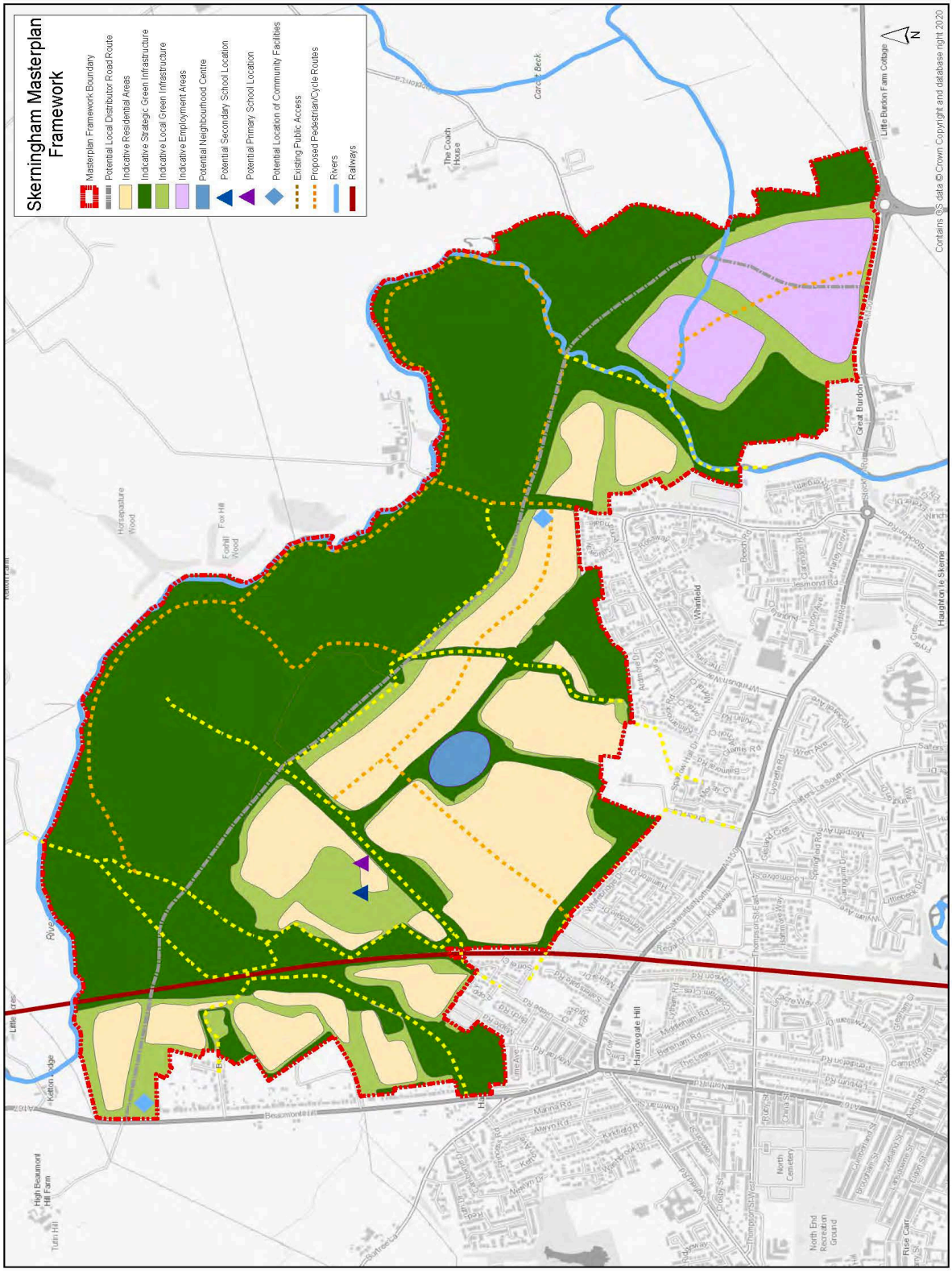
Figure 6.1 Skerningham Masterplan Framework




Skerningham Allocation
Masterplan Framework
Masterplan Framework Boundary
Potential Local Distributor Road Route
Indicative Residential Areas
Indicative Strategic Green Infrastructure
Indicative Local Green Infrastructure
Indicative Employment Areas
Potential Neighbourhood Centre
Potential Secondary School Location
Potential Primary School Location
Potential Location of Community Facilities
Existing Public Access
Proposed Pedestrian/Cycle Routes
Rivers
Railways
N
© Crown copyright and database rights 2020 Ordnance Survey 0100023728.
Contains OS data © Crown Copyright and database right 2020
Little Burdon Farm Cottage
Great Burdon
The Coach House
Carcut Beck
Horsepasture Wood
Foxhill Wood
Fox Hill
Little Ketton Farm
Ketton Ridge
High Beaumont Hill Farm
Tutin Hill
Beaumont Hill
Darlington Golf Course
Harrowgate Hill
Whinfield
North Cemetery
North End Recreation Ground

~~**6.9.6** The following masterplan framework illustrates how the key principles for the development of the Skerningham site could be delivered should the Golf Club relocate. This situation is currently considered unlikely but has been included to cover all potential scenario~~

~~Figure 6.2 Skerningham Masterplan Framework with Darlington Golf Club Relocating~~



6.9.7 The Skerningham allocation ~~Garden Village~~ will deliver a high quality, sustainable development based on garden community principles of up to 4,500 new homes on the north side of Darlington. Due to the scale and complexity of this site, and the level of supporting community and physical infrastructure required to support the development, in the order of 1,950 homes are expected to be delivered on this site during the plan period (as set out in the Housing Trajectory at APPENDIX A). This is not regarded as the maximum number of homes that the site could deliver during the plan period, additional homes could be provided subject to a review being undertaken by the Council and developers of all associated infrastructure requirements to ensure the delivery and appropriate phasing of required supporting infrastructure (see Policy H 2). 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 provision and with appropriate mitigation measures, as required, delivered in a coordinated phased manner alongside development. It is expected that 600 homes delivered during the plan period will be located on the land adjacent to the A167 and west of the East Coast Mainline with the remaining 1,350 homes delivered during the plan period on the eastern part of the allocation with initial phases located on land adjoining Barmpton Lane.

6.9.8 The Masterplan Framework~~s~~ shows the potential location of a new neighbourhood centre to serve both new and existing communities in the area through the co-location of community services, local scale retail, food and drink (excluding hot food takeaways) and employment facilities, schools and a health hub for GPs and Dentists. The neighbourhood centre is to be located to coincide with sustainable transport routes and the green infrastructure network. A number of smaller centres providing local community facilities to meet the needs of residential areas will also be provided where required, located along walking, cycling and public transport routes.

6.9.9 An assessment of the likely education requirements for this site by the Council has indicated that the site should make provision for land to accommodate up to two 525 place primary schools, each with a 52-place nursery school, a combined total land requirement of 5.6 hectares. This level of provision would allow sufficient flexibility for future demand. It will also be necessary to reserve 5 hectares of land for a 600-place secondary school. The first primary school is expected to be delivered on land to the east of the East Coast Mainline before the occupation of the 450th dwelling on land to the east of the East Coast Mainline subject to available capacity within existing or other newly created local schools and any further phasing requirements established through the infrastructure phasing plan. The timescales for the phasing of the remaining education provision will be established through the infrastructure phasing plan. ~~and/or the a review of infrastructure requirements prior to the occupation of the 1,650th dwelling.~~

6.9.10 Skerningham ~~Garden Village~~ is also expected to deliver approximately ~~22 ha~~ 13.46ha (gross) 9.42ha (net) of ~~net~~ employment land within the allocation

boundary ~~Site 505~~. This is to be located in the southeastern corner of the allocation ~~garden village~~, close to the A66 Little Burdon roundabout.

6.9.11 Development should seek to reduce the use of car-based travel through thoughtful layout, including the provision of a network of convenient, safe and attractive walking and cycling routes, integrated into and aligned with the green infrastructure network and existing Public Rights of Way, with links to adjacent residential areas and community facilities both on and off the site. The development should also fully explore the potential to extend existing bus services into the site, or provide a new service to serve the site, routed through the proposed neighbourhood centre. Appropriate primary and secondary vehicular access points and routes should be provided that are suitable to accommodate evidence based traffic flows to, from and through the site.

6.9.12 The site will require the delivery of a new local distributor road between the A167 north of Beaumont Hill and the A1150 close to the Little Burdon roundabout. The specification of this road will be determined by the Transport Assessment submitted with a planning application for the site. Whilst the precise details and timetable for implementation of the local distributor road are to be agreed with the Council through the comprehensive masterplan, infrastructure phasing plan and planning applications stages, it is expected, based on the modelling undertaken to date, that the internal distributor road will need to be fully operational prior to the occupation of between the 900th and 1500th dwelling. As such, it may be necessary to forward-fund items of common infrastructure, as sufficient S106 contributions for their delivery may not yet have been collected. In such circumstances, the Council would seek to recoup such forward funding when planning applications for development enabled by and/or benefiting from such infrastructure come forward. The Council would therefore seek retrospective section 106 contributions, at the appropriate contribution rate, in relation to such planning applications, even if they are not made until after the relevant item of infrastructure has been fully completed and/or fully (or partially) funded. As the final costs of the relevant item of infrastructure may not be known at the time a section 106 agreement requiring a contribution towards that infrastructure is entered into, every section 106 agreement would, where appropriate, contain a mechanism for review once the relevant item of infrastructure (or, if more than one, all such items) has been fully paid for and constructed so as to secure payment of additional contributions to cover the costs of the infrastructure.

6.9.13 Any reviewed masterplan must continue to deliver a high quality, landscape led design that responds to, respects, and enhances its landscape and biodiversity context and builds upon the existing local green infrastructure assets in the area providing an attractive green edge to the town. Around 45% of the site area is expected to be retained and enhanced as accessible green infrastructure~~,~~ and managed agricultural land ~~and/or (should the situation arise) the relocated golf club,~~ as part of a wide green corridor on the south side of the River Skerne forming the river valley, and along the East Coast Mainline. In addition, 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. With the golf course ~~club~~

remaining ~~in situ~~ undeveloped, around 55% of the site area is expected to be retained and enhanced as accessible green infrastructure, managed agricultural land and the existing golf club.

6.9.14 The River Skerne that runs along the northern boundary of the Skerningham site is identified in Darlington's Green Infrastructure Strategy as part of an existing and proposed strategic green corridor. 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 impacts of development on biodiversity can be avoided, or failing that adequately mitigated. The River Skerne must be protected and enhanced, with the provision of habitat buffers as part of any development alongside the river to the north east and west. The site is expected to deliver an increase in the area of woodland adjacent to the river~~, to offset any loss resulting from the potential relocation of Darlington Golf Course, and~~ to help meet the site's wider green infrastructure needs. This will take the form of non-farmed areas incorporating habitat creation measures at least 50 metres in depth in order to create viable ecological corridors, providing movement corridors for wildlife within the landscape.

6.9.15 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 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.

6.9.16 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 its overall communal value and significance.

6.9.17 Under the provisions of Policy ENV 1, development proposals on the within the Skerningham allocation~~s~~ 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.

Burtree ~~Garden Village~~ Allocation~~s~~

6.10.1 Burtree Allocation ~~Garden Village~~ (also known as Burtree Garden Village or Greater Faverdale) is a 177.8 hectare ~~development comprising two allocations~~ (Site Reference~~s~~: 185 ~~& 506~~) to the North West of Darlington in the Brinkburn and Faverdale Ward and the Heighington and Coniscliffe Ward. The site is currently in agricultural use and is bordered to the west by the A1(M) and the A68, to in the south by Rotary Way, to the north by Burtree Lane and the east by the operational Bishop Line of the Stockton and Darlington Railway. The western part of the site (120 hectares) was allocated in the 1997 Local Plan as an Employment Reserve site.

6.10.2 The Council approved a design code (Greater Faverdale Design Code Supplementary Planning Document) for the development of Burtree Garden Village on 14th July 2022 which sets out the strategic design requirements that need to be applied in developing a successful scheme for Greater Faverdale. Subsequently, the site developers have prepared a comprehensive masterplan and infrastructure phasing plan, which has regard to the strategic design requirements set out in the Design Code SPD. This Masterplan was agreed by the Council as meeting the requirement of Policy H11 on 13th May 2024. A hybrid application (22/01342/FULE) for Phase 1 of Burtree Garden Village was granted on 31st January 2025.

Policy H 11

Burtree ~~Garden Village~~ - Site Allocation~~s~~ (Strategic Policy)

A site allocation~~s~~ is are identified at Burtree ~~Garden Village~~ (Site Reference~~s~~: 185 ~~& 506~~) to support a mixed use development of approximately 2,000 homes and approximately 19.4ha (gross) or 13.58 ha (net) ~~13 ha (net)~~ of employment land on a 177.8 hectare site in North West Darlington.

Development ~~at~~ within the Burtree allocation ~~Garden Village~~ will be permitted in accordance with the principles set out below and other relevant policies in the Local Plan.

A comprehensive masterplan and infrastructure phasing plan must be maintained that informs the mix of uses, layout, scale, design, provision of local and strategic infrastructure including social and community facilities and phasing of the proposed development, and which incorporates the key principles for the development as set out in points a-j below. Reviews of the Masterplan should be led by the applicant(s), informed by community consultation and should be based on a strong understanding of the characteristics of the site and its surrounds. It should also have regard to the strategic design requirements established in the Greater Faverdale Design Code (or successor document).

To ensure that a cohesive development is delivered at Burtree ~~Garden Village~~, the Council will only approve planning applications that adhere to the agreed comprehensive masterplan, or any updated comprehensive masterplan agreed with the Council, and deliver the necessary local and strategic infrastructure identified in points a-j below, including social and community facilities, at the appropriate phase of the development identified in the infrastructure phasing plan to support the coordinated provision of infrastructure and development.

The key principles for development of the Burtree ~~Garden Village~~ site are shown on the illustrative Masterplan Framework (Figure 6.2), including ~~broad~~ indicative locations for land uses and facilities, which for the avoidance of doubt can be subject to review via agreed updates to the comprehensive masterplan. The site will provide:

a. A mix of housing types, tenures and sizes, including ~~20~~ 30% affordable housing and a ~~proportion of~~ 1% self/custom build housing, informed by up-to-date evidence of the housing needs of the Borough and Policies H 3, H 4 and H 5, with higher densities being incorporated close to public transport routes and the neighbourhood centre;

b. Approximately 13 ha (net) of employment land for E(g), B2 and B8 use classes. This land should be located to the east of the allocation, as shown on the Masterplan Framework (Figure 6.3), unless otherwise agreed with the Council as part of a review of the agreed comprehensive masterplan.;

c. Space for a well located and connected neighbourhood centre providing community facilities, including the potential for a health hub, primary school and local retail and food and drink facilities (excluding hot food takeaways). These should be of a scale and type proportionate to the nature and scale of the development and should be provided at appropriate phases of the development identified in the infrastructure phasing plan. Policies TC1, TC4 and TC5 will not apply to proposals in accordance with these requirements. The requirement and timetable for the provision of the primary school shall be agreed with the Council as part of the comprehensive masterplan, infrastructure phasing plan and any future planning applications for the site subject to the capacity of existing local schools (see Policy IN10);

d. An appropriate buffer zone alongside the A1(M) for noise attenuation which is to be informed by a noise assessment;

e. Principal vehicular accesses from Rotary Way and Burtree Lane;

f. A link road between Rotary Way and Burtree Lane the precise details of which including development access points, together with a timetable for its implementation, shall be agreed with the Council as part of the comprehensive masterplan, infrastructure phasing plan and any future planning applications for the site;

g. Further enhancements to the local road network of Burtree Lane, to include the:

   i. western connection to the A68; and

   ii. improvements to Burtree Lane, including a new or improved pedestrian and cycleway over the Bishop Line to connect the site to the Harrowgate Hill area or improvements to a suitable existing alternative route which would fulfil the same strategic purpose.

   The implementation of these enhancements will be linked to appropriate phases of development with the exact details as agreed with the Council as part of the comprehensive masterplan, infrastructure phasing plan and any future planning applications for the site;

h. Other necessary infrastructure as required by the Infrastructure Delivery Plan and identified at the time of submitting a planning application;

i. An integrated transport network focused on sustainable transport modes; including public transport, walking and cycling with strong links to established networks, adjoining communities, employment locations and Darlington town centre. This should be provided at the appropriate phases of the development identified in the infrastructure phasing plan;

j. A network of connected and good quality green and blue infrastructure, the phasing of which is to be agreed with the Council as part of the comprehensive masterplan and infrastructure phasing plan, that:

   i. retains and enhances the network of safe, attractive and accessible public rights of way, footpaths and cycle routes across the site;

   ii. provides a pattern of well-integrated and inter-connected green spaces (along with their long-term maintenance) across the site providing for the recreational needs of the local community, including nature friendly natural spaces, in accordance with Policies ENV 4, ENV 5 and ENV 9;

   iii. retains and integrates the green corridor along ~~Dene~~ West Beck in accordance with Policy ENV 3;

   iv. protects the amenity of existing residential properties (see Policy DC 3);

   v. retains and enhances hedgerows and trees (see Policy ENV 7);

   vi. mitigates the impact on biodiversity (see Policy ENV 7) and aligns with wider ecological networks beyond site boundaries;

   vii. incorporates sustainable drainage systems (see Policy DC 2); and

   viii. incorporates improved pedestrian access and interpretation alongside the Stockton and Darlington Railway (see Policy ENV 2).

The site design and layout will be required to conserve and, where appropriate, enhance designated and non-designated heritage assets, within and in the vicinity of the site, including their setting in accordance with policies ENV1 and ENV 2 and the recommendations of the Darlington Local Plan Heritage Impact Assessment (2019).

Development should be located outside of areas of flood risk, and should be planned sequentially (Policy DC3), placing the most vulnerable development in the lowest areas of flood risk. Proposals should be supported by a Flood Risk Assessment.

As the development is expected to extend beyond the plan period, in line with national policy infrastructure requirements, the infrastructure phasing plan will be kept under review. Therefore, in advance of the Council approving any application[25] for Phases 2 & 3 of Burtree Garden Village, as currently defined in the agreed masterplan, an updated comprehensive masterplan and infrastructure phasing plan must be agreed by the Council as meeting the requirements of this policy ~~Policy H 11~~.

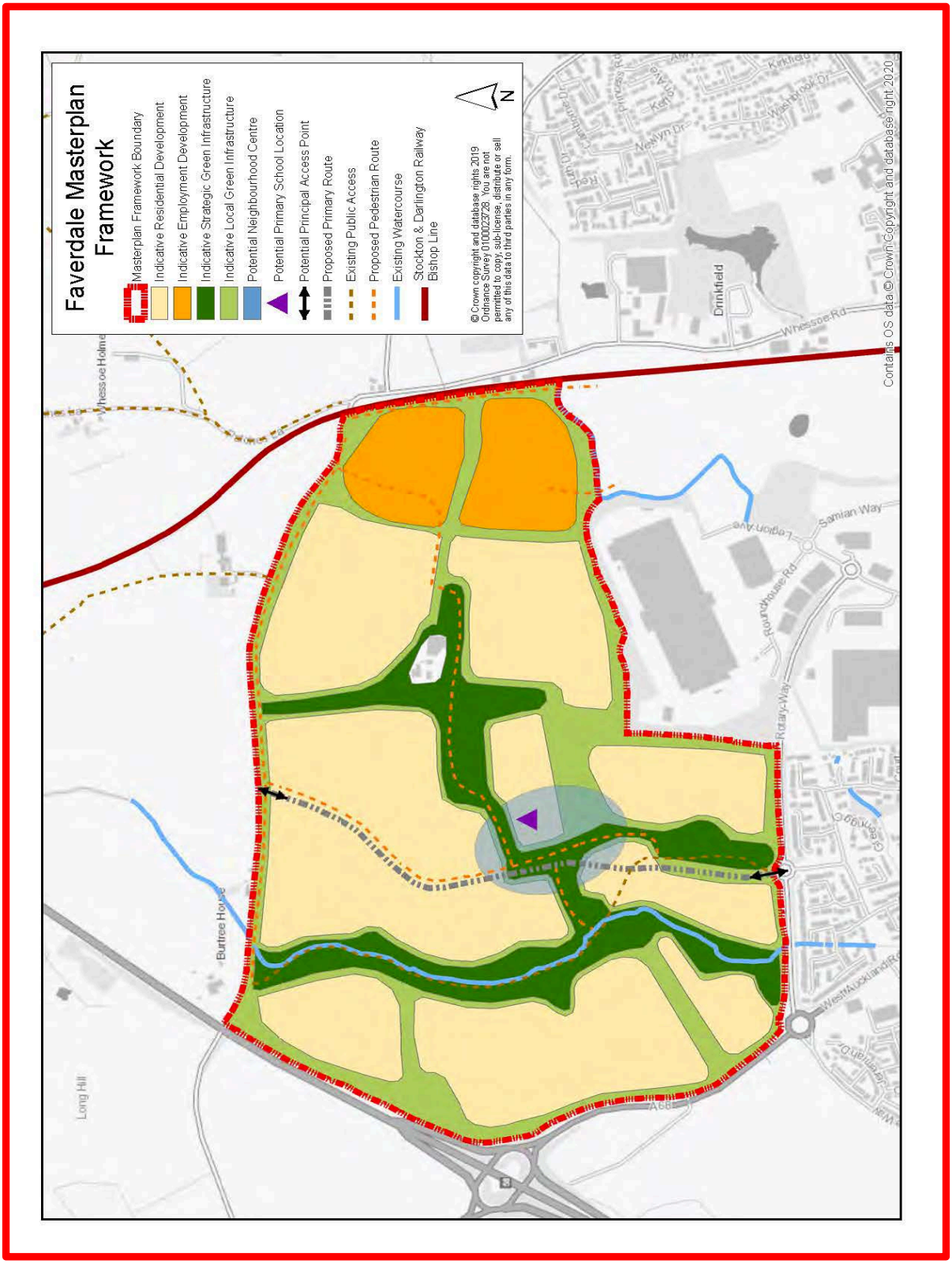
6.10.3 The Burtree ~~Garden Village~~ allocation in the North West of Darlington was identified as having potential for mixed use development as part of the Local Plan Issues and Scoping consultation held in August 2016. The Burtree ~~Garden Village~~ allocation is supported by a Masterplan Framework initially created in January 2018 by the Greater Faverdale Site Group consisting of landowners, developers and consultants. Work on the Masterplanning Framework started in January 2017 and included consultation in September 2017. This work, along with the feedback from consultation, has informed the policy requirements for the Burtree allocation ~~Garden Village~~.

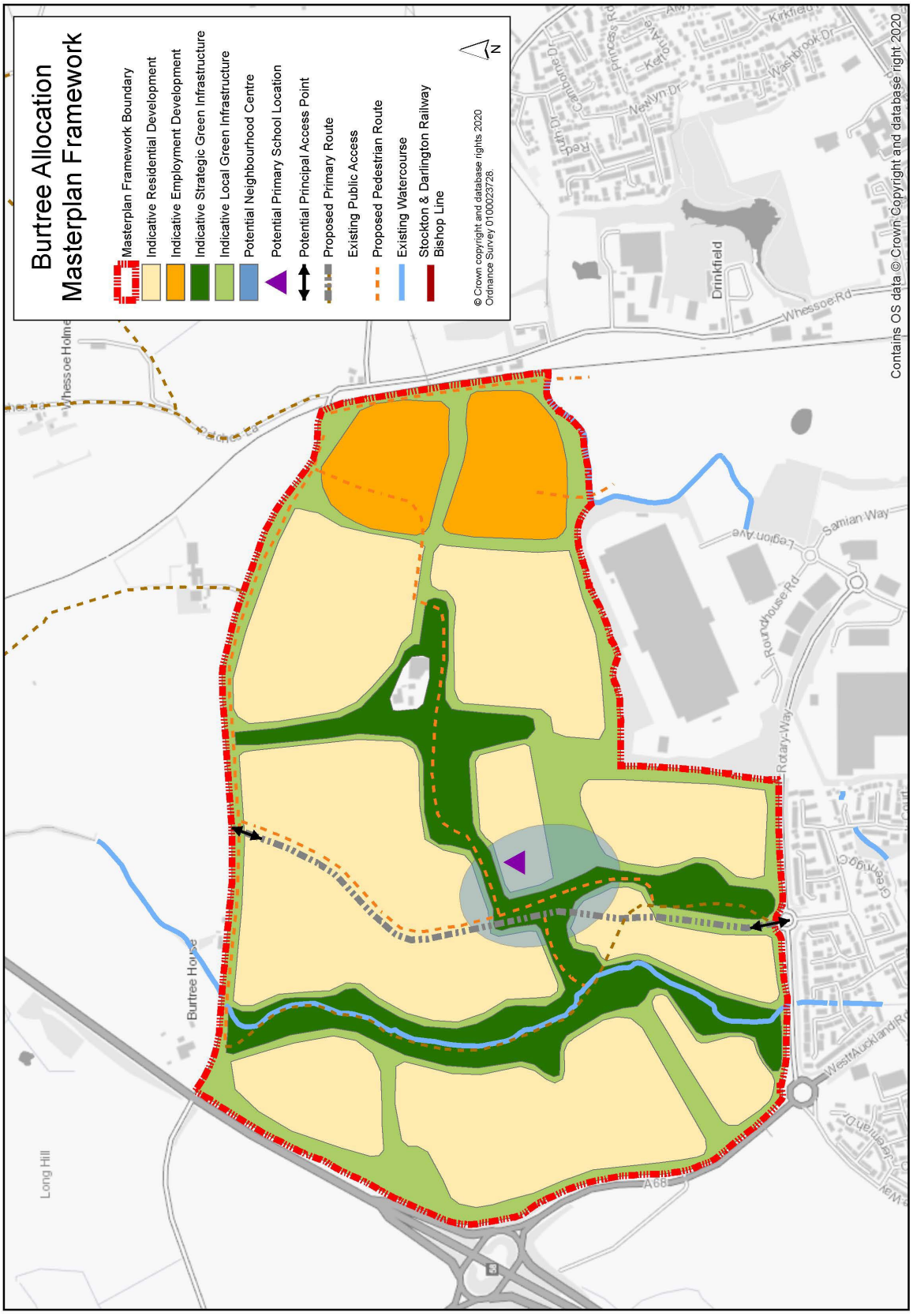
6.10.4 The following Masterplan Framework, which has been updated as part of this review, illustrates the key principles for the development of the Burtree allocation ~~Garden Village~~ which emerged from the initial masterplanning process and are reflected in the policy. The Masterplan Framework suggests a mixed-use development of approximately 2,000 housing units and approximately 19.4ha (gross) or 13.58 ha (net) ~~13 ha (net) of employment land~~. It includes indicative access points, green and blue infrastructure, an indicative neighbourhood centre, a movement network, suggested indicative land uses and essential amenities.

6.10.5 The following Masterplan Framework illustrates the key principles for the development of the Burtree ~~Garden Village~~ allocation emerging from the masterplanning process and reflected in the policy.

[25] Excepting Cell CH for which application 25/00665/FUL has been received by the Council.

Figure 6.3 Greater Faverdale Masterplan Framework




Burtree Allocation
Masterplan Framework
Masterplan Framework Boundary
Indicative Residential Development
Indicative Employment Development
Indicative Strategic Green Infrastructure
Indicative Local Green Infrastructure
Potential Neighbourhood Centre
Potential Primary School Location
Potential Principal Access Point
Proposed Primary Route
Existing Public Access
Proposed Pedestrian Route
Existing Watercourse
Stockton & Darlington Railway
Bishop Line
© Crown copyright and database rights 2020
Ordnance Survey 0100023728.
N
Contains OS data © Crown Copyright and database right 2020
Drinkfield
Whessoe Rd
Samian Way
Legion Ave
Roundhouse Rd
Rotary Way
Burtree House
Long Hill
A68

6.10.7 In time, the comprehensive masterplan agreed with the Council on 13th May 2024 will need to be reviewed to cover delivery of Phases 2 & 3 of Burtree Garden Village. Such a review should continue to have regard to the strategic design requirements established in the Greater Faverdale Design Code SPD and be based on a strong understanding of the characteristics of the site and its surrounds and adopt the Healthy New Town principles to site design. The review will also need to take into account the impact of traffic generation on the local and national highway network.

6.10.8 For this site the balance of residential versus employment space will be dependent on the economic climate and viability assessment of the site.

6.10.9 In line with the recommendations of the Heritage Impact Assessment[26], 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.

6.10.10 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 to conserve and enhance its 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 and Darlington Railway.

Accommodating Travelling Groups

6.8.1 Darlington has a long association with Gypsies and other Travelling groups with people from these groups accommodated on dedicated sites and within general housing. The Darlington Local Plan 2025-42 makes provision for travelling groups at the existing larger council owned sites together with other smaller, often private, sites within the Borough to accommodate for Gypsies and Travelling groups. It also indicates that additional accommodation to meet needs over the plan period should be allocated in accordance with a set of criteria, such criteria also being the basis for making decisions on windfall sites.

6.8.2 The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in the DCLG's August 2015 Planning Policy for Travellers Sites (PPTS).

Existing Sites and Commitments

6.8.3 To provide a robust evidence base for the pitch and plot targets set out in this policy,

[26] Darlington Local Plan Proposed Allocation Sites: Heritage Impact Assessment, Solstice Heritage, 2019.

a Gypsy and Traveller Accommodation Needs Assessment (2025) has been carried out. This has been supplemented with information by the Council's Annual Caravan Count July 2025. Table 6.9 shows existing pitches in Darlington in 2025 [27].

Table 6.9 Existing Gypsy and Traveller Pitches

Pitches	Transit Pitches	Total
152	16	168

6.8.4 Two new sites which are owned by the Council have been provided by the Homes and Communities Agency (HCA now Homes England) through the Traveller Pitch Fund (2011-2015) / Affordable Homes Programme (AHP) (2015-2018) funding. One site, Rowan East, has 16 pitches with amenity blocks and 4 chalet pitches and was completed in March 2015. A further site, formerly known as Neasham Road, was completely regenerated and upgraded in 2017 to a size of 22 pitches, all with enlarged amenity blocks. The standard of accommodation is of the highest standard and have been used as a 'quality of design demonstrator project' by the HCA in England for Gypsy and Travellers Sites based on the new caravan licence standard from 2014.

Gypsy and Traveller Accommodation Needs Assessment (GTAA) 2025

6.8.5 The most recent Gypsy and Traveller Site Needs Assessment (GTAA 2025) [28] came to the conclusion that Darlington Borough is well catered for in terms of supply for Gypsy and Traveller pitches. An annual need of 1.8 pitch per 5 years was identified from 2025-2029.

6.8.6 Further need arises for residential pitches in the period of 2030-2042 which has been calculated on a projection basis of 37 pitches, an annualised need of 2.8 pitches.

6.8.7 No need for Travelling Showpeople plots has been identified in the Local Plan Period until 2042.

[27] GTAA December 2025 / DBC Annual Caravan Count July 2025.

[28] By ORS Consultants December 2025

Policy H 12

Gypsy and Traveller Accommodation (Strategic Policy)

The council will seek to address the Gypsy and Traveller accommodation needs over the Plan period, as identified in the Gypsy and Traveller Accommodation Needs Assessment by:

e. Safeguarding of existing larger Gypsy and Travellers Sites (20 pitches plus);

f. Safeguarding of private dedicated smaller Gypsy and Travellers sites, and;

g. The extension to existing Council sites at Honeypot Lane (8 anticipated pitches) and an extension to the Rowan West / East complex site (25 anticipated pitches) off Neasham Road, and;

h. Allowing new sites to provide accommodation for Gypsies, Travellers and/or Travelling Showpeople where:

i. the site is clearly demarcated with pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area;

ii. the site allows satisfactory access to local schools and other amenities;

vii. the site design takes account of the needs of residents, and provides an appropriate pitch layout and adequate facilities for parking, storage, play and, if required, grazing space for livestock;

viii. there is safe access for pedestrians, cyclists and vehicles, including for turning and parking, vehicles towing caravans, emergency services and servicing requirements, including waste collection;

ix. all necessary utilities can be provided on the site including mains water, electricity supply, drainage, sanitation and provision for the screened storage and collection of refuse, including recyclable materials; and

x. the proposal would avoid any unacceptable adverse impact on the amenity, health or living conditions of neighbouring residents or any other neighbouring uses, including as a result of flood risk, excessive noise, dust, odour, lighting, traffic generation, the keeping of livestock or other activities.

6.8.8 The three existing larger council owned sites at Honeypot Lane and Rowan East & West will continue to be safeguarded to provide for accommodation needs. A range of existing private dedicated smaller sites will complement these and be safeguarded for use as Gypsy and Traveller sites, for up to the number of pitches currently authorised and licensed.

6.8.9 In addition, there are a significant number of unimplemented planning permissions for Gypsy and Traveller sites within the Borough, all on private land, providing for small family units. These are anticipated to meet some of the need for additional pitches and for the five-year supply of pitches. These pitches are spread throughout the Borough, with some concentrations in the Hurworth Moor and North of Brafferton area.

Together, they make a considerable contribution to a particular need of some Gypsies and Travellers to own their own site. As some of these planning permissions are not for specific families, there is a potential that some will be let to families who wish to live on a smaller site, but who cannot afford to buy their own site.

6.8.10 National policy indicates that Local Planning Authorities can make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Local evidence over the last 25 years supports making an allowance for 4 pitches per year coming forward as windfalls.

7. EMPLOYMENT FOR ECONOMIC GROWTH

Promoting New and Retaining Employment Opportunities

7.1.1 The Local Plan suggests where and how a continuous and diverse supply of employment land will be provided within the Borough to meet the needs of existing and future economic development. It plans for up to ~~94 hectares~~ 82 hectares (ha) of land allocations for employment land across the Borough in the period up to 2042. The current land available plus the allocations provides gross available employment land in the Borough of ~~245 ha~~ 227.ha. That translates to a net available plot portfolio of ~~168 ha~~ 155ha developable for employment use for the Local Plan Period 2025-42.

Table 7.1 Employment Land Availability

	Total Employment Land	**Gross Available ha**	**Net Available ha[29]**
Existing Employment Opportunities	~~**598.15 ha**~~ **597.48ha**	~~111.02ha~~ **110.36ha**	~~73.79 ha~~ **73.33ha**
Employment Allocations	~~187.38ha~~ 116.68ha	~~134.13ha~~ 116.68ha	~~93.89ha~~ 81.67ha
Total	~~**785.53ha**~~ **714.16ha**	~~**245.15ha**~~ **227.04ha**	~~**167.68ha**~~ **155ha**

7.1.2 National planning policy says that employment sites should not be protected over the long term if there is no reasonable prospect of them being used for that purpose. It also indicates that where this is the case, planning applications for alternative uses should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities.

7.1.3 In advance of the Local Plan, two Employment Land Reviews (2012 and 2017) have been carried out which supplements the evidence in the Darlington Borough Council Economic Strategy 2012- 2026.

7.1.4 Since the recession of 2007-2013 Darlington is again experiencing substantial new jobs growth, with the number of residents employed returning to pre-

[29] 70% of gross area (accounting for internal roads, car parks, verges, green space, utilities etc.)

recession levels. Current strong employment sectors include business services, subsea, public administration, education and health services, manufacturing, advanced engineering and logistics. Further growth is forecast in these areas and in a number of emerging sectors including digital and media, biologics, telehealth and healthcare. The Local Plan makes an allowance for ~~7,000~~ 6400 (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 [30].

7.1.5 Whilst the area's office stock has been enhanced by a number of recent developments such as Business Central, Innovation Central, Feethams House, Darlington Economic Campus and the Bishopsgate Department for Education building, the town still remains a secondary office location on a regional level behind Newcastle and Leeds.

7.1.6 The Employment Land Reviews and Economic Strategy suggests that:

- Embedding major 'footloose' businesses within the local economy should remain a key priority;
- About ~~94 ha~~ 82ha of employment land should be allocated by the Local Plan;
- Land next to the main highway and rail infrastructure should be protected to support development within the advanced manufacturing and subsea sectors for Darlington; and
- More high-quality Grade A office premises of 20-50 sqm size and larger move-on space is needed in the Borough's main industrial estates, either a new build development or subdivision and refurbishment of larger, older buildings.

7.1.7 National initiatives such as the Industrial Strategy have been introduced to support employment growth and a strategy will be developed for the Tees Valley and Darlington in the next few years.

7.1.8 Additional evidence and recent developments suggest further economic growth potential for Darlington:

- ~~The creation of the~~ Tees Valley Combined Authority (TVCA) provides enhanced public investment for key infrastructure for employment sites such as the Tees Valley Enterprise Zone in Central Park South;
- Developed by public and private sector partners, the updated Tees Valley Strategic Economic Plan (SEP) 2016 and the Tees Valley Growth Plan July 2026 sets out the ambition and priorities for generating economic growth through transformational change in the Tees Valley, with a target of achieving a net increase of 25,000 new jobs by 2026.
- Employment land and flexible premises offers are required to support and accommodate this growth. "Grow on" industrial space for existing

[30] As justified in the Evidence paper for Darlington Future Employment Land Needs ~~Report September 2017~~ September 2026

businesses, high quality office space and additional space for key growth sectors such as advanced manufacturing, biologics and logistics will be essential.

- In 2015 the TVCA (as the former Tees Valley Unlimited) researched the needs of the large scale logistics markets to better understand how large scale sites would enhance the Tees Valley's share in the sector. Sites such as those at Burtree ~~Garden Village~~ and Symmetry Park have been identified for Darlington as key employment sites to support the sector. A Darlington Borough Council Local Logistics Sector Study 2015 confirmed the locational advantages of those sites.

- There is new interest in certain sites, and interest from a number of companies for land and premises within the Borough. ~~Local Growth Fund bids via TVCA have been submitted for key employment sites such as Burtree Garden Village to reflect current employment interest in the site.~~

Policy E 1

Safeguarding Existing Employment Opportunities (Strategic Policy)

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 on available land and for the change of use of existing buildings or developed land (subject to any permitted development rights) in line with the 'suggested uses' of each site set out 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 a detrimental effect on the amenities of the occupiers of adjoining or nearby properties or prejudice the development of adjacent sites.

The Council will consider the use of planning conditions for applications which are for offices, research and development or light industrial uses (Use Class E(g)) to ensure that they remain in that use in perpetuity.

Table 7.2 Existing Employment Opportunities

Site Ref	Name	Total Site	Gross Available	Net Available	Suggested Use
80	East of Lingfield Point	10.42 ha	0ha	0ha	B2 B8, E(g)
343	Faverdale Industrial Estate	115.75ha	30.89ha	21.62ha	B2, B8, E(g)
346	Meynell Road West	8.5 ha	0 ha	0 ha	B2, E(g)
347	Cleveland Industrial Estate	14.6 ha	0 ha	0 ha	B2, B8, E(g)
348	Red Barnes Way	3.03 ha	0 ha	0 ha	B2, B8, E(g)
393	Darlington Farmers Auction Mart	78.11ha	45.5ha	31.85ha	B2, B8 E(a b c g)

352	Barton Street/Haughton Road	1.24 ha	0 ha	0 ha	B2 E(g), Sui Generis
353	Haughton Road/ Blackett Road	11.58 ha	0 ha	0 ha	B2, B8, E(g)
354	McMullen Road East	2.72 ha	0 ha	0 ha	Sui Generis
355	Lingfield Point	33.58 ha	2.74 ha	1.92 ha	B2 B8, E(g)
357	Morton Park	18.28 ha	5.79 ha	4.05 ha	B2, B8, E(g)
358	Yarm Road Industrial Estate	63.86 ha	0	~~0~~	B2, B8, E(g) , Sui Generis
359	Morton Palms Business Park	~~7.97 ha~~ 7,37ha	~~4.6ha~~ 4.0ha	~~3.22 ha~~ ~~2.8ha~~	B2, E(g)
363	Aycliffe	15.33 ha	0 ha	0 ha	B2
364	Yarm Road South	~~45.65ha~~ 45.58 ha	~~10.66ha~~ 10.60ha	~~7.46ha~~ 7.42ha	B2, B8 E(g)
366	Meynell Road East	10.28 ha	0 ha	0 ha	B2 , B8, E(g)
367	Symmetry Park	36.03 ha	13.10 ha	9.17 ha	B2, B8, E(g)
368	Central Park South	9.84 ha	5.24 ha	3.67ha	B2 , E(g) . ,F1
376	Whessoe Road	4.88 ha	0 ha	0 ha	B2, E(g)
378	Longfield Road	2.41 ha	0 ha	0 ha	B2
379	Banks Road	9.70 ha	0 ha	0 ha	B2, E(g), Sui Generis
380	Albert Hill Industrial Estate	16.02 ha	0 ha	0 ha	B2, B8, E(g)
404	Teesside International Airport North	68.47ha	0 ha	0 ha	B2, E(g) and Airport related uses
409	Drinkfield Industrial Estate	13.51 ha	0 ha	0 ha	B2, E(g)
	TOTAL	**~~598.15 ha~~ 597.48ha**	**~~111.02 ha~~ 110.36ha**	**~~73.79 ha~~ 73.33ha**	

7.1.9 The Employment Land Review (2013 and 2017) recommendations have been balanced against other considerations, such as the momentum that could be generated by more recent interest and initiatives and the need to have a range and choice of sites, the Borough's aspirations for economic growth and the suitability of sites for other uses.

7.1.10 Policy E 1 therefore recognises that there is still a reasonable prospect of employment uses being delivered on sites previously allocated. Their

safeguarding / retention will ensure that a range and choice of employment land is available to meet all user requirements over the plan period.

Policy E 2

Employment Allocations (Strategic Policy)

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 set out 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 a detrimental effect on the amenities of the occupiers of adjoining or nearby properties or prejudice the development of adjacent sites.

The Council will consider the use of planning conditions for applications which are for offices, research and development or light industrial uses (Use Class E(g)) to ensure that they remain in that use in perpetuity.

Site Ref	Site Name	Total Site	Gross Available	Net Available	Suggested Use
506	Burtree Garden Village Employment	~~18.74ha~~ 19.40ha	~~18.74ha~~ 19.40ha for Employment	~~13.12 ha~~ 13,58ha for Employment	B2, B8, E(g),
505	Skerningham Garden Village Employment	~~84.82ha~~ 13.46 ha	~~31.57ha (less than 40% of site *due to terrain infrastructure restrictions and preservation as per Masterplan)~~ 13.46ha	~~22.1 ha~~ ~~9.42ha~~	B2 B8 E(g),
360	Heighington Lane North	5.70 ha	5.70 ha	3.99 ha	B2, B8, E(g)
474	East Street	1.25ha	1.25 ha	0.87ha	E(g)
362	Teesside International Airport South	39.3 ha	39.3 ha	27.51ha	B2, B8, E(g) & Airport related uses
433	Burtree Employment Park	37.57ha	37.57ha	26.30ha	B2 B8 E(g)
	TOTAL	~~**187.38ha**~~ **116.68ha**	~~**134.13 ha**~~ **116.68ha**	~~**93.89ha**~~ **81.67ha**	

7.1.11 Due to the amount of vacant and undeveloped sites within the existing portfolio of employment sites only 6 sites will be allocated through the Local Plan. Those sites are identified as key strategically placed employment sites which will be used to attract high value sector growth to Darlington.

7.1.12 Three sites have been identified through the Housing Employment Land Availability Assessment (HELAA, 2025) of being able to cater for additional employment development opportunities due to their specific characteristics and locational factors. These are East Street; Burtree Employment Park and Skerningham Garden Village Employment sites.

7.1.13 The Local Plan also recognises the contribution that alternative uses can make to employment areas, where they comply with the objectives of the plan and are applied consistently, and can help to realise the development of employment uses, and the continued retention and attractiveness of employment sites. Acceptable uses are predominantly those that have a similar character to employment uses, but may not be in the same use class, and could include training centres related to employment in the industries on the estates or a particular occupier. Ancillary uses include small cafes or nurseries serving the employees of the industrial area, or more diverse uses where they relate to the function of the estate or the surrounding area.

Economic Development in the Rural Area

7.2.1 The Rural area for Darlington is the open countryside outside the Urban Settlement Limit including the Service Villages, Rural Villages and Hamlets.

7.2.2 Supporting economic growth in rural Darlington can mean accommodating acceptable farm diversification schemes, including developments like equestrian centres or livery yards, tourist accommodation (including static caravans, touring caravans and chalet-type accommodation), leisure uses, food and drink, small scale office space, restoration or arts and crafts businesses.

Economic Development in the Open Countryside

7.2.3 To safeguard the intrinsic character of rural Darlington, development associated with such uses (as set out in Policy E 3) should be appropriate in a rural setting and minimise its impact on its surroundings. For caravan sites and tourist accommodation this means compact and unobtrusive sites making use of natural or enhanced screening wherever possible, provided by trees and landscaping, and making use of any existing buildings where possible. Touring caravan and camping sites, although mainly involving temporary structures, should also be screened as much as possible by existing or enhanced landscaping, with any associated facilities and new buildings kept to a minimum, by making use of existing buildings where practicable.

7.2.4 Retail uses in rural Darlington can help support the rural economy. Appropriate forms of retailing in the countryside are those required to support the primary agricultural holding or rural development use which could include the supply of agricultural supplies or machinery. Other goods or produce not for agricultural

purposes should either have been produced on site or sourced from within the locality or should be ancillary to the primary activity on site. An example would be a shop selling fishing tackle and equipment at an established fishing venue.

Policy E 3

Economic Development in the Open Countryside (Strategic Policy)

Proposals for the sustainable growth and expansion of all types of businesses located in the open countryside including the development and diversification of agricultural and other land-based rural businesses will be supported where:

a) They enable the conversion or re-use of existing building(s), providing the buildings are:

   i. sympathetic to their surroundings or can be made so, without significant demolition or rebuilding, and;
   ii. remain in keeping with their surroundings and make use of retained features that contribute to local distinctiveness and historic interest if appropriate;
   iii. capable and large enough for conversion without significant alteration and the need for additional buildings. Substantial extensions will not be permitted and any extensions that are required must be subordinate in scale and proportion to the original building.

b) New buildings are well designed and, wherever possible, are physically well-related to existing rural settlements and/or existing buildings and building groups. The character, scale and design of all proposed new buildings must be appropriate to its open countryside surroundings.

All proposals should be sensitive to their surroundings, provide satisfactory access from and not have an unacceptable impact on the local road network. Proposals must also not unacceptably affect amenity, not prejudice any viable agricultural operations on an active farm unit, and 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 which make a location more sustainable will be supported.

A) If the proposals are for equestrian related development then, in addition:

i. There must be adequate land for commercial uses, adequate off-road riding facilities available safely nearby that is proportionate to the number of horses to be kept on the land and located where there is, or could be, ready and safe access to the bridleway network; and
ii. Any buildings required should be commensurate in size with the number of horses to be kept on the land and the amount of land available for use by those horses; and
iii. An agreed comprehensive scheme of management for any ancillary development including hard standing, access roads, parking, fencing, lighting, storage, waste disposal, ménages and the subdivision of fields will be required; and
iv. 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.

B) If the proposals are for tourist accommodation then, in addition:

i. New static and touring caravan sites, camping sites and chalet type accommodation or extensions to existing sites of this nature 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~~ highway and footpath network and will be subject to conditions to prevent the permanent occupancy of the site.

ii. Other tourist accommodation should be located within development limits unless it can be demonstrated that the need is not met by existing facilities in Service Villages and villages with settlement limits.

C) Proposals for outdoor leisure uses will also be supported in appropriate locations, provided that their impact on the open countryside is minimised and they provide satisfactory access arrangements and protect amenity.

D) If proposals are for the establishment or expansion of main town centre use development outside of development limits then, in addition, it should be demonstrated that:

i. The proposal is connected to or adjacent to the primary agricultural holding or existing rural business;
ii. The proposal is economically related to the primary agricultural holding or existing rural business and is ancillary to the primary existing use; and
iii. For proposals over 500 sqm the sequential approach (Policy TC1) has been applied and for retail use there would be no significant adverse impact on the vitality or viability of retail centres (policies TC1 and TC5); and
iv. The proposal will not affect the retention of local services and community services including village shop, and public houses.

7.2.5 Proposals requiring significant vehicle movements to deliver or distribute goods will be required to demonstrate that they will not have an unacceptable impact on the safe operation of the public highway. Proposals that do need significant traffic generation to operate would likely be better located in a more established and accessible location. Applicants will be required to demonstrate with supporting information how the proposal meets this requirement.

7.2.6 Developments in the open countryside also need to be sited to get the benefit of the open countryside location and should not adversely affect existing agricultural operations. Equestrian developments, for example should be located where there is, or could be, ready and safe access to the bridleway network and any developments should not limit the future viability or sever any existing farm holding to an extent where its viability is adversely affected.

8. TOWN CENTRE AND RETAIL

Darlington Town Centre

8.1.1 National planning policy indicates that the Council should pro-actively promote competitive Town Centre environments that provide consumer choice and a diverse retail offer. The Local Plan sets out the overall approach to town centres and retailing, to ensure the vitality and viability of the Town Centre is maintained and identifies opportunities to enhance the offer and continued provision of a range of retail, leisure and business uses. Darlington Town Centres role as the Sub-Regional Centre for the western part of the Tees Valley and neighbouring parts of North Yorkshire and South and West Durham, is protected and promoted, including its role as a market town.

8.1.2 The Local Plan sets out the hierarchy of centres in the Borough, defining the role and appropriate developments for each, to ensure that their function in providing food shopping and a range of local shops, leisure uses and services, is safeguarded and enhanced.

Table 8.1 Hierarchy of Centres in Darlington

Sub-regional Centre	i.e. Darlington Town Centre	> 100.000 sqm floorspace
District Centre	i.e. Cockerton	> 10.000 sqm floorspace
Local Centre	i.e. Mowden	1.000 sqm floorspace

8.1.3 The Local Plan seeks to focus retail activity within the Town, District and Local Centres in the Borough, and to avoid developments outside of these centres that would compromise their vitality and viability by drawing significant amounts of trade away from them. This policy does not prevent the development of small shops or convenience stores that serve local needs but does help to ensure that development within centres is consistent with a centre's scale, function and physical capacity to integrate extensions. Adverse impact on vitality and viability could result in local services and amenities not being available and accessible to local communities. It could mean that people with restricted mobility will lose services and others will have to travel further.

8.1.4 The Local Plan defines the extent of Darlington Town Centre, the Primary Shopping Area (defined on the Policies Map) and the District and Local Centres. This is important as it identifies where Town Centre uses will be acceptable, and when a sequential assessment will be required.

8.1.5 The Town Centre is the defined area where main Town Centre uses will be located. Main town centre uses[31] are retail development (including warehouse clubs and factory outlet centres); leisure, entertainment, and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices, and arts,

[31] as defined in NPPF

culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). Strengthening the town centre by channelling new main town centre uses is vital if Darlington is going to fulfil its role as a Sub-Regional Centre. The definition of the Town Centre has been tested and approved by two Town Centre Conference events in 2015 and 2017.

8.1.6 On appropriate sites, the Local Plan supports the change of use to residential within the Town Centre Boundary. Permitted Development Rights (PDR) and a flexible approach to changes of use [32] will enable residential development in the Town Centre to ensure its continued vitality and enhance vibrancy.

Policy TC 1

Darlington Town Centre (Strategic Policy)

Proposals for main Town Centre uses should be located within the Town Centre Boundary identified on the Policies Map.

Where main town centre uses are proposed outside of the Town Centre boundary a sequential test should be applied in accordance with national policy.

8.1.7 The Town Centre boundary is shown in the policies map and includes south of St Augustine's Way (A68), south of Northgate Roundabout and St Cuthbert's Way (A167) to the north, Bondgate, Skinnergate and Coniscliffe Road to the west and is bounded by St Cuthbert's Way (A167) to the east and Grange Road / Victoria Road (A167) to the south.

Primary Shopping Area

8.1.8 The Primary Shopping Area (PSA) is defined as the area within the Town Centre where retail development, the main contributor to vitality and viability, is concentrated and should be densely focused. It covers all shopping frontages with the Town Centre.

8.1.9 There is a need for flexibility due to 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.

[32] As recommended by paragraph 90 f) of the NPPF (December 2024)

Policy TC 2

Primary Shopping Area

The Policies Map defines the Primary Shopping Area within the Town Centre.

To maintain vitality and viability, the Local Planning Authority will permit non-retail uses in shopping frontages where appropriate, subject to:

a. Its position and attractiveness within the frontage; and

b. The relative pedestrian flow associated with the unit compared with the wider centre.

Comparison and Food Retail Need

8.1.10 The Darlington Retail and Town Centre Study Update 2017[33] indicates that there is currently no significant quantitative need for additional convenience retail development but that there would be a need for comparison goods between 2,700 sqm and 15,800 sqm from 2027 - 2032. By 2036 the comparison goods need could increase to 9,300 sqm - 26,200 sqm in total. It is likely that this will be provided through several smaller developments throughout the plan period. Additional large-scale food retail development is not being planned for at this time. There may be a qualitative need for additional foodstore provision in new strategic site allocations but this will be addressed through the planning application process.

Commercial Street Site

8.1.11 Land at Commercial Street (circa 1.5ha), currently used as a car parking area, has been identified as a sequentially preferable location to provide for the comprehensive regeneration of a central location. It is envisaged that the site would significantly improve and re-shape the retail and cultural offer for the wider Town Centre.

8.1.12 The delivery of a regeneration scheme will be critical in enhancing Darlington's role as a Sub-Regional centre, as identified within Policy TC 1 of the Draft Local Plan, meeting the quantitative and qualitative retail needs of Darlington and the wider Borough.

8.1.13 The Commercial site should be brought forward through a comprehensive approach for the area. This approach can involve a positive mixture of uses including retail, cultural and residential uses, supplemented by leisure, employment and educational uses that will complement the existing centre and form part of a sustainable extension to Darlington Town Centre.

[33] White Young Green, November 2017.

Policy TC 3

Additional Site for Town Centre Uses

In order to meet any future need for Town Centre Uses the following site is shown on the Policies Map as a potential Town Centre Extension Site:

Table 8.2 Additional Site for Town Centre Uses

Site Name	Size
Commercial Street	1.5ha

The Council will support the regeneration of the Commercial Street site which could be residential led providing the following matters have been addressed:

a. Ensuring sensitive integration of new buildings with old, seeking where possible to incorporate the existing historic fabric and retaining buildings that are of historic importance, and taking account of the key recommendations of the Darlington Local Plan Heritage Impact Assessment (2019);

b. Development proposals must be of a high standard of design that are sympathetic and appropriate to the local area and makes use of local design styles and local materials;

c. That any comparison and convenience retail element of the scheme are central and complementary to the wider regeneration of the Town Centre;

d. Sufficient and appropriate provision is made for replacement vehicle parking, which minimizes surface car parking, to support the proposed development;

e. Development should incorporate suitable linkages to the existing transport network and help mitigate issues of potential traffic congestion;

f. Development proposals should utilise its frontage with St Cuthbert's Way to provide opportunities for innovative design and improved public realm.

8.1.14 Additional space to accommodate the expansion of Town Centre and Retail uses could be contained in this identified area which is currently made up of expansive ground level car parking areas. It would give the chance for investors to increase Darlington's market share in Town Centre Uses. The area has been previously identified by the Town Centre Fringe Masterplan (2013) and recommended in the Retail and Town Centre Studies (2014 and 2017). The Commercial Street site remains the sequentially preferable location to accommodate a comparison-led retail development within the town.

8.1.15 The Commercial Street site involves the regeneration of land and buildings to the North of Darlington Town Centre. Development proposals for this site should be underpinned by a masterplanning exercise for this site to reflect feasibility, place making ambitions and sustainable development. Developers and agents for this site will be expected to work with the Borough Council.

8.1.16 The regeneration of the Commercial Street site provides an excellent opportunity to address some of the accessibility issues within Darlington Town Centre. It is important that the regeneration of the site which could be residential led recognises the opportunities set out in the Town Centre Fringe Masterplan, particularly in relation to traffic improvements in Darlington Town Centre and the wider improvements to the cycling and walking network. The site-specific Masterplan needs to take account of including these improvements.

8.1.17 The regeneration of the Commercial Street site presents a significant opportunity for a generational change to Darlington Town Centre. However, it is important that regeneration of this area benefits the whole of the Town Centre to ensure that businesses and operators also benefit from the significant growth that this regeneration offers. The Council will seek to promote improvement throughout the Town Centre through the new Town Centre Strategy 2019-30 (which is currently under review). The strategy sets out a positive and proactive approach towards regeneration, improvement and renewal, ensuring that the benefits (in terms of investment and footfall) arising from a scheme in Commercial Street are shared over the wider Town Centre.

8.1.18 Development proposals should take their cue from the historic grain of development within the site, with the design, scale and density of development reflecting the distinct characters of the Northgate and Town Centre Conservation Areas. Development proposals will need to consider an appropriate programme of targeted archaeological evaluation and mitigation prior to redevelopment.

District and Local Centres

8.2.1 The District and Local Centres are important in meeting local needs, providing food shopping and a range of other local shops, services and leisure uses. They are both accessible and help reduce the need to travel. These centres are generally healthy with exceptionally low vacancy rates.

8.2.2 National planning policy indicates that policies should guard against the unnecessary loss of valued facilities and services where this would reduce the community's ability to meet its day-to-day needs and ensure that established shops and services are able to develop and modernise in a way that is sustainable so they are retained for the benefit of the community.

Policy TC 4

District and Local Centres

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 of these centres include shops, financial services, restaurants and cafes, drinking establishments, hot food takeaways, and a range of community and leisure facilities (included within class E(a-f) and sui generis of the Use Classes Order) providing they:

a. Are physically integrated with the rest of the centre; and

b. Will ensure the vitality and viability of the centre is maintained.

Where main town centre uses are proposed outside the district or local centre boundary a sequential test should be undertaken in accordance with national policy.

Development Outside of Existing Centres

8.2.3 The Council's policy is that main Town Centre uses should preferably be located within the existing Town, District and Local Centres. However, where development does take place elsewhere, it is important that it does not undermine existing centres.

8.2.4 Those proposing development of main Town Centre uses that are not in an existing centre should undertake a sequential assessment, to ensure that consideration is given to sequentially preferable locations. This also applies to proposals that are below the local floorspace threshold of 500 sqm set out within the policy. A sequential test is not required for proposals for office development within the identified employment areas or other employment sites identified in this plan and is also not required where the proposal reflects the existing use of the site. Matters to be set out in a sequential assessment are set out in national planning policy and guidance.

Policy TC 5

Retail Impact Assessment Threshold (Strategic Policy)

Proposals for retail (convenience and comparison) and leisure development generating over 500sqm of additional floorspace outside Darlington town centre and which are not identified in the Local Plan policies will be required to undertake an Impact Assessment.

8.2.5 The locally set floorspace threshold of 500 sqm has been set as the requirement for impact assessments to be provided with development proposals, to ensure that the impact of proposals has been properly considered. Any proposals that are above these thresholds and on the edge of or outside of these centres must be accompanied by an impact assessment, to ensure that full consideration is given to the scale of development and any significant impacts that could result from retail proposals, when taken both individually and cumulatively with other proposals and developments. The impact assessment will be expected to be proportionate to the scale of the proposal. The 500 sqm thresholds are set as being broadly the maximum allowance in such locations before the Borough's retail strategy could be compromised. Matters to be considered in an assessment are set out in national planning policy and guidance.

8.2.6 An impact assessment would not need to be undertaken for proposals to create the neighbourhood centres required by policies H10 and H11 at Skerningham ~~Garden Village~~ and Burtree ~~Garden Village~~ where proposals satisfy the requirements established in these policies.

Darlington - Town Centre Fringe

8.3.1 The Town Centre Fringe is a priority location for brownfield development and regeneration within the Borough, and significant development activity started in 2016. The Fringe is an extensive area: over 79 ha of land, buildings and roads, much of which is underused. It contains a mix of employment, residential, retail, leisure, car parking and other uses, and much of the area's housing is occupied by deprived households. The area of the Town Centre Fringe as identified in the Local Plan (2025-2042) is wider than the Council's wider Town Centre Fringe Masterplan area and includes the Northgate Masterplan Area.

8.3.2 The Town Centre Fringe has a lot of advantages for future development - it is easy to get to by several modes of transport, close to the Town Centre, containing key buildings like the Hippodrome and other heritage assets and the River Skerne flows through it. It is also very visible from local roads and the east coast main line. The Bank Top Station Masterplan created in 2016 overlaps with the Town Centre Fringe area but synergies of development will be considered in the current implementation of the Darlington Station upgrade. This also includes synergy with development of the Darlington Economic Campus (DEC) Building at Brunswick Street.

8.3.3 The River Skerne was also identified as a strategic green infrastructure corridor. However, before the potential of the area to contribute much more to the growth, prosperity and quality of life of Darlington can be realised, there are significant issues to overcome, such as managing flood risk, changing the image of the area, tackling contamination and hazard, and improving connectivity across the inner ring road. Considering the area comprehensively provides the best way to ensure that both public and private investment is made effectively and in a timely and co-ordinated manner. Currently work with Homes England, the Environment Agency and the Tees Valley Combined Authority is ongoing to address funding gaps and ownership issues.

Policy TC 6

Darlington - Town Centre Fringe

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. The uses likely to be acceptable include economic, commercial and residential (main town centres use proposals would, where relevant, need to satisfy the sequential approach (Policy TC1) and Impact Assessment (Policy TC5)).

To support the delivery of the remaining priorities identified in the Town Centre Fringe and Northgate Masterplans, development in this area should:

a. Manage flood risk along the whole of the river corridor that avoids most vulnerable development in areas at highest risk of flooding and incorporates enhanced river habitat and green infrastructure within the River Skerne Strategic Green Infrastructure corridor;

b. Conserve historic buildings and where appropriate enhance the historic environment 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.

9. ENVIRONMENT

Safeguarding the Historic Environment

9.1.1 National planning policy[34] 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 Darlington's historic environment comprises heritage assets of varying degrees of significance including buildings, monuments, sites, places, areas and historical landscapes. It is a non-renewable, shared resource, and any loss or harm to it is usually irreversible. Understanding the significance of the heritage assets and the contribution that the setting makes to their significance is essential to guide good decisions about land use change and development affecting them.

9.1.3 Altogether, Darlington's historic environment is of considerable significance not least because of its railway, industrial and Quaker history. The Borough's designated heritage assets[35] include:

- 541 Listed Buildings;
- 19 Scheduled Monuments;
- 18 Conservation Areas; and
- 3 Registered Parks and Gardens

9.1.4 The Borough also contains a wealth of non-designated heritage assets including archaeology that is not scheduled but possibly of equivalent significance. Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by the Council as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets. For Darlington this means all heritage assets excluding our scheduled monuments, listed buildings, registered parks & gardens and conservation areas. Many non-designated heritage assets are likely to be on the ~~Heritage~~ Historic Environment Record held by Durham County Council, so this should be the first point of call for identifying them.

9.1.5 Darlington first appeared in writing in circa 1003 and it appears that it was already

[34] Chapter 16 of the NPPF (December 2024).

[35] Identified on the Historic Environment Record (HER) maintained by Durham County Council's Archaeology Service on behalf of Darlington Borough Council.

a place of importance by the Norman Conquest (1066). The small Anglo-Saxon settlement experienced medieval growth as a result of its position in the Durham bishopric (district under a bishop's control). 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, now a grade I listed landmark building, grew an ecclesiastical complex, with the market place to the west surrounded by narrow burgage plots on three sides and the churchyard to the east. Sometime between 1535-1543 Darlington was described as the best market town in the bishopric outside of Durham. In 1585, a fire destroyed most of the town which soon after was rebuilt within its medieval street pattern. During the eighteenth century as pressure for accommodation increased, the burgage plots were intensively developed, resulting in a maze of alleyways and passage-like streets, known as yards and wynds, that were required for access. By the 1850s there had been little building beyond the confines of the medieval settlement, other than the residences of Darlington's wealthy inhabitants, who had fled the overcrowded and polluted town .

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 and the world's first public railway on which a steam locomotive hauled passengers. It is now regarded as the prototype for all modern railways and parts of the original 26 miles are ~~is~~ the longest continually operating modern railway in the world. This is covered by a standalone policy (see Policy ENV 2) due to its international significance.

9.1.7 Darlington has a particularly significant Quaker history and associated heritage assets. Darlington Quakers played an active part in the government, industry, commerce and consequently had a lot of influence on development in the town during the eighteenth and nineteenth centuries. This included many of Darlington's designated landmark public buildings and manor houses, parks and cemeteries including South Park, the indoor market and clock tower, ~~Crown Street~~ Darlington Library, and the Friends Meeting House. They also contributed freely to a multitude of philanthropic causes, particularly connected with health and education for the poor e.g. drinking fountains, and schools. The value and significance of these heritage assets is recognised, for their contribution to the unique identity of the borough and their potential contribution to tourism. Non-designated heritage assets 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 linked to industries. These include Tees Cottage Pumping Station, the Cummins Engine Factory on Yarm Road, Skerne Bridge and the Goods Shed at North Road. The Cummins Engine Factory, constructed in 1965, being the most contemporary building to be listed.

9.1.9 The Darlington Cultural Strategy [36] 2022-2026 embraces and seeks to promote Darlington's locally distinct heritage assets as a part of its culture for both residents and visitors to enjoy.

9.1.10 The vision for Darlington's Town Centre Fringe and its historic environment is set out in the Conservation Management Plan[37] 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 character of the Borough's rural historic environment and the heritage assets integral to it will also be protected, enhanced and promoted. It contains several characterful rural villages and hamlets. The former being home to a high concentration of listed vernacular cottages and traditional farm buildings and are generally designated as Conservation Areas. This includes Piercebridge, a village, which was built on the grounds of a former Roman Fort, of which remains still survive. Some 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.

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 significance of those elements of the historic environment which contribute positively 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 plot layouts associated with medieval Darlington.
- Evidence of Roman activity such as the fort at Piercebridge.
- The mix of heritage assets 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 traditional farm buildings and rural villages and hamlets, including those along the River Tees.
- The range of its places of worship.

[36] Darlington Cultural Strategy 2022-2026, DBC

[37] A Conservation Management Plan for Darlington Town Centre Fringe, 2010, Archaeo-Environment.

- Key heritage assets encompassing parklands, landscapes, riversides, museums, libraries, art galleries, public art, food and drink, customs and traditions.

Policy ENV 1

Protecting, Enhancing and Promoting Darlington's Historic Environment (Strategic Policy)

A) Designated Heritage Assets

When considering proposals affecting all designated heritage assets (Listed Buildings, Registered Parks and Gardens, Scheduled Monuments and Conservation Areas) or non-designated heritage assets of archaeological interest, demonstrably of equivalent significance to scheduled monuments, great weight will be given to the asset's conservation. Proposals should conserve those elements which contribute to such asset's significance, including any contribution made by their setting in a manner appropriate to their significance irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm. Proposals resulting in less than substantial harm to designated heritage assets will be permitted only where this harm is clearly justified and outweighed by the public benefits of the proposal. Proposals resulting in substantial harm to or total loss of the significance of a designated heritage asset (or an archaeological site of national importance) will only be permitted where this is necessary to achieve substantial public benefits that outweigh the harm or loss, or, all of the following apply:

- the nature of the heritage assets prevents all reasonable uses of the site;
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back in to use

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

In addition to the requirements in part A, proposals affecting a conservation area involving the alteration, extension or change of use of a building or construction of any structure should

preserve and enhance those elements identified in any conservation area appraisal as making a positive contribution to the character and appearance of that area. 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.

Development will not be permitted that would lead to the loss of public or private open spaces within or adjacent to conservation areas where the existing openness makes a positive contribution to the character or appearance of the area or its setting, including landscape and townscape and views into or from the area, unless the public benefit demonstrably outweighs the harm.

The demolition of buildings or structures in a conservation area will not be permitted if:

v. the building makes a positive contribution to the 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.

C) Archaeological Sites

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 a Scheduled Monument.

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) Non-Designated Heritage Assets

In considering applications that directly or indirectly affect non-designated heritage assets a balanced judgement will be taken, having regard to the scale of any harm or loss and the effect of the application on the significance of the heritage asset. Proposals should seek to avoid harm to those features, including setting, which contribute to the significance of a non-designated heritage asset, through measures such as good design and landscaping.

E) 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.

F) 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 consistent with its conservation.

9.1.13 The Council has a statutory duty to protect listed buildings and scheduled ancient monuments. Great weight will be given to the conservation of heritage assets in line with national planning policy[38].

9.1.14 In addition to the Council's statutory obligations regarding the historic environment[39], the Council will:

a. Seek to identify, protect and enhance Darlington's 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;
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 to increase the promotion and understanding of the area's archaeology.

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9.1.15 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 Darlington Cultural Strategy.

9.1.16 A Heritage Impact Assessment has been produced to inform the Local Plan that assesses the suitability of several 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 Burtree ~~Garden Village~~ strategic allocations.

[38] NPPF Paragraph 207 (2024)

[39] Town and Country Planning Act 1990; Planning (Listed Buildings and Conservation Areas) Act 1990; and, Ancient Monuments and Archaeological Area Act 1979

Conservation Areas

9.1.17 In Conservation Areas special attention must be given in all planning decisions to the desirability of preserving or enhancing the character or appearance of that area. 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.

9.1.18 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

9.1.19 The Borough of Darlington is fortunate to have 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, post box, bridge, or telephone kiosk, for example, and not necessarily a building.

9.1.20 Any changes affecting the character of a listed building will require Listed Building Consent. For example, historic fabric such as doors, windows, fireplaces and so on or original/historical layout are important to the character of the building and consent will be required for their alteration, removal or replacement. Applications for Listed Building Consent are dealt with by the Council's Planning Team, alongside application 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

9.1.21 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 should inform any new development and is an important way of adding to the record, particularly in areas of known local historical interest, such as 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.

9.1.22 In line with national planning policy[40], applications for development involving

[40] NPPF Paragraph 207 (December 2024)

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 satisfactory mitigation measures 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.

9.1.23 Outside of the identified Areas of High Archaeological Potential, desk-based assessment and field evaluation (consisting of geophysical survey followed up by targeted trial-trenching) 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

9.1.24 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 three registered sites within Darlington Borough are all Grade II Listed. South Park and West Cemetery are both publicly owned. The Landscape at Cummins Engine Factory is privately owned.

Non-designated Heritage Assets

9.1.25 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

9.1.26 Heritage at Risk includes buildings, structures and sites whose preservation is threatened, often by vacancy or lack of regular repair and maintenance. Historic England maintain a Heritage at Risk Register [41]. 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. 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

[41] Historic England Heritage at Risk Register

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

9.1.27 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 the least impact on its character or appearance and significance. It may be converted to a new use if it can be demonstrated that it will be consistent with its conservation and compatible with the character or appearance, significance and setting of the historical building, or unless it can be clearly demonstrated that there are public benefits which significantly outweigh the harm.

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[42] requires applicants to assess the significance of heritage assets likely to be affected by a proposal including any contribution made by its setting[43] 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

[42] Paragraph 207 of the NPPF (December 2024).

[43] 48 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".

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 affect heritage assets should also be accompanied by a Statement of Significance[44], 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 held by Durham County Council and the ~~National~~ Historic England Archive.

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, Goods Shed and associated Victorian residential terraces and Railway Tavern Public House on Northgate. In addition to designated assets, Westbrook Villas and the Coal Drops to the rear of Westbrook Villas are examples of non-designated assets to be found in the Borough with strong links to the town's railway heritage.

[44] As defined in paragraph 213 b) of the NPPF (December 2024).

Policy ENV 2

Stockton and Darlington Railway (S&DR) (Strategic Policy)

Development proposals that impact on the historic route of the Stockton and Darlington Railway (1825), the Darlington and Croft branch lines, together with their associated physical and archaeological remains, structures, features and setting, will be supported, where they:

a. conserve and enhance elements which contribute to significance, consistent with Policy ENV1;

b. include measures that preserve and enhance any physical remains along the route, include site interpretation and where appropriate reinstate a legible route where those remains no longer exist;

c. do not prejudice the development of the S&DR as a visitor attraction or education resource; and

d. retain and enhance access to, and alongside the route, branch lines, remains, structures, features and their setting and ~~support~~ enable the creation of walking and cycling paths along the route.

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, Northgate and Middleton St George Conservation Area Appraisals, where relevant, 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) has provided a greater understanding of significance through historic area assessments, historic buildings assessments and archaeological investigations. The project has also resulted in an improved sense of place and identity with several assets associated with the Stockton and Darlington Railway removed from the national heritage at risk register. Site-specific regeneration has delivered new uses for historic buildings and boosted the visitor economy around Hopetown. Proposals for development associated with the S&DR must be informed by the research undertaken as part of the Heritage Action Zone, and subsequent planning and conservation documents, adopted by the Council.

9.2.4 The Council, with its partners, has developed further planning and conservation guidance, including Conservation Appraisals for Northgate and Middleton St George, to ensure the protection, enhancement and promotion of this locally distinct and nationally significant heritage asset to coincide with the 2025 bicentenary celebrations.

9.2.5 Following the success of the S&DR bicentenary celebrations, ~~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~~ will need to be enabled by new developments along the route. The route will support ~~for~~ leisure and tourist visits, and ~~as~~ be an education resource. Further information on the route established to date is available at https://sdr-trail-of-discovery.co.uk/home

Local Landscape Character

9.3.1 The National Planning Policy Framework (NPPF) indicates that valued landscapes should be protected and enhanced. The Darlington Local Plan protects and seeks to appropriately enhance the distinctive character of the Borough's natural and historic townscapes and landscapes, including unique features like rural gaps, green wedges, green corridors, historic routes and parklands. However, there are some parts of the inner urban area where landscape or townscape quality could be improved, in particular to better promote Darlington's railway heritage (see Policy ENV 2).

9.3.2 All perform an important role in helping to the keep the permanence of the landscape over the plan period particularly by protecting the Borough's settlement pattern and maintaining the openness between different neighbourhoods, so that each keeps their unique identity. As the Borough continues to grow each feature will in different ways help safeguard the identity of communities, particularly in areas that face growth pressures.

Policy ENV 3

Local Landscape Character (Strategic Policy)

Proposals will be supported where they protect and enhance the character and local distinctiveness of the Borough's Landscape. This should be achieved by:

A) Retaining the openness and green infrastructure functions of:

1. 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; and
2. The green wedges of Cocker Beck/Mowden, Blackwell/Skerne Park and Haughton/Red Hall.

Within these areas, development will only be permitted where it:

i. Protects and enhances the landscape character, setting and identity of the area and for rural gaps specifically maintains the physical separation of settlements and urban areas;
ii. Protects and enhances biodiversity value by promoting protected and priority habitats and species;
iii. Conserves and enhances ~~traditional~~ landscape features including ancient and semi-natural woodland, trees, ~~and~~ hedgerows and watercourses;
iv. Retains and enhances connectivity within the green infrastructure network; and
v. Is ancillary to a green infrastructure use.

or:

vi. The development proposed is for limited infilling on previously developed land, which would not have greater impact on the openness of the landscape than the existing development.

B) Retaining and enhancing the length, continuity, biodiversity, amenity and

heritage value of:

1. The existing green corridors in line with Policy ENV 4; and
2. The historic routes of the ~~Darlington/Middleton St George/A66/A67/ Stockton Corridor~~ Stockton and Darlington Railway, the Former Barnard Castle Trackbed, Salters Lane, Honeypot Lane, Nunnery Lane and Cemetery Lane.

Development that adjoins these corridors and routes should:

i. Positively respond to the landscape setting;
ii. Conserve and enhance traditional landscape features including ancient and semi-natural woodland, trees and hedgerows;
iii. Retain and support their connectivity for people, habitats and wildlife;
iv. Protect and enhance their ecological and heritage value in accordance with Policies ENV 1, ENV 2, and ENV 7; and
v. Incorporate appropriate interpretation for ecological and heritage features.

C) Retaining and improving the special landscape, heritage and ecological qualities of urban and rural parklands at South Park, North Lodge Park, West Cemetery, Blackwell Grange, Rockcliffe Park, Middleton Hall, Walworth Castle, Redworth Hall, Hall Garth, Newbus Grange and Neasham Hall.

D) Protecting the qualities and key sensitivities of the landscape, commensurate with its status, along with traditional natural and built features and important views having regard to the Darlington Landscape Character Assessment (2015) or update.

E) Enhancing the quality of the landscape through the provision or reinstatement of traditional natural and built features where appropriate.

F) Seeking high quality design in areas of low landscape quality in the urban area, to strengthen local character and distinctiveness, having regard to the Darlington Characterisation Study, Darlington Landscape Character Assessment and the Revised Design of New Development SPD, or their subsequent replacement.

9.3.3 Rural gaps have allowed more than one village to develop separately but nearby over time, for many years. Today these relatively small gaps remain important to the rural settlement pattern, to the character and identity of the rural area and to its residents. This policy together with Policy H 7, will protect the rural gaps, conserving the character, openness and links to the wider landscape in order to maintain the attractiveness of the Borough's settlements and their settings.

9.3.4 The three green wedges, identified in the Darlington's Green Infrastructure Strategy, extend to the proposed development limit of the main urban area to ensure that their land uses, landscape components, openness, topography, nature of their urban edges and their relationship and importance to the character of Darlington is protected and appropriately enhanced.

9.3.5 The existing green corridors identified in Darlington's Green Infrastructure Strategy have a unique character that contributes to the identity and setting of adjoining neighbourhoods, such as the River Tees and the former Stockton and Darlington ~~and Stockton~~ Railway corridor. Their length, distinctiveness and width vary (see Policy ENV 4 ~~7~~). A number are also historic routes, that have historically connected nearby towns, villages, hamlets and scattered farms to

the market town of Darlington and provide insights into the past. Some, like Cemetery Lane, have kept much of their original width and features including walls and gateposts, others like Salters Lane have original hedgerows, ditches and banks in places.

9.3.6 Within and adjacent to these routes development should reflect variations in the local landscape character by enhancing local distinctiveness, guided by the Revised Design of New Development SPD and Darlington's Green Infrastructure Strategy, or their replacement. The use of interpretation and public art to provide greater understanding of ecological and heritage features will be supported.

9.3.7 The Borough has eleven historic ornamental parklands. The Local Plan seeks to protect and enhance the integrity and landscape quality of the seven rural parks and four urban parks. Any national and local designated features within their boundaries will be protected through national legislation and national planning guidance (see Policy ENV 1).

9.3.8 The Borough's landscape outside of the main built-up areas is characterised by mostly open, arable farmland with a mix of unique landforms, including ditches and cuts, village greens and in places traditional field patterns, hedgerows and wetlands. These natural and built features all help distinguish different parts of the Borough from one another, and so will be protected through this policy.

9.3.9 There are landscapes and townscapes in the Borough which detract from or do little to positively contribute to the Borough's attractive and distinctive character. If not addressed, these areas can adversely affect the image of the Borough and its attractiveness to businesses and investors. Development in these areas should include environmental quality improvements to restore or enhance the local landscape or townscape and help attract investment to the Borough, informed by the Darlington Characterisation Study, Landscape Character Assessment and the Revised Design of New Development SPD, or their replacement. Within the rural area, natural features such as hedgerows, field margins and wetlands should be re-created where appropriate.

9.3.10 As Darlington's unique environment contributes much to its distinctiveness, and that this is an objective of the Local Plan, the following policy identifies the key elements of the existing townscape and landscape that will be prioritised for protection and enhancement to help safeguard the distinctive environment of the Borough. Together with more specific detailed documents such as the Town Centre Fringe Masterplan, it will also help attract public sector funding and other investment to the Borough.

Green and Blue Infrastructure

9.4.1 Darlington benefits from an extensive green and blue infrastructure network; its multi-functional green spaces, green corridors, rivers and watercourses provide links within the Borough and to the rest of the Tees Valley, Durham and North Yorkshire. In accordance with the National Planning Policy Framework, a landscape scale approach to green infrastructure will be adopted, using and managing land for what it is best suited to. Through investment, management and maintenance across the network, priority projects will be delivered that will make more of the network so that a range of green and blue infrastructure needs are delivered in each local area, and in the Borough, as a whole.

9.4.2 Darlington's Green Infrastructure Strategy facilitates the planning, design and management of the network to meet the environmental, social and economic needs of the community; by supporting recreation, sport and play, walking and cycling, food production, flood storage and sustainable drainage benefits (see Policy DC 3) as well as the biodiversity and geological features that are found within it (see Policy ENV 7). It can also contribute to achieving the appropriate sustainable building standards (see Policy DC 2) required in new developments and enhance amenity for residents (see Policy HC 2).

9.4.3 The Green Infrastructure network in Darlington is made up of numerous public and private green spaces, landscapes and features including:

- Green corridors;
- Green wedges (see Policy ENV3);
- Wildlife friendly green space, including designated wildlife sites [45];
- Informal recreational open space, children's play areas and landscape amenity space;
- Playing pitches and outdoor sports facilities;
- Formal parks, cemeteries and civic spaces;
- Trees, woodland and community woodland;
- Urban fringe;
- Agricultural land;
- Public rights of way and wider countryside access; and
- Open countryside.

[45] In Darlington designated wildlife sites include Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and Local Wildlife Sites (LWS).

Policy ENV 4

Green and Blue Infrastructure (Strategic Policy)

Green and blue infrastructure will be protected, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multi-functional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity. This will be achieved by:

a. Development proposals within, or adjacent to an existing green corridor (as defined on the Policies Map) should conserve and enhance its function, setting, biodiversity, landscape, access and recreational value as appropriate to that location;

b. Development proposals that are crossed by an existing or proposed green corridor (as defined on the Policies Map) should incorporate it into the sites layout and design having regard to green infrastructure functions appropriate to that location;

c. Development proposals affecting a watercourse should, where possible, maintain a 10 metre buffer zone and explore opportunities to re-naturalise, improve fish habitat and watercourse connectivity including the removal and/or modification of barriers and de-culverting.

d. Capitalising on opportunities to enhance and/or create green links between green and blue infrastructure features;

e. Expecting development to protect and improve local water quality wherever possible, taking into account the Northumbria River Basin Management Plan;

f. Working with partners and the community to bring forward priority projects and measures identified in Tees Valley Local Nature Recovery Strategy, Darlington's Green Infrastructure Strategy and the Northumbria River Basin Management Plan;

g. Providing green infrastructure as part of new residential and non-residential developments in line with Policy ENV 5;

h. Refusing planning permission for development that would result in the loss of existing green space[46] unless it can be demonstrated that the loss of the space would not cause significant harm to the character and appearance of the area or to local biodiversity (in line with Policy ENV 7), and one or more of the following criteria are met:

i) there is an identified surplus of that type of green space in the area and that its loss would not adversely affect the recreational needs of residents;

ii) satisfactory replacement green space is provided in a suitable location, accessible to current users and at least equivalent in terms of size, usefulness, attractiveness and quality;

iii) the proposal involves the development of an alternative sports and recreational

[46] For the purpose of Policy ENV 4 criterion G 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 green corridors, but excluding urban fringe, agricultural land, open countryside and private gardens.

provision, the benefits of which clearly outweigh the loss of the current or former use.

9.4.4 At the heart of Darlington's green infrastructure network is a network of green corridors. Four green corridors including the River Tees and the River Skerne function within and across the Borough's boundaries, and eight green corridors, including the former Barnard Castle Trackbed, connect neighbourhoods to the urban and rural areas. Most are used now, but some will be new corridors (or parts of) added over the lifetime of this plan. In particular these will connect the strategic development locations and the urban fringe, provide connectivity within the inner urban area and enhance biodiversity (see Policy ENV 7) and movement (see Policy IN 1) across the Borough.

9.4.5 The widths of the green corridors have not been defined on the policies map as they are distinct, and this will vary along the length of each corridor depending on its qualities, characteristics and surroundings in any particular location.

9.4.6 Development proposals on sites crossed by, or adjacent to a green corridor should positively protect, incorporate and enhance the functions and features of the corridor as appropriate. Sites related to a proposed green corridor will be expected to actively incorporate the corridor into the layout and design of the development, responding to the specific landscape characteristics of the site (see Policy ENV 3), retaining existing natural assets and distinctive features as appropriate. In all cases, developments will be expected to respond to the priorities for each corridor and seek to deliver the projects identified in the Green Infrastructure Strategy[47].

9.4.7 In the long term the Town Centre Fringe Masterplan will guide the creation of a new green corridor adjacent to the River Skerne and development on the eastern side of Darlington should seek to establish an extensive new wildlife friendly space further upstream adjacent to the river. Both will help re-create a more natural course for the river, provide environmental and water quality enhancements and improve access for people and wildlife. In addition, development of the Skerningham Strategic Allocation (see Policy H 10) will include enhancements of the river corridor to the north of the town.

9.4.8 Policy ENV 4 protects green corridors as well as a range of green spaces in the urban area and the villages, sports facilities (see also Policy ENV 9) and the diverse landscapes they connect for recreation, play, nature, movement and amenity[48]. The policy applies equally to land currently in use or last used for these purposes, including land that has been neglected for an extended period of time but is capable of being brought back into active use with reasonable endeavours. The decision on whether development proposals are assessed as involving the loss of green infrastructure will be determined on a case-by-case basis in line with this policy.

[47] The projects related to each corridor are set out in Darlington's Green Infrastructure Strategy: A Guide to Darlington's Green Infrastructure 2013-26, DBC, 2013.

[48] Individual green spaces have not been identified on the policies map but can be viewed on the online mapping resource on the Council's Planning Policy website.

9.4.9 Most people have easy access to good quality parks and other green spaces for formal and informal recreation and play, while Darlington's impressive play offer means that most children have easy access to adventurous play, for example at West Park and Broken Scar. Wildlife friendly spaces, including Local Nature Reserves and Local Wildlife Sites, provide most people with access to a quality natural environment (see Policy ENV 7), and a complementary network of smaller spaces provide for informal recreation (e.g. walking, jogging) close to homes and work.

9.4.10 However, quantity, quality and access to different types of open space varies between localities within the Borough. Unmet needs will remain unless existing spaces are put to new uses and/or new spaces are provided. Projects such as the Salters Lane Community Garden have increased the use of existing spaces to meet the needs of residents, and other similar projects are underway, where community groups have got funding from organisations like the National Lottery for the works. Elsewhere planning obligations, secured with new development, may also be used to secure enhancements to existing open spaces and the provision of new spaces to meet the needs of new residents.

9.4.11 The EU Water Framework Directive became part of UK law in 2003[49] 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 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. Development should not adversely affect water-dependent water bodies or groundwater abstractions.

9.4.12 Applicants 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 g. 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.

[49] Water Environment (Water Framework Directive) Regulations 2003.

Policy ENV 5

Green Infrastructure Standards

Developments including ~~20~~ 10 dwellings ~~(or 0.2 hectares)~~ or more, ~~or non-residential developments of 1,000 sqm gross floorspace or more~~, will, subject to the quantity, quality and accessibility of existing provision, be expected to deliver new green infrastructure, to meet the additional need generated calculated using the formula set out in paragraph 9.4.15 and ~~having regard to~~ in line with the most up to date Fields in Trust standards ~~and costs contained in the Green Infrastructure Guidance Note~~ (2024 standards currently set out in the tables 9.1 and 9.2 below).

Non-residential developments of 1,000sqm gross floorspace or more should deliver amenity greenspace appropriate to the number of employees on site. This should be multi-functional, accessible to all and integrate informal exercise opportunities to support health and wellbeing. These proposals should also maximise opportunities for the provision of natural and semi-natural greenspace including tree planting as part of a landscape-led approach to design.

Proposals meeting the thresholds above should provide a Green Infrastructure Plan (as part of a Design and Access Statement) setting out how they will achieve these standards and deliver the 15 Green Infrastructure principles in the Natural England Green Infrastructure Framework where relevant. Proposals should also ensure arrangements are in place for the management and maintenance of new green infrastructure provided in the longer term.

Green infrastructure should preferably be delivered on-site and designed as multi-functional blue-green space to perform a range of green infrastructure functions and incorporate tree planting where possible. Provision should be prioritised subject to need and having regard to the types, ~~and~~ quantities and accessibility of existing green infrastructure in the area ~~as identified in the Darlington Green Infrastructure and Open Space Strategies along with any other relevant evidence~~. Where it is not feasible to deliver certain types of Green Infrastructure provision on-site or, in circumstances where it can be demonstrated that off-site provision would deliver greater benefits to the wider community (subject to still satisfying the accessibility standards), a financial contribution will be required towards the improvement of off-site green infrastructure in the local area, calculated using the formula set out in paragraph 9.4.15. This should be equivalent to the additional need generated by the proposal

~~In areas of open space deficiency (identified in the Darlington Green Infrastructure Strategy and Open Space Assessment or equivalent), schemes of between 11 and 19 dwellings (or 0.1 to 0.2 ha), or non-residential development of 500sqm to 1000sqm gross floorspace, will be required to make a financial contribution towards the improvement of off-site green infrastructure in the local area, calculated using the formula set out in paragraph 9.4.15. This should be equivalent to the additional need generated by the development and where this would deliver greater benefits to the wider community than on-site provision.~~

Table 9.1: Green Infrastructure Quantity and Accessibility Standards

Green Infrastructure Type	Minimum Quantity Standard	Maximum Walking Standard (metres)
Amenity Greenspace	0.60 hectares per 1000 population (6 sqm per person)	400m
Natural and Semi-Natural Greenspace	1.8 hectares per 1000 population (18 sqm per person)	800m
Parks and Gardens	0.8 hectares per 1000 population (8 sqm per person)	800m
Equipped Play – Local Areas of Play (LAP), Local Equipped Areas of Play (LEAP), Neighbourhood Equipped Areas of Play (NEAP)	0.25 hectares per 1000 population (2.5 sqm per person	LAP – 100m LEAP – 400m NEAP – 1000m
Informal Play (can include multi-use game areas, pump tracks, bouldering, skate parks and social areas amongst others)	0.3 hectares per 1000 population (3 sqm per person)	700m

Table 9.2: Equipped and Informal Play Areas Size Standard

Play Space Type	Minimum Size Standard
Local Areas for Play (LAP)	100 square metres distributed within a development as part of playable routes
Local Equipped Areas for Play (LEAP)	400 square metres
Neighbourhood Equipped Areas for Play	1000 square metres
Informal Play	1000 square metres (a typical MUGA is 40x20m)

9.4.13 The requirements in Policy ENV 5 will be used to ensure that there is enough accessible green infrastructure overall to meet the needs of development with priority given to the provision of ~~wildlife friendly~~ natural and semi-natural green space and features associated with water and flood management systems. Spaces must also be of the appropriate quality and within ~~a reasonable~~ the maximum walking standard distance of most people's homes to ensure they are used positively. The policy will also help support efforts to attract external funding for improvements, prioritise initiatives for planning obligations and help guide the Council's investment decisions. Guidance on integrating green infrastructure into new development is available in the Revised Design of New Development SPD, ~~Darlington Design Code~~ or its replacement.

9.4.14 As the Borough is relatively rich in the amount of open space it contains, new space will only be sought as part of major new development[50] where the amount and mix of development proposed requires substantial green infrastructure to deliver a sustainable new neighbourhood, or to create an appropriate business or leisure environment. The Council recognises it is not always possible to achieve this all on-site; in those cases, equivalent off-site provision will be sought. Also, for certain types of green infrastructure such as ~~playing pitches~~ equipped play it may be impractical to deliver as a standalone ~~pitch~~ facility and more beneficial to contribute to the enhancement of an existing accessible off-site facility. ~~For smaller developments in areas of open space deficiency a contribution towards improving the quality and functionality of existing open space may be required to ensure that the space is able to meet the needs of additional residents.~~ This approach will also ensure that the network can continue to provide for other functions that green infrastructure is needed to perform.

9.4.15 Proposals where it has been identified green infrastructure provision is required should use the following formula to establish the amount of green infrastructure type to be provided by each new home and the financial contribution required in circumstances where an off-site financial contribution is required. A dwelling occupancy average of 2.2 should be applied which is the figure for Darlington Borough from the latest Census (2021) until an updated average is provided. The green infrastructure type standard per resident to be used are set out in table 9.1 above. These are based on the Fields in Trust benchmark standards which are considered a robust basis as the current Open Spaces Assessment for the Borough is out of date. Should an updated Open Spaces Assessment be completed for the Borough which calculates locally tailored standards then these should be utilised. ~~Where proposals are providing a contribution towards quality improvement costs only this will be 50% less of the standard charge for quantitative provision~~. ~~The same formula below will be applied to proposals for non-residential development where green infrastructure provision is required by replacing the dwelling occupancy with the employee occupancy of the proposal and applying a lower green infrastructure type standard per employee reflecting the lower level of usage~~. ~~Further information on the inputs to the formula is~~

[50] Major new development: ~~20~~ 10 or more dwellings or 1,000 metres gross non-residential floorspace.

~~available in the Green Infrastructure Guidance Note or its replacement.~~

- **Step 1 – Establish quantity required -** Dwelling Occupancy (2.2) multiplied by (x) green infrastructure type standard per resident equals (=) amount of green infrastructure type required per proposed dwelling
- **Step 2 – Determine financial contribution required for off-site provision -** Amount of green infrastructure required per proposed dwelling multiplied by (x) cost of provision equals (=) standard charge per proposed dwelling
- ~~**Step 3 – Determine financial contribution required for off-site quality improvement costs** - Standard charge per proposed dwelling divided (/) by 2 equals (=) quality improvement costs per proposed dwelling~~

9.4.16 In exceptional cases where these requirements cannot be delivered a comprehensive, open book viability assessment should be submitted with the planning application to show why a development cannot achieve these requirements.

9.4.17 Provision should also be made for the maintenance of green spaces to ensure quality remains in the long term. For new large greenspaces, particularly those in the strategic locations, a maintenance levy[51] will typically be applied to each household and/or business, to ensure long term maintenance by a management company. Elsewhere, a one-off maintenance contribution may be sought so that maintenance can be undertaken by the Council and in these circumstances the formula below should be used to calculate a contribution equivalent to 10 years maintenance. ~~Where the maintenance sum is for off-site quality improvements costs the amount will be reduced by 50%~~. The same formula below will be applied to proposals for non-residential development where green infrastructure provision is required by replacing the dwelling occupancy with the employee occupancy of the proposal. ~~Further details on the approach to implementation can be found in the Green Infrastructure Guidance Note or its replacement.~~

- **Step 1 – Establishing maintenance sum required -** Dwelling Occupancy (2.4) multiplied by (x) average maintenance cost equals (=) maintenance cost per dwelling multiplied by (x) 10 = one off maintenance sum
- ~~**Step 2 – Determining maintenance sum for off-site quality improvement costs** - One off maintenance sum divided by (/) 2 equals (=) quality improvement maintenance sum~~

[51] Maintenance levy: annual sum paid by the houseowner or property owner to an independent body or management company to enable the long-term maintenance of green space.

Local Green Spaces

9.5.1 Local Green Spaces 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.

9.5.2 The National Planning Policy Framework makes it clear that Local Green Space designation will not be appropriate for most green areas or open spaces, and sets out that designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing pitch), tranquility or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

Policy ENV 6

Local Green Space

Development will not be permitted within a Local Green Space, designated either within the Darlington Borough Local Plan or a Neighbourhood Plan, unless it is consistent with the National Policy approach for Green Belts.

The sites in Table 9.3~~1~~, and identified on the Policies Map, are proposed for designation as Local Green Spaces:

Table 9.~~1~~3: Local Green Spaces Identified in Darlington Local Plan

Site Reference	Site Name
LGS01	Beech Wood
LGS02	Springfield Park
LGS05	Fryers Field Recreation Ground
LGS12	North Park
LGS14	Merrybent Community Woodland
LGS15	Almora Hall Field, Middleton St George
LGS16	Middleton St George Playing Field
LGS17	Water Park, Middleton St George

LGS22	Tower Hill to The Front Middleton One Row
LGS23	Field to the East of Middleton Lane, Middleton St George
LGS28	Tommy Crooks Park
LGS31	Bellburn Field

9.5.3 In making the decision on whether or not a green area should be designated as a Local Green Space, the Council has considered whether any additional local benefit would be gained by its designation in addition to another existing designation, such as a Local Nature Reserve or Conservation Area.

9.5.4 Designation as a Local Green Space gives an area protection consistent with that in respect of Green Belt.

9.5.5 In addition to the Local Plan, communities have the opportunity to identify and designate land as Local Green Space in neighbourhood plans.

9.5.6 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.

Protecting and Enhancing Biodiversity and Geodiversity

9.6.1 National planning policy sets out the importance of conserving and enhancing biological and geological diversity and statutory obligations are established for conserving and enhancing biodiversity and geodiversity through Natural Environment and Rural Communities Act (2006) and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019). The Environment Act (2021) introduced a range of measures including legally binding targets for nature recovery, mandatory biodiversity net gain requirements for new developments and the production of Local Nature Recovery Strategies. This policy aims to protect and enhance biodiversity and geodiversity within the Borough, in particular, the effect of new development on biodiversity and geodiversity assets. It provides detail on how potential impacts will be considered, to give more certainty to applicants and decision makers.

9.6.2 Darlington Borough currently has 42 nationally and locally designated wildlife sites[52], providing different levels of protection for a growing range of protected and priority habitats and species, including Skylark, Yellow Wagtail, Grey

[52] Designated sites in Darlington: Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LWS) and Community Woodland.

Partridge, Lapwing, Noctule Bat and Daubentons's Bat[53]. Nationally protected sites (Neasham Fen, Hells Kettles, Newton Ketton Meadows and Redcar Field SSSIs) will continue to be protected and enhanced, consistent with national legislation[54] and the objectives in their management plans, whilst Local Nature Reserves (such as The Whinnies and Drinkfield Marsh), Local Wildlife Sites and Community Woodlands have local protection. There are also three Local Geological Sites that protect areas of geological value in the Borough.

9.6.3 The Council intend to investigate the potential of designating new Local Nature Reserves, and the enhancement or extension of existing to provide greater protection for the protected and priority habitats and species that live there. Other Local Nature Reserves may come forward through site development and involvement with communities. This will help the Borough meet the national standard for Local Nature Reserves.

9.6.4 In comparison to neighbouring authorities, Darlington does not have much designated land of a European or National standard, so the 300 hectares of other local wildlife friendly greenspaces, for example, Cocker Beck and Baydale Meadows, are therefore of high importance within the Borough. They allow wildlife, including protected Water Voles and Great Crested Newts to move between designated spaces for feeding, mating and migrating, so helping to ensure biodiversity remains viable in the long term.

9.6.5 'More, better, bigger and connected sites'[55] across the Borough, linked by wildlife corridors, smaller wildlife rich 'stepping stones' and 'buffer zones', such as along the existing and proposed strategic green corridors, will help establish healthy ecological networks for all species[56], including the Brown Trout, Little Grebe and Grey Wagtail, and allow ecosystems to be sustained, with attendant benefits[57]. The alternative, managing spaces in isolation, could lead to a decline in their number, quality and mix, potentially resulting in habitats being lost and the beneficial functions of ecosystems being reduced.

[53] New sites are capable of being designated and existing sites de-designated over the course of the plan period based on the results of up-to-date survey work. The Tees Valley Nature Partnership maintain a list of designated wildlife sites in Darlington Borough on their website: www.teesvalleynaturepartnership.org.uk

[54] Natural Environment and Rural Communities (NERC) Act 2006, and the Conservation of Habitats and Species Regulations 2017.

[55] Biodiversity 2020: A Strategy for England's wildlife and ecosystem services, DEFRA 2011.

[56] Identified by the Tees Valley Biodiversity Action Plan (BAP), Tees Valley Nature Partnership, 2013.

[57] E.g. breaking down waste products, regulating water and air quality, pollinating food and climate control.

Policy ENV 7

Biodiversity and Geodiversity and Development (Strategic Policy)

The Council will ensure that sites and features of biodiversity and geodiversity importance including soils are given full and appropriate recognition and protection. The Council will also permit proposals where the primary objective is to conserve or enhance biodiversity where they accord with other relevant policies in the Plan.

Development will be refused if significant harm to biodiversity or geodiversity, either alone or in combination, cannot in the first instance be avoided, adequately mitigated, or, as a last resort, compensated for.

Development will be expected to minimise the impact on and provide net gains for biodiversity, including establishing coherent and resilient ecological networks, by:

a. Avoiding or mitigating adverse impacts upon BAP priority or protected species. Any potential adverse impact upon the ability of protected species to survive, reproduce and maintain or expand their current distribution will be monitored through application of the derogation tests detailed in the Habitats Regulations, and;

b. Significantly and demonstrably enhancing the quality, extent and mix of priority and protected habitats and species identified in the NERC list[58] and the proposed Tees Valley Local Nature Recovery Strategy through:

   i. Incorporating native habitats, or habitat opportunities, within or around the site and/or as part of building design; and
   ii. Creating, improving or extending ecological networks; and
   iii. Contributing to the implementation of the management plans of the Tees Valley Nature Partnership within the Borough and the aims and outcomes of the Tees Valley Local Nature Recovery Strategy.

Enhancement measures must be compatible with existing biodiversity and ecosystems.

Development proposals located within the areas listed below are encouraged, where relevant, to support the achievement of these specific actions as follows:

A) River Tees Existing Green Corridor

Encourage the protection and enhancement of Protect and enhance connections between different parts of the ecological network through:

i. Providing or retaining a minimum of a 10m buffer zone to watercourses and creating quality riverside habitats to support priority habitats and species in buffer zones (see Policies ENV 4 and ENV 5);
ii. Managing agriculture less intensively;
iii. Planting native trees and ground plants;
iv. Diversifying the mix of wetland and wet woodland habitats;
v. Management of invasive species; and
vi. Creating artificial habitats such as otter holts and bird boxes.

[58] Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 - Habitats and Species of Principal Importance in England.

B) River Skerne Proposed Green Corridor

~~Encourage improvements to~~ Improve the value and ecological mix ~~to~~ through:

i. Providing or retaining a minimum of a 10m buffer zone to watercourses and creating quality riverside habitats to support priority habitats and species in the buffer zone (see Policies ENV4 and ENV5);
ii. Restore the natural river course, systems and character, e.g. meanders and earth bank sides;
iii. Retain the natural floodplains;
iv. Incorporate sustainable drainage systems;
v. Plant more native broadleaved trees, grassland and wetlands to accommodate a range of protected and priority habitats and species;
vi. Incorporate green features, such as green roofs and green walls; and
vii. Manage invasive species.

C) Rural area

Promote the reinstatement of traditional species rich field margins, hedgerows and trees, along with new opportunities for mixed habitats, including meadows, woodland and wetlands, to provide greater connectivity for wildlife (see Policies SD 3, H 7 and E 3).

D) Internationally, nationally and locally ~~designated wildlife~~ important sites

Protect, maintain and where appropriate manage (as it depends upon ownership) and extend, in accordance with their management plans. Sites will be protected as follows:

i. Internationally Important Sites

Development likely to have an adverse affect on any internationally important site, irrespective of its location, will be assessed in accordance with the relevant legislation.

ii. Nationally Important Sites - Sites of Special Scientific Interest (SSSIs)

Development likely to have an adverse effect on any of the Borough's or neighbouring SSSI's either individually or in combination with other developments, will not normally be permitted unless it can be demonstrated that the benefits of the proposed development in that particular location, clearly outweigh its likely impact on the features of the site that make it of special scientific interest and any broader impacts on the network of sites. The SSSI's located in the Borough are Neasham Fen, Hells Kettles, Newton Ketton Meadows and Redcar Field

iii. Locally Important Sites - Local Nature Reserves and Local Wildlife Sites

Development likely to result in significant harm to any of the Borough's Local Nature Reserves or Local Wildlife Sites should be avoided by being relocated to an alternative site of less harmful impacts. Where this is not possible, and it is demonstrated development is required in that location it will only be permitted if the significant harm can be overcome by adequate mitigation or as a last resort appropriate compensation measures.

Investigate the possibility of designating new Local Nature Reserves which meet the Natural England Criteria to ensure the protection of land and species.

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.

iv. Community Woodlands and Ancient Woodland

New development will be expected to retain existing woodlands. Development will not be permitted that would result in the loss of woodland unless the benefits clearly outweigh the loss and suitable replacement planting can be undertaken which provides woodland types matching those identified as Priority Habitats in the NERC List [59] that are found locally. Ancient woodlands, ancient and veteran trees are irreplaceable habitats, and new development will not be permitted that would result in their loss, fragmentation, isolation or deterioration unless there are wholly exceptional reasons (as defined in national policy) and a suitable compensation strategy exists.

E) Local Geological Sites (LGSs)

Protect and support the enhancement and positive management of the existing sites at Killerby (North Lane Quarry), Houghton-le-Side (Disused Quarry, Side Hill) and High Coniscliffe Quarries (Disused) and designate new sites as appropriate.

F) Wildlife friendly green spaces, parks and parklands, green wedges, rural gaps and green corridors

Protect and improve the biodiversity value of green spaces, parks and parklands, green wedges, rural gaps and green corridors and enhance their role as stepping-stones and corridors in the wider habitat network.

Policy ENV 8

Assessing a Development's Impact on Biodiversity (Strategic Policy)

Non-exempt development proposals will be required to provide and deliver net gains in biodiversity in accordance with the statutory Biodiversity Net Gain requirement and framework and demonstrate achievement of this using the Defra Biodiversity Metric.

In order to maximise opportunities for the enhancement of ecological networks within Darlington and/or the Tees Valley Local Nature Recovery Strategy Area, and support nature-based solutions to climate change, development proposals should seek to deliver Biodiversity Net Gain onsite wherever possible. Where ecologically appropriate Biodiversity Net Gain is demonstrated not to be deliverable onsite, the applicant shall prioritise the delivery of Biodiversity Net gain offsite in accordance with the following locational hierarchy:

a. Within Darlington Borough on designated wildlife sites and nature reserves;

b. Elsewhere within Darlington Borough;

c. Within the wider Tees Valley Local Nature Recovery Strategy Area; and

[59] Identified under Section 41 of the Natural Environment and Rural Communities Act (2006) on the England Biodiversity List as habitat of principal importance for the conservation of biodiversity.

d. Within a neighbouring Local Nature Recovery Strategy Area

All development proposals will be required to include features which support priority or threatened species unless there are compelling technical reasons which prevent their use or make them ineffective. These are:

i. Integrated nest boxes (swift bricks);

ii. Integrated bat boxes; and

iii. Hedgehog Highways

As part of their design all development proposals should include biodiversity enhancement measures including bird nest boxes, bee bricks, native plant and tree species planting, pollinator friendly planting including moon meadows and other wildlife features where appropriate.

Development proposals that are situated within or adjacent to sites of biodiversity importance as identified in Policy ENV 7, or that are likely to have an adverse impact upon such sites[60] or upon sites that have a reasonable likelihood of hosting protected and/or priority species, will need to follow the sequence of actions set out below to identify how harm to biodiversity has been avoided, or failing that, adequately mitigated. Applicants should submit evidence that this process has been followed with any planning application:

1. Undertake a Preliminary Ecological Appraisal to establish the type and mix of habitats and species present and any likely impacts;

2. For any habitats or species adversely affected, undertake an Ecological Impact Assessment and/or species/habitat specific surveys and identity appropriate mitigation, compensation and/or enhancement;

3. Where protected species are present (including species protected under the Conservation & Habitats Regulations, and Wildlife and Countryside Act), further survey work will be required to comply with Habitats Regulations including fulfilling the three derogation tests; and

4. Take account of, and reflect the detailed advice set out in, Darlington's Green Infrastructure Strategy and the Design SPD or successor documents.

In relation to protected species and their habitats, all development which, alone or in combination, has a likely adverse impact on the ability of species to survive, reproduce and maintain or expand their current distribution will not be permitted unless:

e. appropriate mitigation, or as a last resort compensation, can be provided, which maintains a viable population and where possible provides opportunities for the population to expand and;

f. where the species is a European Protected Species, the proposal will be required to meet the licensing criteria (the 3 legal tests) of overriding public interest, no satisfactory alternative and favourable conservation status

[60] Sites situated further from a designated site may still have an impact - Natural England have developed buffer zones for SSSIs depending upon the type of development which may prove useful when considering applications.

Where a development proposal cannot avoid significant harm to biodiversity following the consideration of avoidance measures and mitigation, as a last resort, suitable compensatory measures must be incorporated, including the creation of priority habitats [61], with the first priority being on-site provision. Only with adequate reasoned justification will any off-site compensatory measures be permitted, with any such provision, agreed to be adequate and appropriate, secured by Section 106 contribution (or any other future delivery mechanism).

Where adequate compensation measures cannot be provided, and significant harm avoided, planning permission will be refused.

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.

9.6.6 The NPPF [62]states that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other measures, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. The Environment Act enshrines the requirement to deliver biodiversity net gains in law.

9.6.7 Connectivity will be improved along watercourses, including the strategic River Tees and River Skerne, public rights of way, railway lines and along field margins in the rural area, to ensure species can move easily across and beyond the Borough. Improving the biodiversity value of lower quality urban greenspaces will provide valuable habitats for species, including the Dingy Skipper, White-letter Hairstreak, Wall Brown and Holly Blue butterfly, and nesting birds like the Song Thrush and Tree Sparrow, which are in national decline.

9.6.8 Darlington's Green Infrastructure Strategy includes a number of measures to improve the environmental and recreational value of the Borough's green corridors and should be read alongside this policy when considering development proposals affecting a green corridor.

9.6.9 There are also opportunities to increase the stock of protected and priority habitats and species through well-designed new developments[63], especially in the strategic locations. In addition, development in the Town Centre Fringe (see Policy TC 6) will provide opportunities to greatly enrich local biodiversity.

9.6.10 Biodiversity varies according to location and the presence of protected and priority habitats and species. The type and level of assessments required alongside new development proposals will reflect biodiversity value, and an

[61] As detailed in the NERC list.

[62] Paragraph 187d, NPPF (December 2024)

[63] In accordance with the Revised Design of New Development SPD, DBC, 2011.

Ecological Impact Assessment[64], tree surveys and/or detailed species surveys may be required if protected or priority habitats and species are likely to be present. Through a Landscaping Plan and/or the Design, Access and Sustainability Statement, the design and layout of new development should be informed by, and respond positively to, the ecological value of the site and the immediate environment and show how this will be protected and enhanced. Even where little biodiversity exists, functional ecological networks should be created; landscaping schemes and green roofs and walls can provide nesting sites, roosting sites and shelter for birds, bats and amphibians. Provision in or adjacent to a green corridor or a designated site, should be informed by the strategic aims of the corridor[65]and in the site's management plan.

9.6.11 It should be noted that the presence of protected species or habitats is not limited to the designated sites described above. Where internationally and nationally protected species, such as the otter and water vole are identified, development should protect them and their breeding and resting places from disturbance or injury. This will be monitored through application of the derogation tests set out in national legislation[66].

9.6.12 New development is required to support protected and threatened species such as bats, swifts, and other nesting bird species which rely on buildings to roost and nest. Integrated features such as bat boxes/bricks, and swift bricks should be installed into the development where feasible. These features should be relevant to the location and type of development and designed and installed using best practice guidelines. To ensure connectivity for wildlife within gardens, hedgehog highways should be installed into fences and other boundary features which allow access and egress into and between gardens. Other features such as bee bricks, invertebrate and amphibian refugia and hibernacula should be considered within developments at appropriate locations. The Council's Ecologist will work with applicants through the planning application process to identify suitable locations for these features.

9.6.13 With the exception of protected species where a licence may need to be sought from Natural England, impacts which are unavoidable should be fully mitigated for within the locality. Appropriate enhancements can include maintaining existing priority habitats, creating new habitats, providing sustainable drainage schemes with wetlands and reedbeds (see Policy DC 3), new native woodland and street trees and the protection of existing trees[67] (including ancient woodland and veteran trees) on or off-site, particularly in the strategic locations. Planning conditions and/or planning obligations may be used to

[64] Phase 1 Habitat Surveys assess habitats present, rare plant species, and whether the habitat has potential to shelter protected or BAP species.

[65] As identified in Darlington's Green Infrastructure Strategy, DBC, 2013.

[66] Detailed in the Conservation of Habitats and Species Regulations, 2017.

[67] Through Tree Preservation Orders (TPO).

secure mitigation.

9.6.14 Off-site mitigation measures will only be considered where there are justifiable ecological reasons that would result in a more appropriate solution to potential impacts on biodiversity as a result of development. This may include the relocation of a species or habitat to a more favourable location owing to existing circumstances or the creation of new habitats in an area nearby that will have a greater gain in biodiversity than that which can be provided on-site. Such provision would be an exception from the normally accepted choice of protecting species and habitats on-site or providing alternative on-site mitigation measures and will therefore be expected to clearly set out in the supporting ecological study why off-site provision would be an acceptable solution. It is not considered that geological mitigation could be provided off-site and satisfactory on-site solutions should be found if planning permission is to be granted.

9.6.15 The Council has identified a biodiversity offsetting site near Whessoe Road for the enhancement and establishment of open mosaic habitat. The Council is also exploring the potential to identify further biodiversity and nutrient neutrality offsetting sites within the Borough to help compensate for the impact of developments on biodiversity in the Borough where provision cannot be made on-site in line with Policy ENV 7 and ENV 8. There is also a potential need to identify an appropriate offset site for Great Crested Newts. Examples where this offsetting approach has been successful in the past include the creation of a large wildflower meadow at Baydale Farm on the Teesdale Way and a mosaic of wetland habitats off Staindrop Road, Cocker Beck.

9.6.16 The Council will continue to maintain access to up-to-date environmental and other relevant data, including Natural Network Mapping, and will continue to work closely with the Tees Valley Nature Partnership in implementing and monitoring policies and proposals affecting the natural environment.

Outdoor Sports Facilities

9.7.1 Access to good quality, accessible, managed outdoor sport and recreation facilities can have an important role on the health and quality of resident's lives. Consequently, the Council aims to protect, enhance and extend the sporting offer in the Borough, to ensure that provision meets residents' needs now and in the future.

9.7.2 Outdoor sports and recreation facilities cover playing fields and Artificial Grass Pitches (AGP) as well as a wide range of other facilities for tennis, bowling, golf, athletics and cycling, in the urban area and the villages. Between them, they enable people to enjoy sport at parks, schools and private clubs, either for casual, 'pay as you play' or competitive use. Within each playing field, a number of playing pitches can be marked out, sizes are different for adults and juniors, and the mix of pitches can vary to reflect the sporting seasons.

Policy ENV 9

Outdoor Sports Facilities

Outdoor sports facilities will be protected in line with Policy ENV4 and, where appropriate, facilities will be improved and extended, to provide a safe and accessible network of quality facilities for outdoor sport.

Through investment, management and maintenance, the most effective use will be made of the network in the future, consistent with the priority actions identified in the Playing Pitch, Outdoor and Indoor Sport ~~Built Facility~~ Strategy ~~Update~~ 2026 ~~2021~~ (or later updates).

When considering development proposals of ~~2~~10 dwellings or more the Council will use the Sport England Playing Pitch and Facility Calculator informed by the Playing Pitch, Outdoor and Indoor Sport ~~and Built Facility Strategy~~ (2026 ~~2021~~ or later updates) to determine the need, and where required, total amount of developer contributions required towards outdoor sport facilities.

Proposals for the development of new outdoor sports facilities will be permitted where:

a. They are located within or adjacent to the development limit of a settlement, unless it can be demonstrated that they require a countryside location;

b. The proposal would not give rise to significant traffic congestion or road safety issues;

c. They can be accessed by walking, cycling and public transport in line with Policy IN 2;

d. They protect the amenity of existing users of neighbouring land and buildings in line with Policy HC 2; and

e. New buildings or structures are well designed and appropriately integrated into the landscape.

9.7.3 Playing fields are provided and maintained in accordance with a hierarchy of provision. The focus are the three managed hub sites at Blackwell Meadows, Eastbourne Sports Complex and Longfield Academy which provide facilities for different sports for adults and juniors and have changing rooms and car parking. All have secure community use and provide for competitive league matches as well as 'pay as you play'. A complementary network of smaller satellite sites including schools, parks and sports clubs provide for pitch sports closer to home and work. Single pitch sites in open spaces are the lowest tier and generally have no changing rooms or car parking. Continued use of this hierarchy will ensure provision best meets local needs and future demands and encourages greater participation in sport in a cost-effective way.

9.7.4 The amount, quality, carrying capacity and accessibility of each playing field in the urban area and villages has been assessed in the Playing Pitch, Outdoor and Indoor Sport ~~and Built Facility~~ Strategy (~~2021~~ 2026) to determine whether there is enough provision to meet the demand for football, rugby union, cricket

~~and~~ hockey, tennis, bowls, athletics and indoor built sport facilities for adults and juniors, now and in 2031. All playing fields will be protected by this policy and Policy ENV 4, and in line with national policy and that of Sport England[68]. The Council will consult Sport England on applications involving the loss or alteration of a playing field as required by legislation[69]. Indoor built sport facilities are protected by part c of IN10 relating to community facilities.

9.7.5 New outdoor sports facilities should, where appropriate, include changing and ancillary provision and meet with National Governing Body (NGB) standards and, wherever possible, should be developed in conjunction with existing clubs. The following general criteria should also be met:

- A high standard of design, construction and maintenance appropriate to the standard of play
- Adequate changing facilities that:
    - Are flexible, fit for a variety of purposes;
    - Fully comply with the provisions of the Disability Discrimination Act;
    - Provide for a number of different groups to use the facility at the same time, in safety and comfort, and
    - Meet current standards – Sport England and NGB guidelines.
- Managed community access
- Accessible by walking, cycling, public transport and by car
- Sufficient car and cycle parking (In accordance with standards in the Tees Valley Design Guide)
- Size of pitches and run offs complies with NGB specification
- Security of tenure (at least 20 years) if a club is to be based at the site.

9.7.6 The ~~Council is currently in the process of updating the 2021~~ recently updated Darlington Playing Pitch Outdoor and Indoor Sport ~~and Built Facility~~ Strategy (2026) ~~along with the accompanying needs assessment and evidence base.~~ This ~~work may identify particular areas of need and opportunities for providing~~

[68] Playing Fields Policy and Guidance, Sport England, 2021.

[69] The Town and Country Planning (Development Management Procedure) (England) Order 2015.

~~new sports facilities over the course of the plan period.~~ has identified a need for the provision of facilities including a new grass multi pitch football hub through either on-site provision in a strategic housing development or through the pooling of contributions from smaller housing developments. A need was also identified for the creation of up to 3 additional artificial grass pitches primarily at existing facilities and an informal athletics track.

Trees and Hedges

Policy ENV 10

Trees and Hedges (Strategic Policy)

Development proposals should retain and protect trees and hedges, both on and adjacent to the site and particularly those that have amenity, biodiversity, landscape or historic value or contribute to the setting and/or character of a settlement unless ~~the benefits of the proposal clearly outweigh the harm.~~ It can be clearly demonstrated that removal is unavoidable due to site specific constraints and appropriate compensatory replacement planting can be provided.

Trees
The layout of development proposals should treat trees, both on and adjacent to the site, as a constraint at the earliest stage of the design process and, where relevant, be designed to:

a. retain and avoid the need to remove trees by integrating them fully into the design and layout, wherever possible;
b. provide for the successful retention and protection of trees during development such as through root protection zones where necessary;
c. safeguards trees future health, having regard to their future management requirements and growth potential, such as through the use of adequate stand-off distances; and
d. avoiding future conflicts and unacceptable impacts on residential amenity and highway safety.

Development proposals resulting in the loss of, or damage to trees will be required to provide suitable replacement trees on-site, ~~or where this is not possible, suitable compensatory planting off-site in the locality,~~ including appropriate provision for management and maintenance.

Development proposals resulting in the loss or deterioration of trees and woodland that are irreplaceable habitats such as ancient woodland or ancient or veteran trees will be refused ~~considered~~ in accordance with national policy, except in wholly exceptional circumstances and where a suitable compensation strategy exists.

Applications to fell or carry out other works to trees subject to a Tree Preservation Order or located in a Conservation Area will be determined in accordance with the Council's policies set out in the Tree & Woodland Strategy (2021-2031) or its replacement.

Where trees are removed, the deadwood created should, where appropriate, be retained on-site to create invertebrate/amphibian/hedgehog refugia and hibernacula.

Where safe, and appropriate to do so, larger tree trunks/stems should be retained as standing monoliths to support wildlife such as woodpeckers and bats.

Development proposals should provide a Canopy Cover Assessment and demonstrate no net loss in tree canopy cover on site. ~~Where this is not possible compensatory provision should be made and secured in the locality~~.

Development proposals should contribute to the overall tree population incorporating trees into the development. New trees should be native or a climate appropriate species and planted using suitable methods to secure their future health.

Development proposals creating new streets should ensure that they are tree-lined unless there are clear, justifiable and compelling reasons why this would be inappropriate.

Appropriate measures should be put in place to secure the long-term maintenance of newly planted trees.

Hedges

The layout of development proposals should treat hedges, both on and adjacent to the site, as a constraint at the earliest stage of the design process and, where relevant, be designed to:

a. retain and avoid the need to remove hedges by integrating them fully into the design, wherever possible;
b. provide for the successful retention and protection of hedges during development such as through root protection zones where necessary;
c. safeguards the future health of hedges, having regard to their future management requirements and growth potential; and
d. avoiding future conflicts and unacceptable impacts on residential amenity.

Development proposals resulting in the loss of, or damage to hedges will be required to provide suitable replacement planting or restoration of existing hedges on-site, ~~or where this is not possible, off site in the locality~~, including appropriate provision for management and maintenance.

Development proposals should, where appropriate, seek to incorporate native or climate appropriate hedges into the development such as a natural form of enclosure to gardens, vehicle parking areas and open spaces creating habitat, shelter and foraging opportunities for wildlife.

Hedges should be planted using suitable methods to secure their future health and appropriate measures should be put in place to secure the long-term maintenance of newly planted hedges.

9.8.1 Trees and hedges make an important contribution to the beauty, diversity and distinctiveness of Darlington's rural landscapes and the beauty and liveability of our town and villages. Tree and woodland canopies create shelter and shade,

intercept rainfall and airborne pollutants and regulate the movement of water through river catchments, reducing soil erosion and the leaching of pollutants into surface and ground water. This helps to regulate local temperatures and climate change impacts. The provision of ecosystem services by hedges makes them an important part of the area's natural capital.

9.8.2 Aged and veteran trees are those which, because of their great age, size or condition are of exceptional wildlife, landscape or cultural value. The National Planning Policy Framework (NPPF) says that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including the loss of aged or veteran trees, unless there are wholly exceptional reasons and a suitable compensation strategy is in place. Other trees of amenity, biodiversity, landscape or historic value or contribute to the setting and/or character of a settlement include rare native trees, trees covered by Tree Preservation Orders (TPO) and mature trees. The value of individual trees needs to be assessed on an individual basis.

9.8.3 The Council's intention is to protect all trees worthy of retention wherever possible. Trees are often lost to new development, or subsequently perish, through lack of thought at the design stage. Trees on or adjacent to development sites should be treated as a site constraint from the earliest stages of the design process, and their retention and integration into the development should be an objective in drawing up proposals. The unnecessary loss of trees and hedgerows should be avoided.

9.8.4 Mature trees and hedges are sensitive to the impacts of development, either directly through their removal or indirectly through the impacts of construction. Due to the length of time and the cost taken to replace mature features, and the contribution they can make to the quality of development, they should be retained and protected where possible.

9.8.5 Where trees, hedges and significant landscaping are within or adjacent to a proposal site and could be affected by development, a full tree survey and arboricultural implications assessment to BS 5837 (the British Standard for Trees) will be required as part of the planning application. This should indicate all landscape features, tree species, canopy spreads, trunk diameter and levels at the base of each tree. It should be carried out at a sufficiently early stage to inform the design of the development. The implementation of any protective measures it identifies, will be secured by the use of planning conditions.

9.8.6 The council's adopted Tree and Woodland Strategy (2021-2031) sets out our approach to the management of trees on our own land and also our policy for the protection of privately owned trees. In dealing with applications affecting, or works to, trees in Conservation Areas or protected by TPO, the council will be guided by the principles set out in that document (or any subsequent revisions).

9.8.7 Mature hedges can bring character and maturity to a new development and should generally be retained. Consideration needs to be given to the growth potential and shading characteristics of trees to ensure that they are properly

integrated into the new landscape without creating future conflicts and pressure for removal. Consideration also needs to be given to the growth potential and management requirements of hedges. Where the loss of trees and hedges is unavoidable, they should be replaced with suitable new planting either within the site or, if this is not possible, in the locality. The renovation of existing hedges in the wider area can be an appropriate form of mitigation.

9.8.8 Parts of the Darlington Urban Area, particularly in the west are characterised by their tree coverage and particularly street trees. The benefits for the natural and local environment and climate change of tree canopy cover are widely recognised. Developments should ensure that there is no net loss of existing tree canopy cover therefore any trees that are proposed to be felled as part of a development will need to be replaced to ensure there will be at least as much canopy cover as the existing situation. This will maintain the overall canopy cover of the Borough and enable sites to mitigate and adapt to climate change.

9.8.9 A canopy cover assessment is an assessment of the area of ground directly covered by the leaves and branches of vegetation and is expressed as a percentage. Applicants should submit a Canopy Cover Assessment report which clearly details the percentage of existing canopy cover within the red line boundary of the development site, a Tree Planting Plan, the percentage of canopy cover post development. All tree surveys must be carried out by a suitably qualified arboricultural consultant.

9.8.10 Development can make a positive contribution to the tree resource in the area through on or off-site planting and national policy states the planning policies should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

Nutrient Neutrality

Policy ENV 11

Nutrient Neutrality (Strategic Policy)

Development proposals that will result in a net increase in overnight accommodation or other types of development that would otherwise increase the discharge of nitrogen into the River Tees catchment will be required to achieve nutrient neutrality unless Natural England confirm this is no longer required in the Tees catchment or should an Environmental Delivery Plan be produced for the Tees Catchment and payment to the associated Nature Restoration Levy can be evidenced.

Planning permission will only be granted where the integrity of the Teesmouth and Cleveland Coast Special Protection Area and Ramsar Site is not adversely affected by the proposed development and the requirements of the Conservation of Habitat and Species Regulations, including appropriate assessment have been satisfied.

Applicants will be required to calculate the nutrient budget of their development proposal following the Natural England methodology and using the most up to date Natural England Calculator. Applicants are also encouraged to refer to the Council's Nutrient Budget calculator guidance note. Permission will only be granted where the Council has sufficient certainty that adverse effects can either be excluded, or if that is not possible, appropriately mitigated.

Where mitigation is required, it will need to be satisfactorily demonstrated that this is:

a. appropriate;
b. sufficient to mitigate the identified impact;
c. located in the Tees Catchment, and;
d. secured in perpetuity along with the necessary management and monitoring measures.

Mitigation can be provided through:

i. the purchase of credits from the Natural England Tees Catchment Nutrient Mitigation Scheme;
ii. the purchase of credits from private Nutrient Mitigation Schemes located in the Tees catchment which have been approved by Natural England
iii. the change of use of land, either on or off site within the Tees Catchment that results in a less intensive nitrogen input such as arable to woodland.

9.9.1 In March 2022 Natural England notified the Council that the Teesmouth and Cleveland Coast Special Protection Area and Ramsar Site (hereafter referred to as the SPA) is in an unfavourable condition. This is due to nutrient enrichment, which includes pollution from nitrates, including nitrogen. The SPA is a wetland habitat comprising an area of complex coastal habitats. This is centred on the Tees estuary. It includes a range of habitats. These habitats support internationally important populations of breeding and non-breeding waterbirds. It also includes a high density of benthic (bottom-dwelling) invertebrates.

9.9.2 This notice included statutory advice for Local Planning Authorities within the River Tees catchment, setting out a requirement for new developments to achieve Nutrient Neutrality to avoid adversely affecting the protected site at the mouth of the river tees.

9.9.3 The Conservation of Habitats and Species Regulations 2017 are the UK's transposition of European Union Directive 92/43/EEC on the 'Conservation of natural habitats and of wild fauna and flora' (the Habitats Directive). The Habitats Directive states:
"[Whereas] an appropriate assessment must be made of any plan or programme likely to have a significant effect on the conservation objectives of a site which has been designated or is designated in future".

9.9.4 The SPA is a designated European habitat site, meaning it is offered the highest level of protection under the legislation. The Council, in its role as the Competent Authority, has a statutory duty to ensure that new development proposals accord with this legislation. It must not, therefore, allow development proposals to proceed if they are likely to have a significant effect on the SPA.

9.9.5 The statutory advice issued by Natural England means that certain developments that may lead to an increase in the level of nitrogen in the River Tees, cannot proceed without achieving Nutrient Neutrality. It covers all types of overnight accommodation including new homes, student accommodation, care homes, tourism attractions and tourist accommodation and permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 2015. Tourism accommodation includes self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday chalets and static caravan sites. Other types of proposal will be considered on their individual merits, for example conference facilities that generate overnight stays.

9.9.6 Other types of business or commercial development which have other (non-sewerage) activities which may result in additional nitrogen entering the River Tees will be covered and considered on their individual merits. For example: agricultural development which will result in an increase in stock numbers and anaerobic digestors.

9.9.7 The term 'Nutrient Neutrality' is used to describe an approach whereby the level of nutrients discharged from a site after a development takes place is the same, or lower, than before.

9.9.8 The Natural England Nutrient Neutrality Methodology enables a nutrient budget to be calculated for all types of development that would result in a net increase in population served by a wastewater system. The Natural England Tees Catchment Nutrient Budget Calculator will need to be used to calculate the nutrient impact of proposals and submitted with an application, in accordance with the latest Natural England guidance, to determine whether the development is nutrient neutral. If there is a nutrient surplus, appropriate mitigation will need to be demonstrated through on-site or off-site measures to ensure that any nutrient surplus is mitigated, otherwise development proposals will be refused. The delivery of this mitigation will be secured through an appropriate legal mechanism and/or planning conditions, as necessary. Mitigation will need to accord with the spatial and temporal principles set out in the latest Natural England guidance.

9.9.9 In January 2024 the Tees Catchment was designated as a sensitive area for nitrogen under the Water Industry Act (1991) which was published in the Notice of Designation of Sensitive Catchment Areas (2024). This means that Northumbrian Water Ltd have a duty to ensure wastewater treatment works serving a population equivalent to or over 2,000 meet specified nutrient removal

standards by 1 April 2030. In Darlington Borough this applies to Stressholme Wastewater treatment works and also Aycliffe Wastewater treatment works, which whilst located outside the Borough does serve some locations in the northern most part of the Borough. When considering development proposals draining via a sewer to these wastewater treatment works, subject to the upgrade duty, the Council will assume that the nutrient pollution standard will be met by the upgrade date for the purposes of the Habitats Regulations Assessments. The Natural England Nutrient Budget calculator has been updated to account for this.

9.9.10 Where mitigation is required, a range of mitigation options could be used including (but not limited to):

- On-site mitigation through sufficient greenspace/SUDS/wetlands where appropriate.
- Change of use of agricultural land to a use with less intensive nitrogen input such as woodland/greenspace within the site or elsewhere in the catchment, equalling or exceeding the necessary nutrient budget surplus resulting from the development.
- Purchase of mitigation 'credits' from an acceptable strategic mitigation scheme elsewhere in the River Tees catchment such as the Natural England Nutrient Mitigation Scheme.

9.9.11 Any proposal factoring in the use of SuDS into their nutrient budget calculations should ensure this is designed in accordance with the options set out in the CIRIA guidance document (C815) – Using SuDS to reduce nitrogen in surface water runoff

9.9.12 Mitigation that can be provided locally and within the borough will be encouraged and should incorporate opportunities for creating and improving habitats as identified through the forthcoming Tees Valley Local Nature Recovery Strategy.

10. TRANSPORT AND INFRASTRUCTURE

10.0.1 The Local Plan seeks to improve connectivity, minimise the distance and length of the journey, and make best use of public transport and the highway network while delivering sustainable transport choices. The majority of new residential, commercial and employment developments are therefore guided to the main towns and larger villages where sustainable modes of transport can be provided.

10.0.2 Infrastructure can be physical (e.g. transport, utilities), community and social (e.g. education, health) and environmental (e.g. parks and green spaces). Environmental infrastructure is dealt with in the 'Environment' section of the plan. An Infrastructure Delivery Plan will accompany the Local Plan and will set out the types and levels of infrastructure required to accommodate the growth proposed.

10.0.3 If infrastructure is not delivered alongside new development, it can put pressure on existing facilities that may not have the ability or capacity to cope with the additional demand.

10.0.4 The provision of infrastructure is achieved by a wide range of organisations. The Local Plan, in conjunction with an Infrastructure Delivery Plan, will play a key role in securing public and private sector involvement in infrastructure delivery.

10.0.5 The local plan objectives relating to transport and infrastructure are to:

- Reduce transport's impact on the environment and support health and wellbeing by ensuring that new development is in places where it will be accessible by public transport, cycling and walking and where needed, to secure provision of necessary infrastructure including improvements to existing services including sustainable access to education. Development should create connected neighbourhoods, with local social infrastructure and inclusive public spaces that enable people of all ages and abilities from all backgrounds to access services.
- Connect people with job and training opportunities and link communities. By supporting development that enhances regionally and nationally important transport links including those offered by Darlington Station, Teesside International Airport and Teesport. Deliver strategic infrastructure such as broadband to enhance business and social interaction that supports economic growth including appropriate housing.
- Support a revitalized and transformed Darlington town centre by supporting development in locations where people can easily access the town centre by sustainable transport that leads to an increase in footfall supporting economic growth.

- Ensure that development provides safe roads for all highway users within the development extents and that the impact on the surrounding highway network is mitigated with suitable strategic and local highway improvements so that vehicle trips are undertaken on the most appropriate routes and active travel trips can be prioritised on the local highway network.
- Maintain and effectively manage a resilient transport system including enhancing the Public Right of Way network, managing car parking supply and managing the impacts of climate change on critical infrastructure.

Delivering a Sustainable Transport Network

10.1.1 It is vital that the Borough is accessible by a choice of transport modes and that improvements to the transport infrastructure and services encourage sustainable travel. This is important to unlock the economic growth opportunities within the Borough, and to connect to neighbouring regional centres and strategic national and international gateways such as Teesside International Airport, Teesport and the East Coast Mainline. Owing to its location and existing infrastructure, Darlington Borough also has a key role to play in delivering the wider vision for sustainable transport across the Tees Valley and beyond. The transport and travel needs of those with specific requirements (such as disabled and elderly people, parents with small children and wheelchair users) is also integral to this agenda.

Policy IN 1

Delivering a Sustainable Transport Network (Strategic Policy)

The Council is committed to delivering an efficient transport system with a focus on the provision of infrastructure and public transport improvements, to encourage greater use of sustainable modes, leading to less reliance on single occupancy vehicle journeys. We will work with partners and developers to make the best use of and improve existing transport infrastructure, where appropriate, using developer contributions to manage the impact of development on the transport network.

To achieve this, the following priorities and actions have been identified:

A) For cycling, walking and other sustainable transport:

i. Protecting existing pedestrian routes, cycle routes, restricted byways and bridleways from development which would impair their functioning for recreation or as alternatives to the private car for accessing employment opportunities, shops and other community facilities;

ii. Supporting the development of the key sustainable transport corridors identified within the Tees Valley Local Cycling and Walking Infrastructure Plan and 'Local Green Corridors' identified in the Darlington Green Infrastructure Strategy and safeguarding their routes from development which would impair their functioning for recreation or as routes for pedestrians and cyclists to access employment opportunities, schools, shops and other community facilities;

iii. Improving local connections to reduce severence caused by strategic infrastructure, ~~across busy transport corridors~~ which act as a barrier to local access. This will include working with strategic agencies such as National Highways and Network Rail to ensure the permeability of the A1, A66 and rail networks respectively;

iv. Protecting, maintaining and ~~enhancing~~ improving registered public rights of way network 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, S&DR Discovery Trail and National Cycle Network 14;

v. ~~Identification and development of a~~ Deliver a walking and cycling route in keeping with the original Stockton and Darlington Railway line as close as practicable (See also Policy ENV 2);

vi. Support the development of routes that allow residents in outlying villages to access Darlington, particularly by walking, wheeling and cycling.

B) For rail-based transport network:

i. Improving inter and sub-regional links from neighbouring centres by ensuring that the Borough is served by high quality rail and bus links;

ii. Improving connectivity between other forms of sustainable transport and the rail network mainly by providing improved interchange facilities;

Specific priorities for the rail network:

iii. Supporting Darlington Station to improve interchange facilities at mainline, local and inter-regional routes, potential high speed rail services and sustainable access to the station including bus, walking and cycling.

C) For road-based transport network:

i. Mitigate the impact of development at key junctions, on main arterial routes that form the town's Key Road Network and other important links that contribute to the effective movement of traffic to limit congestion.

ii. Work with National Highways and adjoining authorities to ensure the safe and efficient operation of the strategic and local highway networks;

iii. Provide new local access roads and key road links to open up the locations for development identified in the Local Plan. Such works will be linked to development phasing and secured by legal agreement.

iv. Maintain an efficient public transport network by ensuring new developments accommodate the needs of bus users, facilitate new bus routes and stops where appropriate and mitigate the impact of development trips on bus journey times through the provision of bus priority measures.

Specific priorities for the highway network:

v. Work with National Highways to ensure the existing route of the A1 and A66 is maintained and improved in line with its strategic function and enable residents and businesses to continue to benefit from good links to the strategic road network, with contributions sought from developers to a programme of highway improvements where applicable.

vi. Provision of key routes as part of development proposals within the plan, in conjunction with existing infrastructure, provide additional road, public transport and high-quality pedestrian and cycle links to create an orbital route of the northern urban area of Darlington. These routes are:

- Coniscliffe Park - link road connecting A67 to Staindrop Road;
- Stag House Farm - link road connecting Newton Lane to Staindrop Road;
- Burtree allocation ~~Garden Village link road~~ – link road connecting Rotary Way to Burtree Lane;
- Skerningham allocation ~~link road~~ – link road between the A167 and ~~A66~~ A1150
- Burdon Hill - link road connecting A1150 to B6279 Tornado Way and new link road to Red Hall; and
- ~~Burtree Lane~~ Berrymede Farm – link road connecting new A167 Skerningham roundabout to Burtree Lane.

Regional and Local Context

Transport for the North

10.2.1 Transport for the North (TfN) became the first Sub-National Transport Body in April 2018. Their Transport Plan sets out the case for strategic transport infrastructure investment through to 2050. Their vision is of a thriving, socially inclusive North of England, where communities, businesses and places will all benefit from sustainable economic growth, improved health and wellbeing and access to opportunities to all.

10.2.2 The plan has been developed which outlines how transport connections across the North of England need to be transformed with three strategic ambitions to achieve: Transforming economic performance, rapid decarbonization of the transport system and enhancing social inclusion and health.

10.2.3 As part of developing the evidence base for the Strategic Transport Plan, the Integrated Rail and Major Roads Reports identified a series of connectivity priorities to support economic growth in the North.

10.2.4 Seven corridors are identified across different modes (and multi modes) of transport, three of which are relevant to the Tees Valley and Darlington Borough.

1. Connecting the Energy Coasts (Multi-Modal) - This corridor seeks to enhance the strategic connectivity, for people and goods, between the advanced manufacturing and energy generation research centres and assets. This is crucial to support the transformational growth potential within this economic area. For Darlington improvements to the east-west linkages for both road and rail are key considerations relating to this corridor.

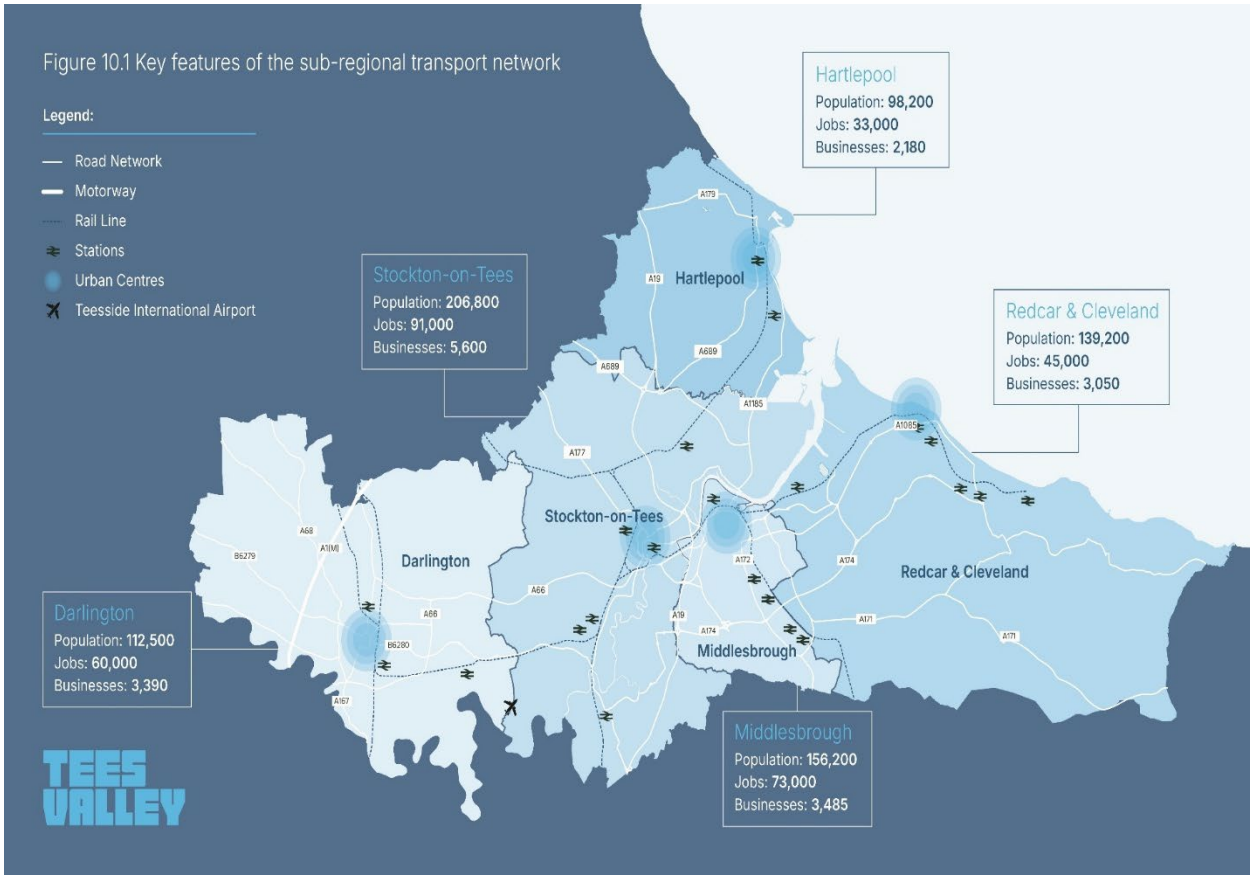
2. East Coast to Scotland (Rail) - Strengthening rail connectivity and capacity along the East Coast Main Line and other key parallel rail lines, such as the Durham Coast Line, to provide enhanced strategic and local connectivity in the North East, Tees Valley, East Riding and North Yorkshire. The strategy identifies that investment is required at rail stations, including Darlington, to increase capacity, promote economic growth, and make the most of the opportunities provided by high-speed rail services.

3. Yorkshire to Scotland (Road) - This road corridor looks to strengthen and complement the East Coast Road Corridor to Scotland and examines the transformational requirements to better connect the economic centres (including the Tees Valley) in this corridor beyond the current Road Investment Strategy commitments.

Tees Valley Combined Authority

10.2.5 Within the Tees Valley, Darlington contains many key elements of the sub-regional transport network. Darlington is the point of arrival for those arriving by road via the A1(M) and A66, by air via Teesside International Airport and by rail from Darlington Station on the East Coast Main Line. Figure 10.1 below shows the key features of the sub-regional transport network.

Figure 10.1 Key features of the sub-regional transport network



10.2.6 The Tees Valley Combined Authority (TVCA) drives economic growth and job creation and is the strategic transport authority. The five Tees Valley local authorities work closely with the business community and other partners to make local decisions to support the growth of our economy.

Under the devolution deal with the government TVCA have taken on responsibilities previously held by central government to enable investment decisions to be made locally based on the priorities of communities and businesses in the Tees Valley.

10.2.7 The Tees Valley Combined Authorities' Strategic Economic Plan (SEP)[70] identifies the aim to unlock future growth is being 'to be better connected'. It is identified within the document that there is a need to improve road and rail connectivity for the region, so that Tees Valley businesses can access UK and European supply chains, particularly in the North, and that Tees Valley residents can benefit from job opportunities. Four priorities for delivering new transport infrastructure across the Tees Valley are also identified within the SEP. Including the Darlington Station Improvement Project that has seen new platforms delivered to enhance rail services. A second of these priorities within Darlington is to improve east-west road connectivity to provide a high quality, resilient corridor along the A66 from the A1(M) to the international gateway at Teesport.

10.2.8 In addition, the devolution deal recognises Tees Valley's ambitions to continue to strengthen the bus network and the relationship and influence it has with local bus operators. The options to achieve this have now been formalised in legislation in the Bus Services Act 2025.

10.2.9 A Strategic Transport Plan has also been prepared by the TVCA to support the Strategic Economic Plan and sets out how we will improve and invest in the transport network to make this vision a reality. It is aimed at people living and working in the Tees Valley, as well as business owners, developers, Government, partner organisations and investors. The Strategic Transport Plan was adopted in January 2020.

10.2.10 In preparing the Strategic Transport Plan, a framework was developed based upon five themes, which are closely linked together and will all require improvement in order to meet the overall transport vision of Tees Valley. The five key themes are:

1. National Rail;
2. Major Roads;
3. Connecting Centres;
4. Supporting Economic Growth;
5. Local Journeys.

10.2.11 To support the Strategic Transport Plan itself, a series of supporting documents have been prepared which go into more detail on the current and future issues, and the interventions needed, across the five themes

[70] Tees Valley Strategic Economic Plan: The Industrial Strategy for Tees Valley 2016-2026, TVCA.

listed above.

Darlington Borough

10.2.12 Adopted in March 2023 the Darlington Transport Plan (DTP) supports the delivery of the Tees Valley Strategic Transport Plan (STP). The delivery of the STP has been further developed in the City Region Sustainable Transport Settlement (CRSTS) agreed with the Department for Transport. This provided funding over five years and a clear prioritization of decarbonisation, and economic growth.

10.2.13 The DTP identifies the following five objectives:

1. Reduce transport's impact on the environment and support health and wellbeing;
2. Improve safety for all road users;
3. Connect people with job and training opportunities and link communities;
4. Support a revitalized and transformed Darlington town centre;
5. Maintain and effectively manage a resilient transport system.

10.2.14 A good transport network contributes to the ambitions in the Council Plan by providing sustainable and accessible transport to meet the needs of a growing town.

Walking and Cycling

10.3.1 Providing convenient access to attractive and efficient pedestrian and cycle routes makes a major contribution to achieving sustainability and transport objectives as well as improving health and wellbeing by being active. Pedestrian and cycle routes for everyday journeys to schools and local shops are essential.

10.3.2 For cycling, National Cycle Network Route 14 has been developed between Darlington and Stockton towards Hartlepool and onwards to South Tyneside Regional Route 165 which runs inside the southern edge of the Borough from Barnard Castle to Whitby. Cycle infrastructure towards Durham is in place with a route to Newton Aycliffe. Any future improvements in this area will be safeguarded, promoted and developed as necessary.

10.3.3 The Borough's network of public rights of way, including permissive routes, provides an important sustainable, 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 important role in ensuring the physical and mental health and wellbeing of residents as well as contributing to the Borough's visitor offer.

10.3.4 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 inclusively designed facilities such as signage. Developments that 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 of the existing routes. 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.

10.3.5 New walking and cycling provision is identified in the Tees Valley Local Cycling and Walking Infrastructure Plan, Rights of Way Improvement Plan, Darlington's Green Infrastructure Strategy, and is covered by Policy ENV 4. These corridors have a key role to play in improving connectivity, particularly to the town centre, for pedestrians and cyclists.

10.3.6 Walking and cycling routes must, wherever possible, be integrated with other modes both in terms of access and connectivity and be associated with green infrastructure and public realm. New developments must provide inclusive access for all with specific regard to facilitating independence for elderly people and the disabled and providing safe and attractive routes to school and other required infrastructure. In common with roads, streets, green infrastructure and public spaces, natural surveillance should be achieved by overlooking, active frontages, good connectivity and through routes.

10.3.7 Developments identified in Policy H 2 Housing Allocations and Policy E 2 Promotion of New Employment Opportunities will also be required to provide a connected walking and cycling network which may also include the protection, improvement or rerouting of existing provision if appropriate. These include, but are not limited to:

- The Stockton and Darlington Railway - this is unique in the national context and is of national and international significance as reflected in the high number of designated and non-designated assets along its 26-mile route;
- Route to Hurworth - There are a number of options to create a useable route including using the track bed of the old railway line;
- Route to Heighington; to the north of Darlington lies the village of Heighington which is not directly connected to Darlington for cyclists.

Rail Network

10.4.1 Darlington is the main interchange hub in the Tees Valley as an East Coast Mainline and Transpennine Station making it a 'gateway' for national and pan northern rail journeys into and out of the Tees Valley. In 2024/25 over 2.8 million passenger entries and exits were recorded at Darlington station.

10.4.2 However, in comparison to its excellent north-south connectivity, Darlington is relatively inaccessible from other key centres within the Tees Valley and from nearby employment areas of South Durham via the Bishop Line. Journey times to Darlington from Middlesbrough and Stockton (as adjacent key centres) are improving, taking between 26-28 minutes which is comparable with car travel, however there are currently no direct train services from Stockton or Hartlepool to Darlington. The service is currently operated every 30 minutes with aspirations to a 15 minute frequency through to Saltburn. This relatively poor east-west connectivity by rail within the Tees Valley impacts on the external connectivity of the Tees Valley as a whole, reducing the attractiveness of the excellent north-south links from Darlington to potential users from the rest of the Tees Valley. The improvements at Darlington Station are designed to remove the capacity issue constraint to enhancing these local rail links.

10.4.3 Darlington to Bishop Auckland by train is around a 27 minute journey but is only operated on an hourly service. There are ambitions to increase this to a half hourly service.

10.4.4 Given the predicted increase in car ownership[71] in the Tees Valley and the advantage of car journey times, increased trips are forecast on the road network. Therefore, improvements to local as well as long distance rail services are sought by 2042.

10.4.5 Ensuring that rail freight can move easily to and from Teesport will be an important issue during the Local Plan period. For example, the operation of the Hitachi train manufacturing at Newton Aycliffe is identified as being one of the key employment opportunities in the North East and it is intended that components and other supplies required by the plant are transported by rail as often as possible. For the site to be well served by rail from Teesport, that is an important port in the North East and the fifth largest in the UK, and it handled 35 million tonnes of cargo in 2015[72].

Creating a more efficient rail network

10.4.6 Working in partnership with the Combined Authority, Network Rail and LNER, significant investment is currently being made into Darlington Station providing two new platforms on the Eastern side of the station and a new, fully accessible and enclosed footbridge linking them to the current station building.

10.4.7 New cycle lanes will also be introduced, with bike shelters and a multi-storey car park which will adjoin the new station building. The car park will include secure parking for over 600 cars, including accessible parking bays and electric car charging points.

10.4.8 The Council, working with TVCA and other local authorities along the route of the East Coast Main Line continue to work collaboratively to ensure that investment in rail continues. This investment is seen as essential to improve journey times, service reliability, service frequency and the line capacity that is

[71] Road Traffic Forecasts 2015, Department for Transport, March 2015.

[72] Tees Valley Strategic Economic Plan (SEP).

needed to support the movement of people and freight envisaged for Darlington and the Tees Valley, as set out in Darlington's Economic Strategy and the Tees Valley Strategic Economic Plan. The local authorities are keen to have a strong partnership with the rail industry, to create a vision for, and the strategic development of, the ECML and connecting services and routes, both for passengers and freight that builds on the improvements and investment that has already taken place at Darlington Station, including the new footbridge, public realm as well as the improvements at the station to increase rail capacity.

Road Network

10.5.1 The main north-south road links to the Tees Valley are provided by the A1(M), a key national motorway network link for the west of the Tees Valley, while the east of the City Region is served by the A19(T). The main east-west links are provided by the A66(T) and A174(T). In Darlington, the priorities are to improve key junctions serving the area from the A66(T) Darlington Bypass and the A1(M) to avoid levels of predicted traffic congestion that will prevent regeneration of employment areas.

10.5.2 Whilst the Local Plan has been developed on the basis of ensuring that developments are in locations where sustainable transport options are available, motor vehicle traffic is an important consideration. It is therefore important that the road network is managed in a way that ensures that it continues to function, facilitates our aspirations for economic growth and accommodates the needs of pedestrians, cyclists, public transport users and other highway users.

10.5.3 In doing this, the transport interventions need to:

1. Facilitate more jobs and homes without creating unsustainable levels of traffic congestion on the highway network;

2. Effectively manage the demand for roadspace from all types of transport;

3. Provide people with the ability to travel to training, jobs and other important services; and

4. Improve Darlington's strategic links so that the economic benefits can be realized within the Borough and wider Tees Valley.

Creating a more Sustainable Road Network (including improvement to bus services & new road based transport technologies)

10.5.4 The road network is a vital part of the Strategic Transport Plan and the Darlington Transport Plan as it is essential that it functions efficiently for the movement of all traffic by all modes. The local road network is essential for walking, wheeling and cycling as well as public transport.

10.5.5 The continued growth of the economy should also take into account the use of all modes of transport and not just car-based transport. Research has shown

that the lack of public transport can lead to jobs being turned down by unemployed people. Bus networks in England are estimated to generate over £2.5bn in economic benefits – around £1.3bn reflect user benefits from access to jobs, training, shopping and leisure opportunities. The remaining £1.2bn of benefits accrue to other transport users and society at large, through reduction in congestion, reduced pollution, lower accident rates, improved productivity and the stand-by value of bus networks.

10.5.6 New development planned across the region will add significantly to trips on the strategic and local highway networks. Interventions will be required to mitigate the effects particularly in relation to congestion and highway safety.

Strategic road network

10.5.7 The strategic roads through the Borough (A1(M) and A66(T)) are forecast to see traffic growth during the plan period, as a result of background traffic growth and traffic generated by specific proposed new developments. Improvement works at the following locations on the strategic highway network are likely to be considered within the plan period:

- A1(M) Junction 58 (Faverdale)
- A1(M) Junction 59 (Newton Aycliffe)
- A66(T) Morton Palms – Junction with Yarm Road
- A66(T) Great Burdon
- A66(T) Blands Corner
- A66(T) Neasham Road (Arena) roundabout.

10.5.8 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 currently proposed to safeguard further and that could be designated as highway in the future. The Council works collaboratively with National Highways and other Tees Valley Local Authorities to identify improvements for the Tees Valley. Schemes identified will become contenders for funding. In addition major developments within the vicinity of these schemes may be required to contribute towards them in the form of developer contributions.

10.5.9 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.

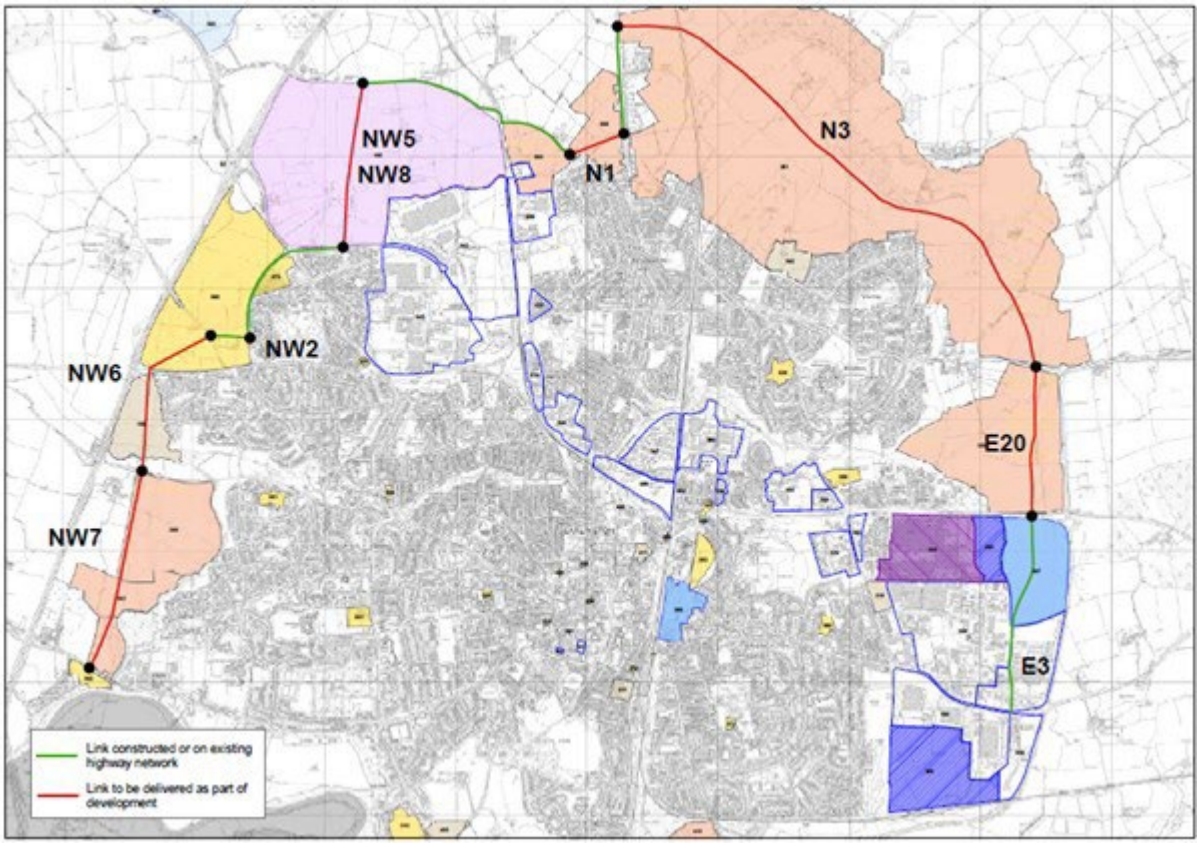
Local highway network extensions and improvements

10.5.10 The highway schemes detailed in Policy IN1 part C(vi) are intended to serve a dual function in creating access to development sites but also providing travel choices

for local trips. Through creating an interconnected orbital route this will improve connectivity for all modes of transport to the North of Darlington. These routes will be integrated into proposals for relevant sites and provide access to the development by road (including where appropriate public transport), cycleway and footway.

10.5.11 Figure 10.2 shows the sections of network already in place and those requiring delivery during the plan period.

Figure 10.2 Existing and Proposed Sustainable Transport Links



10.5.12 The schemes detailed in Policy IN1 and Figure 10.2 are from West to East:

- Coniscliffe Park (NW7) – link road connecting A67 to Staindrop Road;
- Stag House Farm (NW6) – link road connecting Newton Lane to Staindrop Road;
- ~~Faverdale~~ Burtree Allocation ~~link road~~ (NW5/NW8) link road connecting Burtree Lane to Rotary Way;
- Berrymead Farm (N1) – connecting Burtree Lane to the A167 and improvements to A167/Burtree Lane junction;

- Skerningham Allocation ~~access roads~~ (N3) – including access and local distributor road between the A167 and A1150 close to the Little Burton roundabout in the broad location identified in the Skerningham Masterplan Framework;

- Burdon Hill (E20) – link road connecting A1150 to B6279 Tornado Way and new link road to Red Hall and Skerningham access roads.

10.5.13 Two new link roads have already been constructed to support development proposals:-

- West Park ~~Link Road~~ (NW2) – This link road connects West Park ~~Garden Village~~ with Newton Lane and forms part of a longer route that will ultimately connect the A67 with the A68.

- Symmetry ~~Park Link Road~~ (E3) – This link road provides a parallel route to the A66 connecting the B6279 Tornado Way with B6280 Yarm Road.

10.5.14 The Council also remains committed to mitigating congestion locations around the Borough that may also include providing infrastructure, such as cycleways, to increase mode choice for local trips and contributing to reducing congestion. As these works can generally be achieved within the existing highway, no land safeguarding for these schemes is required.

10.5.15 The Darlington Transport Plan advocates a strong public transport network and in Darlington much of this is provided by buses. Key bus corridors are identified to ensure improvements can be introduced to manage punctuality and reduce bus journey times. In addition bus services also operate on marginal routes that sees a greater public transport offer for opportunities for employment.

10.5.16 The Council works in partnership with Bus Operators, TVCA and other local authorities in an enhanced partnership to deliver the vision and strategy for bus service, and infrastructure improvements focusing on benefits to passengers and access to a regular bus service remains a key policy for development, leading to a fully commercial bus network and service. This is key in the selection of sites to be developed, the design of the road network to serve new developments and to enable buses to serve their customers.

10.5.17 In 2021 TVCA published the first Tees Valley Bus Service Improvement Plan. This has subsequently been updated with the most recent version published in 2024. At its core is a 5-point plan for improving bus provision in the Tees Valley:

1. Sustainable network for the future;
2. Bus priority improvements;
3. Improved fare offer;
4. Enhanced customer experience
5. Decarbonising the bus fleet.

Local Plan Highway Modelling

10.5.18 Extensive highway modelling was undertaken in support of the currently adopted Darlington Local Plan 2016-2036 in relation to the significant new

allocations within the plan. Although most allocations remain unaltered further work will be undertaken to understand the impact of the proposals in this plan review prior to submission.

10.5.19 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

10.5.25 The detailed traffic modelling indicates that the development within the Local Plan does not have a severe impact on the local strategic highway network subject to the schemes identified in the Infrastructure Delivery Plan being implemented.

Improving Access and Accessibility

10.6.1 Development that offers better access to all modes of travel helps the Borough to become more sustainable, healthy, green and prosperous. Sustainable modes of travel such as walking, wheeling, cycling, public transport and facilities for zero emission vehicles will be promoted through travel planning as well as good design.

Policy IN 2

Improving Access and Accessibility (Strategic Policy)

The Council expects development to promote accessibility and permeability by creating places that are well connected with each other and with existing transport networks. The needs of pedestrians, cyclists, bus and rail users, as well as those with specific needs should be prioritised to reduce the need for travel by private vehicle.

Development will be appropriately located to reduce the need to travel by car and the number and length of car trips made to access local amenities.

In order to improve access and accessibility during the plan period:

a. Proposals for new buildings or the change of use or alteration of existing buildings to which the general public and employees have access will be required to provide suitable access and facilities, particularly for people with mobility issues.

b. Ensure that all new developments are permeable and legible by providing high quality, safe and easily accessible walking, wheeling and cycling routes to current standards, with roads designed to 20mph speed limits within residential developments.

c. All new developments will provide good connectivity for pedestrians and cyclists to make walking, wheeling and cycling the first choice for short journeys to local services such as shops, particularly those selling fresh food, schools, primary

health care, employment and leisure opportunities, including accessing the public right of way network. It should be ensured that the routes are attractive and in accordance with relevant guidance and following principles set out by strategic agencies such as Active Travel England.

d. All new major development should be accessible by public transport. It is therefore expected that 80% or more of dwellings on a site will be within a 400 metre walking distance of a bus stop served by a regular daytime service (at least every 30 minutes). Where appropriate, financial contributions to provide a supported or extended bus service for up to 5 years, and bus stop infrastructure will be sought where sites are not currently served by regular services.

e. Contributions will be sought from all developments, where considered appropriate and/or necessary, for the following sustainable travel measures:

- Provision of regular bus services and infrastructure in locations that is not served by public transport;
- Safer Routes to School;
- Measures to support the delivery of the Travel Plan (Policy IN 3);
- Public Rights of Way improvements;
- Walking and Cycling network improvements required to the wider network, for which a contribution will be sought on the following basis:

Residential Development - Per Dwelling £				
	1 bed	2 bed	3 bed	4 bed +
Town centre, Local Service and Transport Node	£300	£600	£900	£1200
Remaining urban area	£375	£750	£1125	£1500
Rural area	£450	£900	£1350	£1800
Non-residential Development - Per car parking space cost				
Town centre, Local Service and Transport Node	£300			
Elsewhere in the Borough	£600			

10.6.2 Darlington has a well-developed cycle network including over 40 kilometres of dedicated off road cycle routes based around seven radial routes which start in the town centre and end in various locations on the edge of the urban area.

These routes link major employment sites to the main residential areas within the town. The routes are signed using specially approved cycle signs which show typical cycle times rather than distances and are colour coded depending on the route. There is also a circular route which connects the main radial routes to each other and provides a longer leisure route for cyclists. Work in recent years has focused on connecting rural communities to the urban areas of Darlington and also connecting to County Durham in the north where a significant number of commuter journeys begin or end. The Borough already has an extensive network of cycle routes, but the contributions outlined in Policy IN2 will be used to provide high quality infrastructure to make cycling a more attractive option compared to the private car. Larger employers, particularly within the urban area, will therefore be encouraged to provide facilities such as secure cycle parking, changing and showering facilities, where practicable.

For larger strategic sites delivered across extended periods of the plan, the considered need for planning obligations relating to sustainable travel will take account of the work delivered to date on infrastructure delivery and previously agreed planning obligations. It will also account of the delivery of active travel measures within allocations which create a new community with access to new schools, retail and other services.

10.6.3 In 2022 the Government introduced a new agency, Active Travel England who have a responsibility for making walking, wheeling and cycling the preferred choice for people to get around towns and cities. As part of any new routes the Council follows the latest Government guidance and follows the Active Travel England process to ensure that the infrastructure is useable and accessible and promotes the active travel choice.

10.6.4 Whilst most roads have an adjacent footway the Public Rights of Way network[73] provides a comprehensive network of footpaths and bridleways in both the urban and rural areas. There are however still gaps in Public Rights of Way around the Borough, meaning it is difficult to connect to other modes of transport such as rail or bus. During the plan period, the Council will seek to improve these connections particularly where they are poor, near to proposed development. New development should provide walking, wheeling and cycling links into existing residential, leisure, retail and commercial developments to improve connectivity and permeability.

10.6.5 Major developments that are not within a 400m walking distance of existing bus services will be expected to contribute to provide a supported bus service for 5 years. Material considerations will be taken into account at the planning application stage including the distance to local services by non-vehicular traffic, such as walking, wheeling or cycling and the frequency of existing bus services on routes further than 400m away and the likelihood, or otherwise, that a supported service will become commercially viable.

10.6.6 The creation of safe, convenient and inclusive access to all buildings and public spaces is also a priority to help ensure that everyone can help create and benefit

[73] Including Public Footpaths, Bridleways and Byways

from a more prosperous Darlington[74].

10.6.7 The town is well served by a commercial and supported bus network. The commercial network comprises of a number of key routes which typically have between 2 and 4 buses per hour. The supported services routes provide half hourly or hourly services to areas of the borough that are not served commercially. Together these services provide a comprehensive bus service.

10.6.8 Darlington has good rail connections to national and sub-regional services utilising East Coast Mainline and trans-pennine routes. There are limited communities that are directly served by train services for local trips, however there are opportunities for growth in local train journeys, particularly at Dinsdale Station which serves Middleton St George and also at North Road Station.

Transport Assessments and Travel Plans

10.7.1 In accordance with National Policy development proposals that are likely to generate significant additional journeys should be accompanied by a Transport Assessment and a Travel Plan whilst smaller developments may require Transport Statements.

[74] One Darlington: Perfectly Placed Community Strategy 2008/2026, Revised May 2014

Policy IN 3

Transport Assessments and Travel Plans (Strategic Policy)

The Local Planning Authority will require the preparation and implementation of Travel Plans, Transport Assessments and other schemes and agreements to promote the use of sustainable transport for journeys to work, training and education. Proposals that have potential significant impacts should be accompanied by a Travel Plan where appropriate.

Major developments will be required to engage in the Travel Planning process and produce a Transport Assessment. Proposals will be supported that:

a. Improve transport choice through the provision of information and encouragement to maximise opportunities to travel sustainably;

b. Minimise the number of single occupancy vehicle trips generated by the development;

c. Contribute positively to managing congestion, reducing environmental impact and maintaining safety.

Travel Plans must be iterative documents which must be site specific and guided by a framework of common principles and components. Travel Plans ~~must be prepared in line with~~ should have regard to the Council's latest Travel Plan ~~Policy~~ Guidance 2024 Document (or subsequent replacement).

A framework Travel Plan will be appropriate where there is no identified end user or there will be multi-occupancy of a site. Each organisation within a development will be expected to produce a site specific Travel Plan.

Travel Plans should identify the specific required outcomes, targets and measures, and set out clear future monitoring and management arrangements all of which should be proportionate. They should also consider what additional measures may be required to offset unacceptable impacts if the targets should not be met. A travel plan co-ordinator should be appointed to identify opportunities for the effective promotion and delivery of sustainable transport initiatives and to fulfil the management and monitoring requirements. The Council will work with businesses and specifically the travel plan co-ordinators to ensure the travel plans are being developed, maintained and monitored.

10.7.2 The Borough has effective sustainable transport networks and the council are committed to improve this network as part of development proposals. The promotion of Travel Plans is essential to encourage residents and employees to use these networks and to inform them of the travel choices available. Key elements include the marketing of public transport, cycling, walking and the provision of charging points for electric cars and the promotion of car sharing in trying to influence travel behaviour.

10.7.3 Complementary public transport, cycling and pedestrian initiatives to larger scale developments should be delivered through Travel Assessment/Travel Plan agreements between operators, developers, planning and transport authorities.

Parking Provision

10.8.1 The provision of high-quality parking for motorised vehicles throughout the Borough is seen as crucial in keeping Darlington as a competitive place to do business, whilst maintaining the environment that makes for its high quality of life.

10.8.2 National policy[75] requires local authorities to consider setting local parking standards for new development and to ensure there is an improved quality of parking in town centres that is convenient, safe and secure.

Policy IN 4

Parking Provision including Electric Vehicle Charging

In addition to supporting and facilitating the use of sustainable transport modes, the Council will continue to ensure there is an adequate supply of safe, secure and convenient public parking for vehicles within and adjacent to the town centre.

Throughout the Borough, new development (including change of use) will be required to provide safe and secure space for vehicle parking and servicing within the site. Provision should be made for residents, employees, customers, deliveries, visitors and others who may visit the premises, including people with disabilities. The number of spaces provided and the nature of the provision (including provision for motor cycle parking) will have regard to local circumstances and the standards set out in the Tees Valley Highway Design Guide or any successor.

Safe, secure and appropriate provision for cycle parking storage, and where appropriate changing and showering facilities will be encouraged, having regard to standards set out in the Tees Valley Highway Design Guide or any successor within all new developments including shared facilities within flats.

New residential properties and non-residential development are required to provide suitable electric vehicle charge points. These charge points must be located so that they are convenient, useable and when in use, do not cause vehicles to obstruct or impact highway safety.

10.8.3 Local parking standards for new development and changes of use are set out in the Tees Valley Highway Design Guide.

10.8.4 The adopted Parking Strategy proposes a zonal approach to provide enough convenient parking options to support the vitality and viability of the Town Centre. Within the inner ring road, parking will generally be short stay for shoppers and visitors to the town centre. Outside of the inner ring road existing parking provision will generally be protected for long stay parking and Residents

[75] NPPF Paragraphs 107 and 108 (July 2021).

Parking Zones, unless part of a wider regeneration scheme.

10.8.5 The Council will continue to support and facilitate sustainable development of businesses in the town centre by offering contract parking for operational needs to businesses with more than 5 employees who have a suitable employee travel plan in place. This initiative recognises that businesses located in the town centre can be more sustainable in terms of the transport movements that they generate yet need convenient parking for operational purposes to keep commercially competitive.

10.8.6 Developments should provide electric vehicle charge points in locations where it can be accessed and used without impacting on highway safety. In residential areas, cables should not be left to trail across the highway and off-road parking spaces with electric vehicle charge points should be of sufficient size and design including dropped kerbs to allow a vehicle to access the parking space and charge, without impacting on adjacent parking spaces.

10.8.7 In non-residential areas electric vehicle charging in car parks should be provided in locations that will not impact on highway safety, including allowing cables to be trailed across the highway.

Airport Safety

10.9.1 Teesside International Airport is recognised by the Council as essential to the economic performance of the Tees Valley, and to Darlington Borough. It is identified as a strategic location for airport-related employment uses in Policy E 2 'Employment Allocations (Strategic Policy)'.

10.9.2 The airport is a civil aerodrome of importance to the national air transport system[(76)]. As such, the capacity of the airport to operate safely is protected by land use planning restrictions placed on the surrounding area. These include requirements to consult with the airport operator for proposed developments above a particular height or with certain other characteristics that may create a hazard for aircraft using the airport, if proposed developments are within identified zones (as detailed on map at APPENDIX D). Examples are developments likely to attract birds, developments with lights that could distract or confuse pilots, or developments that reflect, diffract or otherwise interfere with the radio signals used at the airport. Wind turbines can also have a distracting effect on radar, so the operator of Teesside International Airport and the Ministry of Defence will be consulted on all applications for wind turbines measuring 11 metres or more from ground to blade tip, or with a rotor diameter of 2 metres or more.

10.9.3 The airport also has an associated Public Safety Zone at the south-western end of the runway. This is indicated on the map at APPENDIX D and shown on the policies map, as required by Government policy[(77)]. Various types of development will not be permitted in a Public Safety Zone if it increases the number of people living, working or congregating within the Zone and, over time,

[76] Joint ODPM/DFT Circular 01/2003

[77] DFT Circular 01/2010.

the number should be reduced, as circumstances allow.

Policy IN 5

Airport Safety (Strategic Policy)

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.

Physical Infrastructure

10.10.1 The term 'physical infrastructure' embraces all services necessary for any development, including water supply, wastewater and its treatment, energy and telecommunications. In this document, transport infrastructure is addressed separately in Policy IN 1, flood risk and Sustainable Drainage Systems (SuDS) in Policy DC 2.

10.10.2 National planning policy requires the Council to identify priorities for infrastructure provision, including the need for strategic infrastructure and to support the expansion of high-quality electronic communications networks, including telecommunications and high speed broadband. The Darlington Local Plan encourages enhanced infrastructure provision that supports delivery of its vision and objectives.

10.10.3 Tees Valley Combined Authority (Formerly Tees Valley Unlimited) prepared a Strategic Infrastructure Plan (SIP)[78], the conclusions of which inform this section. The SIP considers infrastructure themes which impact upon Tees Valley's strategic sites including utilities, flood risk, energy and broadband. Further detail will be provided in the Infrastructure Delivery Plan to accompany the submission of the Local Plan.

Utilities Infrastructure

10.10.4 The Council has consulted the utility companies to ensure there is sufficient capacity in existing infrastructure for the housing, employment and other growth proposed in the Local Plan.

10.10.5 Electricity and gas distribution strategic networks have sufficient existing capacity for most of the development requirements in the Borough during the plan period. However, for some larger strategic sites such as Skerningham,

[78] Tees Valley Strategic Infrastructure Plan, TVU, November 2014.

investment will be needed to provide an enlarged local distribution network. Sufficient water supply is guaranteed over the plan period owing to the large Northern England supply base through local reservoirs. Within the Borough the Stressholme sewage treatment works currently has sufficient capacity within ~~current~~ the discharge consent limits to accept and treat additional waste water flows from the proposed housing and employment allocations. Northumbrian Water has indicated their intention to increase capacity at Stressholme waste water treatments works from 2030. Again, for larger strategic sites new sewer system extensions would be required within the Local Plan period.

10.10.6 Unlike other infrastructure, the Council cannot seek planning contributions for utilities, as this type of infrastructure is delivered by others. It is therefore necessary to ensure that developments are accompanied by the utilities required to support the development at the time it is built, to ensure there is no net negative impact on the operation of existing networks.

10.10.7 All utilities companies have identified early consultation with potential developers as an important requirement in identifying the need for any reinforcement or upgrading of their infrastructure networks. Before submitting a planning application, those applying for new development or intensification of use will be expected to contact all the relevant utilities providers and regulatory bodies to ascertain how their development can be accommodated.

10.10.8 Future capacity is unlikely to present a barrier to major industrial, business and residential developments provided sufficient notice is given to utilities companies and therefore no specific planning policies to enable or facilitate improvements to physical infrastructure networks are required.

10.10.9 The Council will work in partnership with utility companies to ensure infrastructure networks continue to accommodate growth and support economic development.

Policy IN 6

Utilities Infrastructure (Strategic Policy)

Proposals for new development must be capable of being accommodated by existing or planned utilities (whether supplied by utilities providers or the development itself) and should not:

a. Have a net negative impact on the operation of existing utilities networks; or

b. Worsen the services or protection from risk enjoyed by the existing community.

Utilities include gas, electricity, off-site service infrastructure, surface water management, sewage disposal, flood risk defences and flood control facilities.

Telecommunication Infrastructure

10.10.10 Telecommunication infrastructure entails fixed and mobile telephony infrastructure and provisions for fixed and mobile broadband infrastructure, providing better telecommunication infrastructure whilst ensuring there are no significant adverse amenity or public safety impacts.

10.10.11 High quality advanced communications infrastructure is essential for sustainable economic growth. Whilst communications networks in the Borough need to be expanded and upgraded, the way this expansion is carried out should have due regard to public safety and visual amenity.

Policy IN 7

Telecommunication Masts

Development of electronic communications infrastructure will be permitted provided proposals meet the following criteria:

a. Siting and appearance of proposed apparatus and associated structures seeks to minimise impact on the visual amenity, character and appearance of the surrounding area;

b. If located on a building, apparatus and associated structures should be sited and designed in order to minimise impacts to the external appearance of the host building;

c. If proposing a new mast, it should be demonstrated that the applicant has explored the possibilities of erecting apparatus on existing buildings, masts and other structures - such evidence should accompany any application made;

d. Development should not have an unacceptable effect on areas of ecological interest, landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

e. It is not harmful to visual or aural amenity or the safety of highway users and does not interfere with air traffic equipment.

10.10.12 Progression of speed and quality in mobile phone technology with aspirations for future 5G networks will see the renewal of current telecommunication mast infrastructure suitable for 3G / 4G services in Darlington Borough over the plan period. The Council is keen to facilitate such improvements to support quality of life for citizens and facilitate business growth. In line with national policy[79] we seek to support mast and asset sharing, network convergence and support siting of equipment on tall buildings and structures to support data speed and reception.

[79] UK's Electronic Communications Code based on the Digital Economy Act , OFCOM / DCMS 2017.

10.10.13 Evidence will also be required to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, such as air traffic services.

Broadband Infrastructure

10.10.14 In the last ten years Darlington's broadband fibre infrastructure network has been significantly improved by commercially driven upgrades from Openreach and Virgin Media and the impact of the government funded Broadband Delivery UK (BDUK) programme in urban and rural Darlington.

10.10.15 The public funded Digital Durham BDUK programme phases enhanced broadband speed capability for the Tees Valley Combined Authority and other authorities in the North East since 2014. However, whilst gigabit capable broadband accessibility[80] in Darlington has significantly improved, several strategic housing and employment development sites have not yet been connected to futureproof broadband infrastructure altogether.

10.10.16 Broadband provision is now seen in the UK as the 4th utility and citizens are now able to demand access to minimum speeds by providers through the Governments Universal Service Obligation (USO) scheme which commenced March 2020.

Policy IN 8

Broadband Infrastructure (Strategic Policy)

Development proposals for housing sites of more than 50 homes and employment sites of more than 0.5 ha must ensure that gigabit capable broadband connectivity (or suitable alternative) and ducts are provided for the development.

10.10.17 The Council will ensure with developers that future broadband infrastructure provision in larger housing and employment sites will be identified and provision gaps are closed within the planning application process (and may include appropriate planning conditions) of these developments.

10.10.18 This includes several strategic housing development locations and new employment allocations such as Skerningham ~~Garden Village~~ (Policy H 10) and Burtree ~~Garden Village~~ (Policy H 11). For Rural Areas of the Borough public funding from TVCA and BDUK[81] will be utilised to increase gigabit capable broadband coverage in the Tees Valley.

[80] Gigabit capable broadband = Fast internet speeds to 1 gigabit + through establishment of fibre networks

[81] BDUK Superfast Extension Phase 2 + 3 2017-2024 and BDUK Project Gigabit.

Renewable Energy Infrastructure

10.10.19 Renewable Energy Infrastructure supports the mitigation of Climate Change and supports smart energy systems and energy flexibility. The council supports carbon neutral solutions and the overall reduction of carbon emissions throughout the development process.

10.10.20 The types of renewable and energy efficient infrastructure which are deemed applicable include:

- Wind Energy
- Solar Energy
- Hydro Power

10.10.21 One of the key aims of the Local Plan is to reduce energy use and carbon emissions. Appliances like industrial and new domestic scale renewable installations feeding into the electricity grid through existing connections, electric vehicles and heat pumps are anticipated to impact on supporting renewable or efficient energy solutions and reducing carbon emissions.

Policy IN 9

Renewable Energy Infrastructure (Strategic Policy)

Renewable and low carbon energy development including small scale and community-led initiatives will be supported across the Borough, where proposals are in accordance with the following relevant criteria. In determining planning applications for such projects applicants will not be required to demonstrate the overall need and significant weight will be given to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

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. Residential amenity including shadow flicker and noise;

   ii. visual dominance;

   iii. protected species and habitats;

   iv. landscape character and fabric;

   v. the historic environment, including heritage assets and their settings;

   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 been 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, provided that it is not of higher environmental value;

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 individual and cumulative visual impact on the landscape and the effect of glint and glare on neighbouring uses, highway and aircraft safety;

vii. need for, and visual and landscape impact of security measures such as lighting and fencing.

c. Hydro Power: Applications for hydropower will need to be accompanied by a detailed Flood Risk Assessment. Early engagement should take place with the local planning authority and the Environment Agency.

In considering applications for the re-powering and life-extension of existing renewable sites significant weight will be given to the benefits of utilising an established site.

d. Battery Energy Storage Systems (BESS): Proposals should be carefully sited and adequately mitigate the individual and cumulative visual impact on the landscape including through the retention or creation of locally occurring vegetation. Batteries and inverters should be co-located within existing buildings or structures where possible or new buildings should match with the local character. Proposals for Battery Energy Storage Systems 1MW or over are encouraged to consider the National Fire Chiefs Council BESS guidance and engage with the County Durham & Darlington Fire and Rescue Service before submitting a planning application.

Community and Social Infrastructure

10.11.1 Access to a wide range of good quality community facilities is identified as a key contributor to the health and well-being of people who live and work in the Borough and is one of the key objectives of the Local Plan vision, aims and objectives (Section 2). The timely provision and upgrading of facilities is required to ensure Darlington's future growth brings more prosperity, safety, sustainability and inclusiveness and maintains and improves health and well-being.

Policy IN 10

Supporting the Delivery of Community and Social Infrastructure (Strategic Policy)

A) Education

If need is demonstrated [82] then a planning obligation will be sought to provide additional places or enhance existing educational facilities, based on a calculation of:

- (Pupil place generation per family dwelling)[83] – (existing space capacity in local schools) x (Department of Education (DfE) standard cost per place) [84];

Planning obligations for education provision will not be sought for:

i. Residential developments of 9 units or less;
ii. Non-residential development;
iii. Affordable housing schemes;
iv. Single bed properties;
v. Specialist housing for the elderly (Use Class C2);
vi. Student accommodation (unless if specifically includes provision for families;
vii. Purpose built hostel or holiday accommodation which are incapable of occupation for general residential purposes because of their layout, ownership, management or occupancy restrictions.

Land will be reserved for education uses within the following sites:

- South of Yarm Road in Middleton St George (site 247)
- Land at Berrymead Farm (site 008)
- West Park ~~Garden Village~~ (site 068)
- Coniscliffe Park North (site 249)
- Provision on strategic sites of Skerningham and ~~Greater Faverdale~~ Burtree are dealt with in Policies H 10 and H11.

Such land will be reserved until an agreed trigger point linked to phasing, to be stipulated in a legal agreement prior to the granting of planning permission. If there are no firm plans for the school at that time, the land may be made available for alternative community uses. If none of these can be delivered within a reasonable time (to be agreed in advance), the land may be considered for additional new housing.

B) Health Contributions for GP Provision

In circumstances where sufficient capacity does not exist, developments including 20 or more dwellings will be expected to contribute towards the physical expansion of existing GP practices to meet the additional need generated by the proposal. This should be established in consultation with the North East and North Cumbria Integrated Care Board and be calculated using the step-by-step methodology

[82] The nearest school or ~~another~~ any other school, within 2 miles for primary schools and 3 miles for secondary schools, is operated within 5% of its capacity.

[83] Latest ~~TVCA Pupil Projection Report~~ DBC Pupil Place Planning Projections (currently based on 20 primary places and 12 secondary places per 100 dwellings).

[84] DfE place generation settlement figure as detailed at https://www.gov.uk/government/collections/school-places-scorecards (currently £~~13,115~~ 19,122 per primary place and £~~17,050~~ £26,301 per secondary place).

set out in paragraph 10.11.7 and the inputs provided in the Health Contributions Guidance Note or its replacement.

In circumstances where it is not possible to provide mitigation at existing facilities and the provision of a new GP surgery may be required, or provision included within the development of buildings for wider community use, this will need to be negotiated with the Local Planning Authority in consultation with the North East and North Cumbria Integrated Care Board.

C) Protection of Existing Community Facilities

The loss of any community facilities will only be permitted if it can be demonstrated that:

i. There are sufficient other suitable alternative community facilities either within the neighbourhood or accessible nearby; or

ii. The community facility is no longer needed; or

iii. There is no management and funding resources existing or that could be generated within the local community that could secure and sustain a facility that meets identified needs; or

iv. The community facility cannot be secured or sustained through the partial redevelopment of the site.

D) **Provision of New Community Facilities**

Proposals for new and expanded community services and facilities will be supported in accessible locations providing that the scale of development is appropriate to the area in which it is proposed.

For new indoor sports provision and arts and cultural facilities, priority will be given to new proposals according to the settlement hierarchy set out in the plan. Proposals will be permitted elsewhere if it is demonstrated that:

i. There is a need for it in the location proposed; and

ii. It will be easily accessible by a choice of means of walking, cycling and public transport; and

iii. For arts and cultural facilities that, through market research and/or an impact assessment, it can be shown that there would not be any damaging impact on the vitality and viability of the Town Centre, including the evening economy.

Secure community access, outside of core school hours, will be required for any new provision on education sites.

Education

10.11.1 Access to good schools is critical to the quality of life of residents, and improving it is a key ambition of the Council. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities[85].

[85] NPPF paragraph 100 (December 2024).

10.11.2 The Council has to assess the local need for school places and ensure that every child resident in the Borough can have a place in a state funded school in Darlington[86]. It works with a wide range of education providers, such as Academies[87] and Free Schools[88] to ensure this.

10.11.3 The main planning issue is how to meet any need for additional school places arising from planned housing growth and population change.[89] However, uncertainty around future projections, due to changes in birth rate and fluctuations in build rate of housing developments means that predicting the school place requirement over the entire Plan period is difficult.

10.11.4 It is envisaged that an additional need for school places is likely to arise in the medium to long term where significant new housing is proposed, particularly in the north, north-west and east of the Borough. Following the same strategy of supporting existing schools, expansion of existing school facilities to accommodate additional demand will be considered in the first instance. An updated SOP is currently under preparation that will identify existing schools that will be expanded next.

10.11.5 To ensure new schools can be delivered close to the strategic housing growth areas if they are required, the Skerningham and Burtree ~~Garden Village~~ Strategic Allocations (Policy H 10 and H 11) will safeguard land for future education provision. In addition, land will be safeguarded at Berrymead Farm (site 008), South of Yarm Road in Middleton St George (site 247), Coniscliffe Park North (site 249) and West Park ~~Garden Village~~ (site 068).

Health Contributions for GP Provision

10.11.6 During the plan period a significant proportion of new housing is proposed in north, west and eastern fringes of Darlington. This development will generate additional needs for primary health care. Some GP practices near these areas are already experiencing pressure on patient lists so it is necessary for development to contribute towards the expansion and or creation of premises to accommodate the additional need generated.

10.11.7 For development proposals for 20 dwellings or more the following methodology will be used to firstly determine whether a contribution will be required towards the expansion of an existing GP practice or towards a new

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[86] A High Quality Place for Every Child, School Organisation Plan (SOP) 2013-17, DBC.

[87] State funded schools directly funded by central Government and independent of the Local Authority.

[88] State funded independent schools.

[89] Every 100 new houses is expected, on average, to produce ~~between 18 and~~ 20 primary school age children and ~~13-15~~ 12 pupils of secondary age.

facility. In circumstances where there isn't sufficient capacity to accommodate the additional patients generated by the developments then the remaining steps of the methodology will be used to calculate the additional GP space required and the total contribution required.

Step 1 – Calculate the increased population from the proposed development:
No. of dwellings multiplied by (x) Average Occupancy Rate equals (=) Population Increase

Step 2 – Calculate the new GP List size:
Current GP patient list plus (+) Population increase equals (=) Expected patient list size
(If expected patient list size is less than existing capacity a contribution is not required otherwise continue to Step 3)

Step 3 – Calculate the additional GP space required to support proposed development:
Population increase multiplied by (x) Space Requirement per patient equals (=) Total space (m2) required

Step 4 – Calculate the total contribution required:
Total space required multiplied by (x) Premises Cost equals (=) Financial Contribution

10.11.8 Contributions will be calculated using occupancy rates, current patient list sizes, size and space standards and cost guidance using the methodology in paragraph 10.11.9 above. To determine the expected increase in population to be generated by a development, the number of dwellings proposed should be multiplied by the average household occupancy rate in Darlington.

10.11.9 Once the expected population increase has been identified, this should be added to the relevant current GP patient list to give an overall expected patient size list. If the expected patient list size is within the existing capacity of the relevant surgery, then a contribution is not required. In cases where an application forms part of a wider allocation, existing capacity will be shared proportionately, and contributions sought to reflect this. Similarly, if a development is located within the catchments of more than one surgery, the patient list sizes will be considered as a whole, and contributions shared proportionately.

10.11.10 Using the expected patient size list, the appropriate space requirement per new patient can be identified from using the Premises Maxima Size Schedule. The space requirement per new patient can then be multiplied by the expected population increase to give the total space (m2) required. The total space (m2) required can then be multiplied by the premises cost identified by NHS Property Services to give the final contribution calculation.

10.11.11 The various inputs into the calculations including occupancy rates, current patient list sizes, size and space standards and cost guidance will be routinely updated so these should be obtained from the Health Contributions Guidance Note.

10.11.12 Any contributions collected would be for physical infrastructure only (i.e. new or extensions to physical premises) and not services (i.e. more GPs).

Community facilities

10.11.14 Policy IN 10 seeks to safeguard local services and facilities that meet people's day to day needs. Local shops and other retail outlets are also covered within the policy. This policy covers community centres, village halls, social clubs, children's centres, ~~churches, mosques~~ places of worship and other community resources, such as libraries, which are important for socialising and other community activities. Public houses are also important venues for community engagement and venues to host community activities and are covered in the policy as a community facility.

10.11.15 Many community facilities are experiencing reduced income, arising from either reduced use or reduced public sector or other external funding. Under the Localism Act 2011, the Council is required to maintain a list of community assets[(90)]. This provides certain community groups with an opportunity to protect and preserve local assets of community value. If these assets are put up for sale, in the first instance community groups have the 'right to bid' for them in an attempt to retain the facility[(91)].

10.11.16 The loss of a community facility will be resisted where it is the only remaining facility in a community, where there is an identified need for it, and where a source of funding for ongoing management and maintenance could support the facility. Evidence in support of retaining the last community building must show there is no accessible alternative suitable facility. A 'lack of need' argument would need to be backed up by evidence, e.g. by surveying all community groups in the area, and a 'lack of funding' argument would need evidence that no other community group in the neighbourhood would be prepared to take over the facility. Loss of healthcare facilities will only be supported where they are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan.

Indoor Sports Facilities

[90] Community assets can be land or buildings in public or private ownership.

[91] Darlington Borough Council Policy on The Community Right to Bid for Assets of Community Value.

10.11.17 Indoor sports facilities include swimming pools, sports halls, health and fitness facilities and dance studios, and other specialist provision such as indoor bowls, squash courts, gymnastics centres, boxing gyms and indoor tennis[92]. These facilities can be provided by academies, schools and colleges, private sports clubs, parish councils and at community and village halls.

10.11.18 The policy seeks to protect and where appropriate, enhance a range of quality, accessible and safe facilities, to support more participation in indoor sports and promote healthier lifestyles. In recent years, access to sports facilities at educational sites has improved, as several schools have successfully converted to Academy status and new and improved facilities have been provided, e.g. at Longfield Academy, which has provided a third strategic 'hub' site for indoor sports provision in addition to the Eastbourne Sports Complex and the Dolphin Centre. Improvements to facilities at other key education sites will provide a network of complementary satellite sites for indoor sports provision.

10.11.19 However, access to and quality of existing facilities can be improved further. A key action[93] is to ensure sport and physical activity facilities and spaces (including schools) are available for community use. Although an indoor BMX and skate park has been provided at Faverdale, there is evidence to suggest that not enough specialist sports provision, specifically indoor tennis courts and indoor active play facilities are available in the Borough.

10.11.20 As most indoor sports provision is market led or otherwise outside Local Authority control, quality and access improvements can only be secured through the planning system by attaching conditions to planning permission for extensions, alterations or for new facilities. The policy requires community use to be secured for new provision on educational sites in priority locations.

Arts and Cultural Facilities

10.11.21 The Council's Cultural Strategy (2022-2026)[94] is focussed on maximising the social and economic benefits which art and culture can bring to residents. The Creative Darlington vision identifies arts and culture as being central to Darlington's future identity and economic success. Through bringing people together, the arts have a key role to play in promoting and enabling social inclusion and cohesion. The Town Centre remains a focus for cultural heritage and an ideal setting for cultural activity and events.

10.11.22 Darlington Hippodrome (formerly the Civic Theatre) has, in recent years, had a £13.7m restoration and upgrade that has seen the creation of Theatre Hullabaloo for children. Funding has been provided by Heritage Lottery and Arts Council funding to facilitate these projects.

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[92] as defined in Darlington's ~~Sport and Recreation Facilities~~ Playing Pitch Outdoor and Indoor Sport Strategy (2026).

[93] Darlington Physical Activity Strategy 2025-2035.

[94] Darlington Culture Strategy (2022-2026)

10.11.23 Hopetown Darlington, Darlington's Railway Museum, is another successful facility which promotes the town's distinct heritage. It is also a focus for social and cultural events and activities and played a key role in the celebrations for the 200 year anniversary of the launch of the Stockton and Darlington Railway. The Crown Street Art Gallery is another key venue managed by Creative Darlington, an organisation who encourage the development of arts in the Borough.

10.11.24 Cultural and arts facilities are facing new challenges as income sources, including public sector funding, are increasingly under pressure. It is likely that not all arts and cultural facilities can be sustained through the Plan period, and any new facilities will need to be largely privately provided and supported. It may be possible to sustain some existing provision or to deliver new facilities, by sharing facilities and/or support with other community uses. As recognised within the Creative Darlington vision, the sustained development of the sector will depend on the support, co-ordination and prioritisation across arts organisations.

10.11.25 Cultural and arts facilities are facing new challenges as income sources, including public sector funding, are increasingly under pressure. It is likely that not all arts and cultural facilities can be sustained through the Plan period, and any new facilities will need to be largely privately provided and supported. It may be possible to sustain some existing provision or to deliver new facilities, by sharing facilities and/or support with other community uses. As recognised within the Creative Darlington vision, the sustained development of the sector will depend on the support, co-ordination and prioritisation across arts organisations.

11. MONITORING FRAMEWORK

Policy	Indicator	Target	Source	Responsibility for Delivery
Sustainable Development				
SD 1 Presumption in Favour of Sustainable Development (Strategic Policy)	*(Although in the Local Plan,* *this policy didn't feature in previous monitoring framework table)* Number of schemes approved using sustainable development solutions	Favour schemes containing sustainable development solutions.	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
SD 2 Settlement Hierarchy (Strategic Policy)	Amount of development by type within each settlement	Deliver overall distribution of sites in accordance with the settlement hierarchy	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits),, Development Management Records	DBC
SD 3 Development Limits (Strategic Policy)	Number of developments outside the development limits	No inappropriate housing development	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
Sustainable Design and Climate Change				
DC 1 Sustainable Design Principles (Strategic Policy)	New developments that demonstrate that they accord with the Design of New Development SPD	100% applications accord with Design of New Development SPD	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
Policy	**Indicator**	**Target**	**Source**	**Responsibility for Delivery**
DC 2 Climate Change (Strategic Policy)	Indicator TBC	Target TBC	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC

DC 3 Flood Risk and Water Management (Strategic Policy)	Number of proposals granted consent to Environment Agency advice on flooding	No applications granted contrary to EA advice on flooding	Development Management Records	DBC
Healthy Communities				
HC 1 Health and Wellbeing (Strategic Policy)	Number of proposals granted which support health and wellbeing	Target TBC	Dependent on indicator and target Development Management Records	DBC
HC 2 Safeguarding Amenity	New developments that demonstrate they accord with the Design of New Development SPD	100% applications accord with the Design of New Development SPD	Development Management Records	DBC
HC 3 Hot Food Takeaways	Number of Hot Food Takeaway proposals granted vs refused permission.	Target TBC	Development Management Records, Environmental Health	DBC
HC 4 Gambling Premises	The number of gambling premises granted vs refused permission.	Target TBC	Development Management Records	DBC
HC 5 Skills and Training	*(Although in the Local Plan, this policy didn't feature in previous monitoring framework table)* The number of schemes granted which feature training initiatives	Target TBC	Development Management Records	DBC
Policy	**Indicator**	**Target**	**Source**	**Responsibility for Delivery**
Housing				
H 1 Housing Requirement (Strategic Policy)	Supply of ready to develop housing sites	Maintain a 5 year rolling supply	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Forward Planning, Development Management Records	DBC
H 2 Housing Allocations (Strategic Policy)	Net additional dwellings delivered	Deliver 490 dwellings per annum	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC

H 3 Housing Mix	% of dwellings which category 2 and 3 requirements	~~57%~~ 59% of dwellings will meet Building Regulations Approved Document M category 2 requirements, ~~8%~~ 7% will meet category 3 requirements	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
H 4 Self-Build and Custom Build Housing	% of dwellings on sites of 500 ~~150~~ dwellings or more which are self-build or custom build plots	1% of the housing plots on sites of 500+ ~~150~~ units will be self-build or custom build	Development Management Records, Housing Section	DBC
H 5 Affordable Housing (Strategic Policy)	Number of affordable dwellings delivered	10-30% affordable delivered	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
Policy	**Indicator**	**Target**	**Source**	**Responsibility for Delivery**
H 6 Exception Sites (Strategic Policy)	Number of dwellings delivered through rural and entry-level exception sites	Target TBC	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
H 7 Residential Development in the Countryside (Strategic Policy)	Number of dwellings provided outside of development limits	No dwellings provided unless for agricultural or forestry purposes	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
H 8 Housing Intensification	Number of extra bedrooms in homes of multiple occupation, in accordance with HMO SPD *Needs amending in light of new H9 –* *Number of dwellings refused for back land or garden development*	Number of applications refused	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
H9 Houses in Multiple Occupation (HMO's)	Number of extra bedrooms in homes of multiple occupation	Number of applications approved	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax,	DBC

			site visits), Development Management Records, Housing Section	
H 10 Skerningham Site Allocation (Strategic Policy)	Masterplan agreed by Council	Masterplan agreed prior to applications received	Committee records	DBC
H 11 Burtree Garden Village Site Allocation (Strategic Policy)	Masterplan agreed by planning committee	Masterplan agreed prior to applications received	Committee records	DBC
H 12 Gypsy and Traveller Accommodation (Strategic Policy)	Net additional traveller pitches permitted (permanent of transit)	To meet identified demand	Development Management Records, Planning Policy Monitoring	DBC
Policy	**Indicator**	**Target**	**Source**	**Responsibility for Delivery**
Employment for Economic Growth				
E 1 Safeguarding Existing Employment Land (Strategic Policy)	Safeguard existing employment land	No net loss of existing employment land/buildings to other uses	Development Management Records	DBC
E 2 Employment Allocations (Strategic Policy)	Amount of vacant employment land available for development type: a. Allocated b. With planning consent	Amount and type of employment provision delivered (unit floorspace and site size)	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
E 3 Economic Development in Open Countryside (Strategic Policy)	Amount of development permitted in the open countryside	Development limited to appropriate development	Planning Policy Monitoring (using trusted sources eg Building Control, NHBC, Council Tax, site visits), Development Management Records	DBC
Town Centres and Retail				

Policy	Indicator	Target	Source	Responsibility for Delivery
TC 1 Darlington Town Centre (Strategic Policy)	Net floorspace developed for town centre uses per annum, by: a. Town centre b. Edge of centre c. Out of centre location	Increase the vitality of the town centres and reduce vacant premises	Planning Policy Monitoring, Development Management Records	DBC
TC 2 Primary Shopping Area	Maintain the attractiveness of the primary shopping area	Number of vacant units within the town centre	Annual survey, Planning Policy Monitoring	DBC
TC 3 Additional Site for Town Centre Uses	Provision of additional retail floorspace within the town centre boundary	Amount of additional floorspace/number of additional units	Planning Policy Monitoring, Development Management Records	DBC
TC 4 District and Local Centres	Maintain the vitality and viability of district centres	Number of vacant units or changes of use from acceptable uses	Planning Policy Monitoring, Development Management Records	DBC
TC 5 Retail Impact Assessment Threshold (Strategic Policy)	Retail Impact Assessments submitted when required	Number of retail impact assessments received on developments between 500 sqm and 2,500 sqm	Planning Policy Monitoring, Development Management Records	DBC
TC 6 Darlington – Town Centre Fringe	(In the Local Plan, this policy didn't feature in previous monitoring framework table) Indicator required	Target required	Planning Policy Monitoring, Development Management Records	DBC
Environment				
ENV 1 Protecting, Enhancing and Promoting Darlington's Historic Environment (Strategic Policy)	1. Number of proposals granted permission contrary to Historic England advice on the grounds of impact on locally, regionally or nationally designated sites. 2. Reduction in the number of assets that are classified as heritage at risk. 3. Preparation of a local list. 4. Completion of conservation area action plans and management plans	No applications granted contrary to Historic England advice. Monitor Heritage at Risk Register. Track progress on local list preparation. Track progress on conservation area action plans and management plans.	Council's Conservation Officer, Development Management Records	DBC

	where one has not been produced and review others where necessary.			
Policy	**Indicator**	**Target**	**Source**	**Responsibility for Delivery**
ENV 2 Stockton and Darlington Railway (Strategic Policy)	Protect the integrity and associated assets of the S&DR railway	Number of applications determined which have an impact on the railway route asset	Development Management Records	DBC
ENV 3 Local Landscape Character (Strategic Policy)	Loss of important landscape areas	Target TBC	Development Management Records	DBC
ENV 4 Green and Blue Infrastructure (Strategic Policy)	Protection of green infrastructure assets	Target TBC	Development Management Records	DBC
Policy	**Indicator**	**Target**	**Source**	**Responsibility for Delivery**
ENV 5 Green Infrastructure Standards	Creation of new green infrastructure provided	Amount of new green infrastructure provided	Development Management Records	DBC
ENV 6 Local Green Spaces	Protection of designated local green spaces	Any net loss identified	Development Management Records	DBC
ENV 7 Biodiversity and Geodiversity and Development (Strategic Policy)	Protection of biodiversity and geodiversity	No net loss	Development Management Records including S106 agreements securing funds	DBC
ENV 8 Assessing a Development's Impact on Biodiversity (Strategic Policy)	Ensure measures are taken to protect important sites/species	Sites are protected or adequate mitigation is undertaken	Development Management Records	DBC
ENV 9 Outdoor Sports Facilities	Protecting and improvement of sports facilities	No net loss of sports facilities	Development Management Records	DBC
ENV 10 Trees and Hedgerows (Strategic Policy)	Indicator required	Target required	To be agreed	DBC
ENV 11 Water Quality (Nutrient Neutrality) (Strategic Policy)	Indicator required	Target required	To be agreed	

Policy	Indicator	Target	Source	Responsibility for Delivery
Transport and Infrastructure				
IN 1 Delivering a Sustainable Transport Network (Strategic Policy)	Number of travel plans submitted as part of decision making process	Monitor	Development Management Records, Sustainable Transport Records	DBC
IN 2 Improving access and accessibility (Strategic Policy)	All schemes to incorporate designs which allow alternatives to private motorised transport	Monitor	Development Management Records, Sustainable Transport Records	DBC
IN 3 Transport Assessment and Travel Plan (Strategic Policy)	Number of major developments that have submitted Travel Plans/Travel Assessments with their application	100% of applications have submitted a Travel Plan/Travel Assessment where required	Development Management Records, Sustainable Transport Records	DBC
IN 4 Parking Provision including Electric Vehicle Charging	Number of electric charging points permitted	Increased provision	Development Management Records	DBC
IN 5 Airport Safety (Strategic Policy)	Any developments within the defined safeguarding area around the airport	The airport operator are consulted on 100% of applications within the safeguarding area as defined on the Policies Map	Development Management Records	DBC
IN 6 Utilities Infrastructure (Strategic Policy)	Impact of development on utilities network	No net negative impact	Development Management Records	DBC
IN 7 Telecommunication Masts	Total of Telecommunications notifications received by a) new location; or b) on existing telecommunications locations	Monitor	Development Management Records	DBC
INV 8 Broadband Infrastructure (Strategic Policy)	Provision of broadband infrastructure within qualifying developments	All qualifying developments to provide broadband infrastructure	Development Management Records	DBC
IN 9 Renewable Energy Infrastructure (Strategic Policy)	Number of renewable energy schemes submitted	Number of schemes approved	Development Management Records	DBC
IN 10 Supporting the Delivery of Community and Social Infrastructure (Strategic Policy)	Contributions and community facilities provided	The amount of contributions secured for education and other community facilities	S106 records	DBC

12. GLOSSARY

Affordable Housing	Defined by the National Planning Policy Framework MHCLG, 2024.
Amenity	A broad concept that refers to the pleasant or satisfactory aspects of a place which add positively to its overall character and to the enjoyment of residents or visitors. For example, it encompasses human health, quality design, provision and protection of local services, local economy and the protection of the countryside, historic environment, environmental character and visual, air and noise quality. Amenity also encompasses leisure and sporting areas, such as playing fields and other open spaces used for sport.
Ancillary Uses	A subsidiary or secondary use or operation closely associated with the main use of a building or piece of land.
Ancient or Veteran Tree	A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.
Ancient Woodland	An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).
Biodiversity	Variety of life including different plants, animals and micro-organisms, and the ecosystems of which they are a part.
Biodiversity Net Gain (BNG)	An approach to planning and land management that leaves the natural environment in a better state than it was before and is defined as delivering more or better habitats for biodiversity. BNG is a mandatory requirement under the Environment Act 2021.
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.
Canopy Cover Assessment	An assessment of the area of ground directly covered by the leaves and branches of vegetation and is expressed as a percentage.
Climate Change Adaption	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate Change Mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Conservation Area	A designated area of special architectural and/or historical interest, the character or appearance of which it is desirable to preserve or enhance. It is a recognition of the value of a group of buildings and their surroundings and the need to protect not just individual buildings but the character of the area as a whole.
Developer Contributions	Section 106 contributions, planning obligations and /or Community Infrastructure Levy.
Embodied Carbon	The CO2 emissions associated with materials and construction processes throughout the whole lifecycle of a building or infrastructure. This is typically associated with any processes, materials or products used to construct, maintain, repair, refurbish and repurpose a building.
Flood Risk Assessment	Ensures that flood risk to a proposed development is considered, as well as the impact the development will have elsewhere on people and property. Its scope will reflect the scale, nature and location of the development.
Footloose Businesses	An industry that is not tied to any particular location and can relocate in response to changing economic conditions.
Green Corridor	Linear green feature connecting different greenspaces, can incorporate walking and cycling routes. Most are also wildlife corridors.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Includes locally important green spaces, green wedges, wildlife sites, allotments, urban fringe, trees, woodland, rights of way and countryside.
Geodiversity	The range of rocks, minerals, fossils, soils and landforms.
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Infill Development	The development of a small area of vacant land between existing buildings.
Local Green Space	A designation either in a local plan or neighbourhood development plan that provides special protection against development for green areas of particular importance to local communities.

Local Nature Recovery Strategy (LNRS)	A spatial strategy established by the Environment Act (2021) to reverse the decline of nature. The LNRS will map existing, valuable habitats and identify specific local priorities to create or improve them. Darlington will be covered by the Tees Valley LNRS produced by the Tees Valley Combined Authority.
Main Town Centre Uses	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Major Development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m^2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Material Consideration	A material consideration is a matter which the decision maker must take into account when assessing a planning application.
Market Signals	Local demand/pressures indicated by price signals or other indicators of market preference.
Maintenance Levy	Annual sum paid by the house owner or property owner to an independent body or management company to enable the long-term maintenance of green space or sustainable drainage
Masterplan	A type of planning brief outlining the preferred usage of land and the overall approach to the layout of a development. To provide detailed guidance for subsequent planning applications.
Neighbourhood Plan	A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.
Non-Designated Heritage Assets	Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by the Local Planning Authority as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.

Nutrient Neutrality (NN)	Nutrient Neutrality is a means of ensuring new development does not cause increased nutrient pollution to specific protected habitat sites. For proposals in Darlington Borough this is the Teesmouth and Cleveland Coast Special Protection Area.
Open Space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
PDL - Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for mineral extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built up areas such as residential gardens, parks, recreation grounds, and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Primary Agricultural Holding	An applicant's main holding registered as an agricultural holding used solely or mainly for the purposes of agriculture, horticulture.
Ramsar Site	Wetlands of international importance designated under the Convention on Wetlands especially as waterfowl habitat.
Rural Exception Sites	Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Setting of a Heritage Asset	The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
Significance (for heritage policy)	The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
Site of Special Scientific Interest	Sites designated by Natural England under the Wildlife and Countryside Act 1981.
Special Protection Area (SPA)	Areas designated to protect habitats for rare or migratory bird species, including their breeding, feeding and wintering grounds.
SPD - Supplementary Planning Document	Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Stepping Stones	Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.
Strategic Policies	Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.
Sustainable Drainage Systems	Reduces and slows the quantity and rate of surface water run- off from new development, dealing with it as close to the source as possible.
Sustainability Appraisal	An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Townscape	The general appearance of a built-up area, for example, a street, a town or a city.

Transport Assessment	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and measures that will be needed to deal with the anticipated transport impacts of the development.
Transport Statement	A simplified version of a transport assessment where it is agreed the transport issues arising out of development proposals are limited and a full transport assessment is not required.
Travel Plan	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.
Wildlife Corridor	Areas of habitat connecting wildlife populations.
Windfall Sites	Sites not specifically identified in the development plan.

Darlington Borough Council

Local Plan Review 2025-2042
Regulation 19
Draft Version

Appendices

Appendices

Appendix A	New Local Plan Housing Trajectory
Appendix B	Housing and Employment Allocation Statements
Appendix C	Darlington's Heritage Assets
Appendix D	Civil Aviation Authority Safeguarding
Appendix E	Affordable Housing Requirement
Appendix F	Nationally Described Space Standards

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Appendix A Housing Trajectory

Site ref number	Site Name	Planning Status	Site Location	Total Units	Size (ha)	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	Total within plan period
78	East of Middleton Road, Sadberge	Complete	Village	25	0.75	3																	3
424	182 Northgate	Complete	Urban	14	0.1	14																	14
426	Sherborne Close	Complete	Urban	14	0.6	14																	14
429	Eldon Street	Complete	Urban	12	0.13	12																	12
3	South of Burtree Lane	Commitment	Urban Extension	380	17.02			15	30	30	30	30	30	30	30	30	30	30	30	30	5		380
8	Berrymead Farm	Commitment	Urban Extension	348	21.24	107	32																139
41	South Coniscliffe Park	Commitment	Urban Extension	475	28.32	3	40	40	40	40	40	40	40	40	40	40	40	32					475
45	High Stell	Commitment	Village	198	8.49	13	20	20	20	20	20	7											120
68	West Park Garden Village	Commitment	Urban Extension	1200	79.32	98	130	30	30	30	30	30	30	30	30	30	30	10					538
89	Land west of Oak Tree, MSG	Commitment	Village	61	2.66		15	15	6														36
99	Maxgate Farm, MSG	Commitment	Village	260	13.71	47	50	30	30	30	30	30	13										260
146	Land South of Railway, MSG	Commitment	Village	326	14.8			30	60	60	60	60	56										326
249	Coniscliffe Park North	Commitment	Urban extension	985	50.08		30	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	930
390	West Park Garden Village North	Commitment	Urban extension	125	5.54									30	30	30	30	5					125
394	Lakeside, The Old Brickworks, Neasham Rd.	Commitment	Village	115	5.59	4	10	10	1														25
395	Dr Piper House, King Street.	Commitment	Urban	46	0.13		46																46
403	Blackwell Grange East	Commitment	Urban	44	5.26	15	12	12	5														44
410	Snipe Lane, Hurworth Moor	Commitment	Urban extension	449	23.64	131	60	60	8														259
412	12 - 18 Skinnergate	Commitment	Urban	16	0.22			16															16
422	Reservoir (Disused) Darlington Road, Sadberge	Commitment	Village	46	2.8			20	20	6													46
425	Former Rise Carr Club, Eldon Place	Commitment	Urban	18	0.05			18															18
11	Cattle Mart	Allocation	Urban	76	2.16				30	30	16												76
20	Great Burdon	Allocation	Urban Extension	1250	91.44						50	50	50	50	50	50	50	50	50	50	50	50	600
95	Beech Crescent East, Heighington	Allocation	Village	20	1.53							20											20
100	Hall Farm, Branksome	Allocation	Urban Extension	353	21.89				30	60	60	60	60	60	23								353
185	Burtree Garden Village	Allocation	Urban extension	2000	178.48			90	120	120	120	60	60	60	60	60	60	60	60	60	60	60	1110
251	Skerningham	Allocation	Urban extension	4500	492.19			20	70	90	120	150	150	150	150	150	150	150	150	150	150	150	1950
392	Elm Tree Farm	Allocation	Urban Extension	200	7.1			20	45	45	45	45											200
467	Tees Grange	Allocation	Urban	75	7.09			15	30	30													75
468	Kendrew Street Car Parks Regeneration Area	Allocation	Urban	125	1.34							30	30	30	30	5							125

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Site ref number	Site Name	Planning Status	Site Location	Total Units	Size (ha)	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	Total within plan period
471	Land east of Maidendale (former Ingenium Parc)	Allocation	Urban	720	42.5				30	30	30	30	30	30	30	30	30	30	30	30	30	30	420
504	Snipe Lane Hurworth Moor, Phase 2	Allocation	Urban	180	10.28							30	30	30	30	30	30						180
Small Sites (Less than 10 units)						25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	425
Total Gross Completions						**486**	**470**	**546**	**690**	**706**	**736**	**757**	**664**	**625**	**588**	**540**	**535**	**452**	**405**	**405**	**380**	**375**	**9360**
							2026/27 - 2030/31 Total				**3148**	**2031/32 - 2035/36 Total**				**3174**	**2036/37 - 2040/41 Total**				**2177**	**375**	
Total net completions						**460**													**Total dwellings 2026/27 - 2041/42**				**8874**

*Please note that the housing trajectory is not a track changed version.

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APPENDIX B HOUSING AND EMPLOYMENT ALLOCATION STATEMENTS

Housing Sites

Urban Extensions

Site 20 - Great Burdon

The site is an urban extension to the east of the main urban area. It is bounded by the A66 to the east, Darlington Road (A1150) to the north and Tornado Way (B6279) to the south. The site is greenfield land in agricultural use and is proposed for allocation for residential development with an indicative yield of 1250 dwellings; 600 of which are estimated to be delivered during the plan period.

Issues and requirements

a. Site vehicle access is to be taken from Darlington Road (A1150) and Tornado Way (B6279).
b. Site layout should make an allowance for a distributor road which will run north south across the site, linking Darlington Road (A1150) and Tornado Way (B6279).
c. Development should be concentrated on the southern part of the site to the south-east of Burdon Hill. Any development proposed to the north of Burdon Hill must converse those elements which contribute to the significance of listed buildings in Great Burdon, and the Haughton-le-Skerne Conservation Area. Avoid development on or immediately around Burdon Hill.
d. The western area of the site is within flood zones 2 and 3. This should be reflected in the site layout and development directed away from this area in line with the sequential approach. No development should be within FZ3b (with exception to essential infrastructure or water compatible development).
e. Parts of the site are susceptible to surface water flooding. ~~Development should be directed away from these areas in site layout.~~ This should be taken into account when devising the drainage strategy for the site.
f. The river corridor of the Skerne along the western boundary (existing green corridor) should be protected and enhanced including significant new green infrastructure provision. Robust links should be created to this area.
g. A proposed green corridor intersects the eastern part of the site, and another also follows the western boundary. These corridors should be enhanced as part of the development.
h. Local recreation and green infrastructure links surrounding Red Hall Local Wildlife Site could be strengthened.
i. There are opportunities to strengthen vegetation along existing road corridors in order to enhance green connectivity.
j. Historic field boundaries should, where possible, be maintained.
k. A gas pipeline, electricity pylons, water mains and sewers cross the site. Appropriate easements or diversions should be provided.
l. A scheduled monument (a World War II bombing decoy control shelter) is located to the north east of the site. Consideration of the Scheduled Monument must inform the site layout and design including a significant buffer to the monument. Improve interpretation and accessibility to this historic asset as part of the sites development whilst preserving its setting. An appropriate programme of archaeological evaluation and monitoring will need to be undertaken during groundworks to identify and record the location of decoy fires and safety enclosures related to the shelter.
m. The historic routes of the Stockton & Darlington Railway runs along the sites southern boundary and should be incorporated into the development with interpretation and access provided.
n. Development proposals need to consider an appropriate programme of targeted archaeological evaluation and mitigation of features identified during earlier geophysical survey and ensure they are suitably investigated and recorded prior to development.
o. A public right of way crosses the western part of the site, north to south, and should be considered in site layout.

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p. There is the potential of great crested newts on the site. ~~An ecological survey~~ Ecological assessment in line with Policy ENV8 would be required to support a planning application.
q. A robust and appropriately landscaped boundary would be required along the north western edge of the site to maintain the openness and green infrastructure function of the adjoining Great Burdon Rural Gap (see policy ENV3).
r. The openness and green infrastructure functions of the Haughton/Red Hall green wedge on the western part of the site should be retained and enhanced (see Policy ENV3).

Site 100 - Hall Farm, Branksome

The site is an urban extension to the west of the main urban area. It is bound by the A1(M) to the west and Malvern Crescent to the east. The site is greenfield land in agricultural use and is proposed for allocation for residential development with an indicative yield of ~~400~~353 dwellings.

Issues and requirements

a. Allowance should be made in the site layout for an outer distributer road, running north south across the site.
b. A proportion of the site along the southern boundary is within flood zone 2 and 3. This should be reflected in the site layout and development directed away from this area in line with the sequential approach. No development should be within FZ3b (with exception to essential infrastructure or water compatible development).
c. There is also a watercourse along the eastern boundary of the site and no floodrisk data is available for this area. As a minimum there should be ground level surveys undertaken to determine risk from the river and hydraulic modelling may be required.
d. Parts of the site are susceptible to surface water flooding. ~~Development should be directed away from these areas in site layout.~~ This should be taken into account when devising the drainage strategy for the site.
e. Beck valleys (Baydale and Cocker Beck) within and adjacent to the site should be protected and opportunities taken to extend and enhance green corridors / green infrastructure. They are identified as existing and proposed green corridors. Significant green infrastructure should be provided along the southern boundary to mitigate potential flooding.
f. A significant landscape buffer should be provided along the A1(M).
g. A public right of way extends along the sites western boundary. This should be considered in site layout and opportunities for enhancement.

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Site 392 - Elm Tree Farm

The site is an urban extension to the north east of the main urban area. The site is to the north of Sparrow Hall Drive. It is a greenfield site which is largely in agricultural use and is proposed for allocation for residential development with an indicative yield of 200 dwellings.

Issues and requirements

a. Vehicular access is to be taken from Sparrow Hall Drive.
b. The Green Lane historic track runs adjacent to the site and should be protected.
c. Old farm buildings on site could contain biodiversity interest. ~~An ecological survey~~ Ecological Assessment in line with Policy ENV8 may be required to support a planning application.
d. There is opportunity for reinforcement of local recreational and green infrastructure links particularly west towards Springfield Park and north towards the River Skerne.
e. Parts of the site are susceptible to surface water flooding. ~~Development should be directed away from these areas in site layout.~~ This should be taken into account when devising the drainage strategy for the site.
f. A public footpath crosses the southeastern part of the site and should be considered in layout.

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Site 504 - Snipe Lane, Hurworth Moor, Phase 2

The site is an urban extension to the south of the main urban area and is adjacent to an existing housing commitment. It is bound by the housing development under construction to the east, the A66 to the south and railway lines and Geneva Woods to the west and north. The site is greenfield land in agricultural use and is proposed for allocation for residential development with an indicative yield of ~~145~~180 dwellings.

Issues and requirements

a. Vehicular access to the site should be taken from the adjacent development site to the west and Neasham Road.

b. There is a small area of landfill on the site and areas of gypsum which should be considered in any development proposal.

c. Site is adjacent to the A66 to the south and railway lines to the west and north. Site layout should mitigate any potential impacts.

d. The site is located adjacent to the Geneva Wood Local Nature Reserve and a proposed green corridor crosses the western part of the site. There is also a small area of priority habitat (deciduous woodland) in the south-western corner of the site (see policy ENV10). A scheme should include provision of appropriate landscaping and other mitigation, including landscape buffer, to reduce impact on the LNR. The opportunity could also be taken to create new green links to this area.

e. There is the opportunity to strengthen boundaries along the A66 with planting to create green corridors.

f. There is the potential for Great Crested Newts on the site. ~~An ecological survey~~ Ecological assessment in line with Policy ENV8 will be required to support a planning application.

g. A number of public rights of way cross the site which should be considered in the site layout.

h. There are a number of railway cottages on the site which should be integrated into the scheme.

i. Parts of the site are susceptible to surface water flooding. Development should be directed away from these areas in site layout.

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Urban Area

Site 11 - Cattle Mart

This brownfield site was previously a cattle and auction mart but has been cleared and currently in use as a surface car park. It is located to the south west of the town centre. Although not currently available work is underway to develop a new multi story car park for Bank Top train station and once complete this site will no longer be required. The site is proposed for allocation for residential development with an indicative yield of 76 dwellings.

Issues and requirements

a) The East Coast mainline and Bank Top Station lie to the east of the site; appropriate mitigation should be provided.
b) The site will likely have some contamination that should be remediated as part of a development scheme.
c) Numerous TPO trees are present along the sites northern boundary. Development need not impact on the trees and could result in new planting (see policy ENV10).
d) The Grade II* listed Bank Top Station is located adjacent to the site. Development of the site will need to enhance the setting of the listed building and also reflect railway terraced development which is prevalent in the area.
e) Development should be concentrated on the western half of the site set back from Park Lane maintaining open views of heritage assets.
f) Development should respect the historic grain of development, use sympathetic materials, and be of an appropriate scale and design so as not to compete with the more prominent buildings in the area, particularly Bank Top Station.
g) Wherever possible, non-designated heritage assets (identified by the Heritage Impact Assessment) on the site should be retained and re-used as part of the sites redevelopment. Development proposals will need to consider an appropriate programme of targeted archaeological evaluation and mitigation during groundworks, in particular in the area of the previous car park.
h) Parts of the site are susceptible to surface water flooding. Development should be directed away from these areas in site layout.

Site 467 – Tees Grange

The site is located within the south western part of the main urban area. It is greenfield land used for grazing with woodland along the eastern and western boundaries. Hummersknott Academy is located to the east, Broken Scar Water Treatment works to the west and residential uses to the north and south. Coniscliffe Road (A67) is also located to the south which is a main route into Darlington town centre. The site is proposed for residential development with an indicative yield of ~~89~~75 dwellings.

Issues and requirements

a. Vehicular access to the site should be taken from Coniscliffe Road and will involve the demolition of 506 Coniscliffe Road.
b. The site has existing biodiversity value and wildlife habitats and features which should be protected and enhanced.
c. There is priority habitat deciduous woodland along the eastern boundary of the site. There are also a number of TPOs on the site (see policy ENV10) and it is in close proximity to ponds with great crested newts. ~~An ecological survey~~ Ecological assessment in line with Policy ENV8 will be required to support a planning application.
d. Broken Scar Local Wildlife Site is located to the north-west. An appropriate buffer should be provided in this area and there are opportunities to enhance the surrounding green infrastructure network.
e. The site is within an area of ~~special~~ high archaeological potential ~~interest~~. A planning application must be accompanied by an archaeological evaluation report.
f. Pockets of the site are susceptible to surface water flooding. Development should be directed away from these areas in site layout.

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Site 468 – Kendrew Street Car Park Regeneration Area

The site is brownfield land to the north of Darlington town centre. It consists of a surface car park and a mix of commercial units and office use. St Augustine's Way (town centre ring road) is located to the south with car parking and the town centre beyond. To the north is North Lodge Park and Council offices at Central House. To the west is largely residential and to the east a mix of commercial uses. The site is ~~allocated for housing, with a yield of approximately 125 dwellings~~ proposed for allocation for mixed use development with an indicative yield of 125 dwellings, including compatible commercial development and potential for specialist housing.

a. Vehicular access to be taken from Gladstone Street.
b. The site is partly within Northgate Conservation Area and adjacent to a number of listed buildings and structures including Central School, Central School Annexe, North Lodge, 138 – 148 Northgate and the Band Stand at North Lodge Park. The impact on these heritage assets should be carefully considered in the development of the site. Any scheme would require appropriate design and layout to mitigate any harm.
c. The site is within an area of special archaeological interest. A planning application must be accompanied by an archaeological evaluation report.
d. Pockets of the site are susceptible to surface water flooding. Development should be directed away from these areas in site layout.
e. Consider amenity impacts from the ring road and include appropriate mitigation.

Site 471 – Land east of Maidendale (former Ingenium Parc)

The site is located to the south east of main urban area and is largely agricultural land with some associated buildings and a car park linked to the adjacent employment area. The site is bound by the railway line to the south and A66 to the east. There is green space and employment uses to the north, with Maidendale Nature Reserve to the west. The site is to be allocated for approximately 720 dwellings.

Issues and requirements

a. Vehicular access to be taken from Salters Lane and/or Alderman Best Way.
b. Development should provide new road infrastructure connecting the site to Morton Palms Business Park.
c. The site has existing biodiversity value and wildlife habitats and features which should be protected and enhanced. This is particularly the case in the southern area of the site adjacent to the railway. There is the potential for great crested newts on the site. ~~An ecological survey~~ Ecological assessment in line with Policy ENV8 would be required to support a planning application.
d. Existing and proposed green corridors bound the site along the southern and western boundaries. This provides opportunities to strengthen vegetation along these corridors and create new linkages to them in order to enhance the green infrastructure network.
e. The site is adjacent to Maidendale Nature Reserve and Local Wildlife Site. Suitable buffering should be provided and there is the opportunity to create enhanced habitat links to the area.
f. Site design should give consideration to the listed buildings at the Cummins site to the north and the associated landscaping which is a registered park and garden.
g. Salters Lane historic route runs along the western boundary of the site and should be protected and where possible enhanced.
h. Development proposals will need to consider an appropriate programme of targeted archaeological evaluation and mitigation, particularly in the southern part of the site.
i. Historic field boundaries should, where possible, be maintained.

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j.	A public footpath follows the south-western boundary of the site. This should be considered in site layout.
k.	Consider amenity impacts from surrounding employment uses and railway line. Suitable mitigation should be provided.
l.	Pockets of the site are susceptible to surface water flooding. Development should be directed away from these areas in site layout.

Villages

Site 95 - Beech Crescent East, Heighington

The site is located to the north of east of Heighington village and is bound by the A6072 to the east. It is greenfield land currently in agricultural use. The site is proposed for allocation for residential development with an indicative yield of 20 dwellings.

Issues and requirements:

a. Vehicular access to be taken from the adjoining housing development to the west.
b. The impact on the Heighington conservation area and the grade II listed buildings to the south should be carefully considered in the development of this site. Any scheme would require appropriate design and layout to mitigate any harm to these heritage assets and should be undertaken in accordance with the recommendations of the Heritage Impact Assessment.
c. The site is within an area of ~~special archaeological interest~~ high archaeological potential.
d. Areas along the site boundaries are susceptible to surface water flooding. Development should be directed away from these areas in site layout.

Employment

Site 360 - Heighington North

The 5.7 hectare Heighington North site is part of the cross-boundary Merchant Park development with County Durham in which the Hitachi factory in Newton Aycliffe is located. The sites East and South boundaries are with the remainder of the Merchant Park site. The sites Northern boundary is with Heighington Lane.

Issues and requirements

a. Vehicular access is to be taken from Heighington Lane.
b. Development proposals should be in line with the Merchant Park Masterplan.
c. Retain and enhance the wooded areas along the sites North and West boundaries.
d. A small part of the site is within flood zone 2 and 3 as Demon's Beck runs through the site. In the future, climate change is expected to increase the area at risk of flooding. Any alterations to flow path, ground levels or other blockages within existing and future flood zone 3 areas will require hydraulic modelling of the Heighington Industrial Estate to determine the impacts. The site is also at risk from surface water flooding along the beck corridor. ~~Development should be directed away from this area in line with the sequential approach and appropriate mitigation provided.~~ This should be taken into account when devising the drainage strategy for the site. No development should be within FZ3b (with exception to essential infrastructure or water compatible development).

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Site 362 - Teesside International Airport South
The 39.30 hectare Teesside International Airport South site lies to the south of the operational airport and its eastern boundary is defined by the borough boundary with Stockton-on-Tees. The southern and western boundaries of the site are with agricultural land running towards the river Tees.

Issues and requirements

a. Vehicular access should be provided across the site's boundary with Stockton-on-Tees Borough via the adjoining allocation site in Stockton-on-Tees Local Plan
b. Development must not interfere with the operation of the airport.
c. A joint design approach with the neighbouring allocation site in Stockton-on-Tees is required.
d. A detailed masterplan for the site that describes the significance of heritage assets on the site and seeks to conserve and enhance them must be submitted in support of any planning application.
e. The scale, layout and design of development should respond sympathetically to the historical significance of the site, preserving the overall layout of the Second World War and Cold War airfield, and securing the future of the remaining heritage assets on the site as identified in the Heritage Impact Assessment.
f. Development should look to retain the form and layout of the former military airfield by locating buildings of an appropriate scale and design over the dispersal areas and former administrative building footings, interspersed by grassland areas, and by maintaining the existing access plan. Development proposals should include signage and information that helps to interpret the history of the site.
g. Development proposals should acknowledge the historical association between the former military airfield and the adjacent Grade II Church of St George, protecting the setting of the building.
h. Targeted archaeological evaluation will be required prior to development and any resulting mitigation secured in line with Policy ENV 1.
i. Careful ecological assessment, in line with Policy ENV8, and planning is required, taking into account existing landscape features.

Site ~~471~~ 433 – Burtree Lane Employment Park

The 37.57 hectare Burtree lane Employment Site is a strategic employment site close to Darlington's Junction 68 on the A1(M) and the A68. The site is located north of the A1(M) and east of the A68. The western end of Burtree Lane runs through the allocation site. Burtree Garden Village south of the A1(M) is adjoining and the Darlington Farmers Auction Mart Site with Burtree Caravan Centre and the Burtree Inn public house are to the North and west of the site. ~~Minimal topography change on the site makes the site suitable for industrial and logistic development.~~

Issues and requirements

a. Providing suitable plots for of mixture of mid-sized and large-sized B2 and B(8) land use plots.
b. A masterplan for the site should be developed to ensure that a cohesive and high quality ~~of design is delivered that meets the aspirations of Burtree Lane~~ designed Employment Park is delivered which protects the qualities and key sensitivities of the landscape.
c. Burtree Gate Marsh Local Wildlife Site is located to the north-east. ~~An appropriate~~ Suitable buffering should be provided ~~in this area~~ and there are opportunities to create enhanced habitat links to the area and enhance the surrounding green infrastructure network.
d. Provide a suitable landscape buffer to A1(M), Burtree Lane and adjoining sites.
e. Enhance connectivity and mitigate any significant adverse impact to the A1M and the A68, as well as providing connectivity to Burtree Lane.
f. Provide suitable connectivity with sustainable transport networks. This should include footway, cycleway and public transport connections (including enabling connectivity to Site 393- Darlington Farmers Auction Mart).
g. An appropriate buffer should be provided around the ordinary watercourse in the northern section of the site. There is no flood risk data available for this watercourse which is culverted immediately downstream and may cause flooding issues on site. As a minimum, ground level surveys should be undertaken to determine risk of flooding from the watercourse and hydraulic modelling may be required. The capacity of the culvert should

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Site 474 – East Street

East Street is a 1.25 hectare strategic Town Centre employment site adjoining ~~Crown Street~~ Darlington Library, the River Skerne, St Cuthberts Way and Priestgate. It is a key regeneration area in Darlington with high potential for ~~Office development~~ office led, mixed use development , including commercial and other town centre uses reflecting its sustainable location and regeneration role opposite the Darlington Economic Campus at Brunswick Street which is currently under construction

Issues and requirements

a) Providing suitable plots for Office development E (g) on high specification of Grade A and above and other appropriate E - and Town Centre uses.
b) Ensure that a high quality of design is delivered in line with DC1 that meets the aspirations of Darlington Town Centre
c) The site is adjacent to the Town Centre Conservation Area and the Grade II listed buildings to the east, including the library building. The impact on these heritage assets should be carefully considered in the development of this site. Any scheme will require appropriate design and layout to mitigate any harm to these heritage assets
d) Provide a suitable landscape buffer to the River Skerne Proposed Green Corridor and St Cuthberts Way and support the achievement of the actions set out in Part Bi-vii of Policy ENV7 where relevant.
e) ~~Ensure that Flood risk from the River Skerne is mitigated efficiently.~~ The site is in flood zone 2 and 3. This should be reflected in the site layout and development directed away from this area in line with the sequential approach. No development should be within FZ3b (with exception to essential infrastructure or water compatible development).
f) Enhance connectivity to Crown Street and St Cuthberts Way in Darlington Town Centre.

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APPENDIX C DARLINGTON'S HERITAGE ASSETS

Summary of Designated Heritage Assets

Listed Buildings (541)

All Listed Buildings in Darlington Borough can be found on the National Heritage List for England (NHLE) at https://historicengland.org.uk/listing/the-list/. It is advisable to use the map-search function. If you do word-search, please keep in mind that the official name of your listed building may differ from the current property name.

More information on Listed Buildings can be found on our website: https://www.darlington.gov.uk/planning-and-building-regs/planning/conservation-historical-environment/listed-buildings/

Scheduled Monuments (19)

All Scheduled Monuments in Darlington Borough can also be found on the National Heritage List for England (NHLE) at https://historicengland.org.uk/listing/the-list/. Again, it is advisable to use the map-search function.

- Archdeacon Newton: medieval site
- Bishopton: Castle Hill earthworks
- Brafferton: Ketton Bridge
- Coatham Mundeville: medieval village
- Darlington: Coniscliffe Road waterworks
- Great Burdon: World War II bombing decoy control shelter
- Heighington: camp on Shackleton Hill
- High Coniscliffe: Smotherlaw round barrow
- High Coniscliffe: Ulnaby deserted medieval village
- Low Dinsdale: earthworks of manor hours
- Low Dinsdale: Angle-saxon cross
- Middleton St. George: deserted village of West Hartburn
- Middleton St George: Tower Hill Motte
- Piercebridge: Roman station
- Piercebridge: Piercebridge Bridge
- Sadberge: shrunken medieval village
- Sockburn: All Saints Church
- Summerhouse: Summerhouse earthworks
- Walworth: deserted village

More information on Scheduled Monuments can be found at: https://www.darlington.gov.uk/planning-and-building-regs/planning/conservation-historical-environment/scheduled-monuments/

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Conservation Areas (18)

All Conservation Areas in Darlington Borough as well as more information on them can be found on our website: https://www.darlington.gov.uk/planning-and-building-regs/planning/conservation-historical-environment/conservation-areas/

- Bishopton
- Coatham Mundeville
- Cockerton Green
- Denton
- Haughton-le-Skerne
- Heighington
- High Coniscliffe
- Hurworth
- Middleton One Row
- Parkgate
- Piercebridge
- S & DR: Middleton St George (Fighting Cocks)
- S & DR: Northgate
- Sadberge
- Summerhouse
- Town Centre
- Victoria Embankment
- West End

Registered Parks and Gardens (3)

All Registered Parks and Gardens in Darlington Borough can be found on the National Heritage List for England (NHLE) (https://historicengland.org.uk/listing/the-list/). It is advisable to use the map-search function.

- South Park
- West Cemetery
- Landscape at Cummins Engine Factory

Significance of Heritage Assets in Darlington

In determining planning applications that may affect a heritage asset – i.e. a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions – the Council requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. This should be done as part of a Heritage Statement or Design and Access Statement. 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. As a minimum the relevant Historic Environment Record (HER) (held with Durham County Council) should be consulted and the heritage assets assessed using appropriate expertise where necessary.

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

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The significance of a heritage asset is the sum of its heritage values (interests). Annex 2: Glossary of the NPPF (2024) defines significance (for heritage policy) as "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical prescence, but also from its setting". The most communly used heritage values are set out in ~~English Heritage's~~ Historic England's Conservation Principles, Policy and Guidance (2008) ~~for the Sustainable Management of the Historic Environment~~ available here:

https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/

Evidential value: the physical remains of past human activity.

Evidential value comprises the surviving original/old fabric (materials), features and/or layout of heritage assets above and below ground, including any historical 'wear and tear' and alterations. It is the primary source of evidence and can often tell us about the former use (i.e. historical value) of certain heritage asset types (e.g. the original floor plan of a building which shows the division between main and service areas). Evidential value is therefore of high importance. Any damage to or loss of it tends to be non-reversible and diminishes our ability to understand and interpret the heritage asset.

Historical Value (associative and illustrative) - the ways in which past people, events and aspects of life can be connected to a heritage asset; this tends to be illustrative or associative.

Sources of information include designation records, entries on the HER, historical records and various publications (e.g. The Victoria History of the Counties of England. A History of the County of Durham, Volume IV: Darlington and books/articles by George Flynn or Chris Lloyd).

Typical examples of historical value in Darlington Borough are:

- Heritage assets which have associations with important people such as the Quakers (e.g. Barclay's Bank, Darlington Library)
- Heritage assets which have associations with important events such as the opening of the Stockton & Darlington Railway (e.g. Skerne Bridge)
- Heritage assets which have associations with other former industry, such as leather/tanning, textile and steel (e.g. Skinnergate)
- Heritage assets which have associations with other aspects of Darlington's historical development (e.g. former burgage plots, yards and wynds, the Iron Age hill fort at Shackleton Beacon)

Aesthetic Value (designed and fortuitous) - the sensory and intellectual stimulation people draw from a heritage asset; it can be the result of its design or its development over time.

Typical examples of aesthetic value in Darlington Borough are:

- Landmark structures (e.g. the Clock Tower)
- Heritage assets of high-quality or, sometimes, unusual design, also in terms how they harmonise with their setting and other surrounding assets (e.g. Church of St Cuthbert within the churchyard)
- Heritage assets which have high-quality detailing (e.g. the former Technical College)
- Groups of heritage assets which are aesthetically pleasing or characterful, often not the result of an overall design but organic development over time (e.g. Piercebridge village)

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Communal Value - the meanings of a heritage asset for the people who relate to it (e.g. residents and other stakeholders)

Typical examples of communal value in Darlington Borough are:

- Heritage assets which are the focus of a community or interest group (e.g. pubs, religious buildings)
- Heritage assets with links to collective identity or memory (e.g. the Clock Tower, war memorials)
- Heritage assets which people have personal memories of (e.g. from their childhood)

Non-designated Heritage Assets

National planning practice guidance refers to non-designated heritage assets as buildings, monuments, sites, places, areas or landscapes identified by the Council as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.

A criteria-based approach for identifying them, which has been taken by a number of Local Authorities, has been shown to be robust at both application and appeal stage.

Once identified these non-designated heritage assets will be recorded on the Council's in-house UNIform system and be added to the Historic Environment Record (HER).

Darlington's locally significant buildings, monuments, sites, places, areas or landscapes will be identified using the following criteria either through the development management process (including pre-applications), through plan making (including neighbourhood plans), the production of Conservation Area Appraisals and Management Plans, and other Council activities.

Table C.1 Criteria for assessing non-designated heritage assets

Criteria	Description
Age	This may be an important criterion. The age range can take into account distinctive local characteristics or building traditions.
Rarity	Judged against local characteristics.
Architectural or artistic interest	The intrinsic design and aesthetic value relating to local or national styles, materials, construction and craft techniques, or other distinctive characteristics.
Group Value	Groupings of heritage assets with a clear visual design or historic relationship.
Archaeological Interest[1]	Physical evidence about past human activity in the locality, which may be in the form of buried remains, but may also be revealed in the structure of buildings or in a designed

[1] Non-designated Heritage Assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments, should be considered subject to the policies for designated heritage assets, as stated in Footnote 75 of the NPPF (December 2024).

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	landscape, for instance.
Historic Interest	A significant historical association of local or national note, including links to important local figures. Blue Plaque and similar schemes may be relevant. Social and communal interests have special value, relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence, and contributing to the 'collective memory' of a place.
Landmark Status	A heritage asset with strong communal or historical associations, or because it has especially striking aesthetic value within the local scene.

If the potential asset meets two or more of the criteria set out in the table above, then it should be considered a Non-Designated Heritage Asset.

Areas of High Archaeological Potential

Durham County Council's Archaeological Service maintain the Historic Environment Record (HER) on behalf of Darlington Borough Council. The HER is the principal source of information about the historic environment of County Durham and Darlington.

Using the information contained in the HER, the County Council has assisted the Borough Council in producing a map of areas that include, or have the potential to include, heritage assets with archaeological interest. The identification of these 'Areas of High Archaeological Potential' is part of the Borough Council's positive approach to the historic environment as required by national policy[2].

In mapping Areas of High Archaeological Potential the following have been included, where present in the Borough:

- Scheduled Monuments and a 50 meter buffer zone around them. The reason for the buffer zone is that many scheduling's were done decades ago with only the core element protected. Also, in some cases, subsequent research and discoveries have shown sites are often more extensive than previously appreciated;
- Conservation areas along with the 'historic cores' of settlements (as defined by the County Durham and Darlington Historic Landscape Characterisation Project) which may not be a Conservation Area or extend beyond the Conservation Area boundary;
- Registered Historic Parks and Gardens;
- Non-designated deserted or shrunken medieval
- villages; Mining and industrial sites/complexes;
- Archaeological sites and their environs;
- Cluster analysis involving entries that are within 100 metres of another record. The basis for this is that clusters of discoveries in close proximity may well indicate the existence of hitherto unknown sites. However, certain types of site do not usefully reflect this, and were filtered out of the cluster analysis – these included:
    - Records which fell into the areas already added to the trigger map by the above processes.
    - Records likely to reflect buildings rather than archaeology (e.g. Broad Type of

100 [2] Paragraph 203 of the NPPF (December 2024).

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- Historic Building; or Monument Types such as Barn, Bastle, Cart Shed, Dovecotes; Farmhouse, House, icehouse, Public House, School, Sheep Fold etc.).
- Records which were thought to represent single features (e.g. Boundary Stones, Milestones, Chest Tombs, War Memorials, Commemorative Monuments, Crosses, Effigies, Gate Piers, Grave Slabs).
- Monuments types which often represent storage locations of items rather than find locations (e.g. Altars, Sculpture, Hog backs – all of which are often depicted at the Church they are stored at rather than from where they were recovered).
- Non-archaeological records (e.g. Broad Types of Historic Overviews, Maritime or Aircraft Crash Sites, or Monument Types of Local History or relating to any of these broad types e.g. Wreck, Ship etc.).

In some cases – for example Piercebridge – research both here and at other Roman forts shows that the complex of archaeological phenomena outside the defended area is far more extensive than once appreciated (including civil settlement, cemeteries, religious sites, etc.) so the area of archaeological interest extends beyond the formally designated area.

The areas of high archaeological potential are illustrated in Figure C.1 below. It should be noted that these are not static and need to be updated periodically as new or updated data is added to the Historic Environment Record. So, the interactive policies map should be consulted for the latest information

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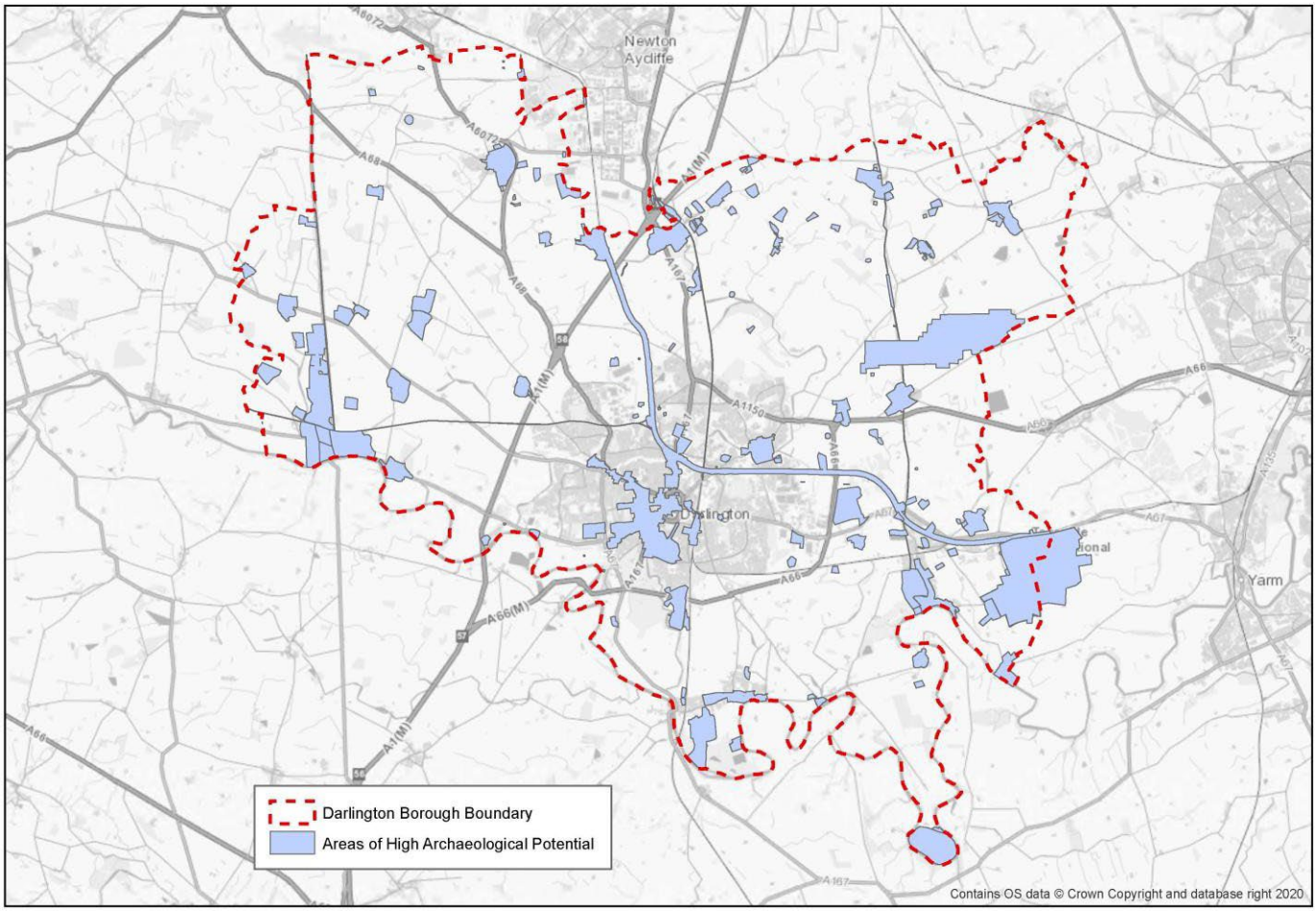
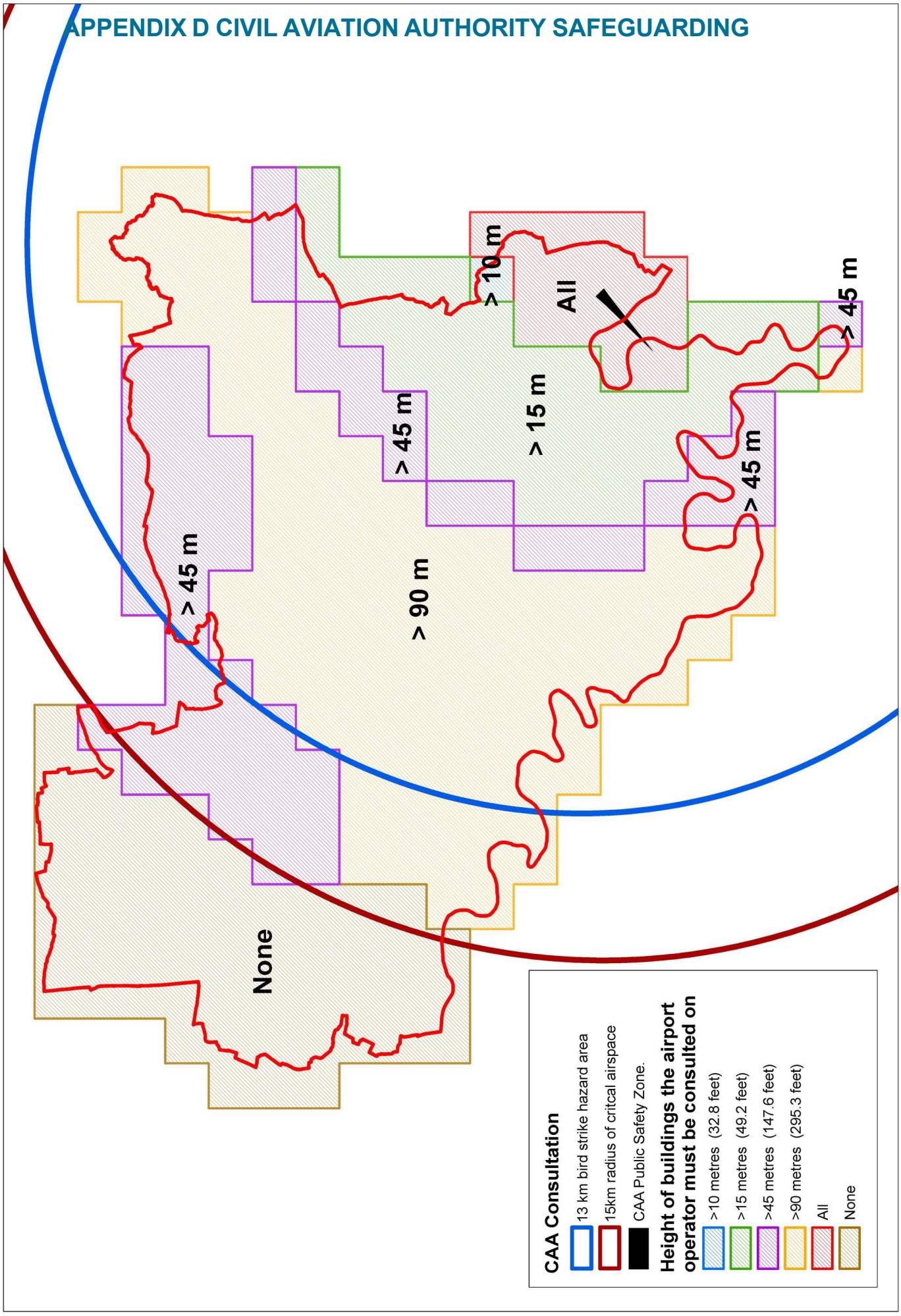
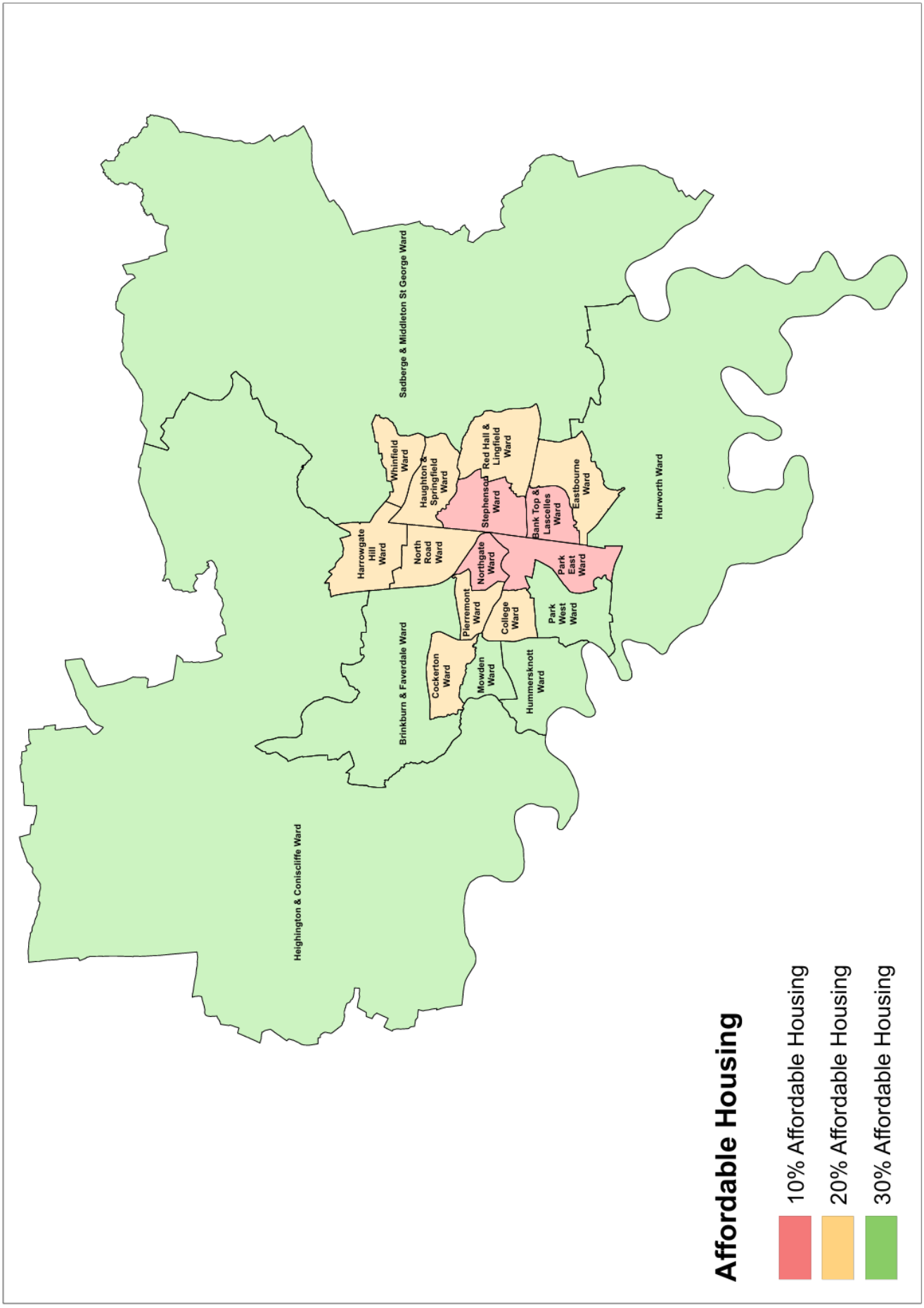
Figure C.1 Areas of High Archaeological Potential



APPENDIX D CIVIL AVIATION AUTHORITY SAFEGUARDING



APPENDIX E - AFFORDABLE HOUSING REQUIREMENT



APPENDIX F: Nationally Described Space Standards

The standard requires that:

a) the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
b) a dwelling with two or more bedspaces has at least one double (or twin) bedroom
c) in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m^2 and is at least 2.15m wide
d) in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m^2
e) one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
f) any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m^2 within the Gross Internal Area)
g) any other area that is used solely for storage and has a headroom of 900- 1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
h) a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m^2 in a double bedroom and 0.36m^2 in a single bedroom counts towards the built-in storage requirement
i) the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

Table 1 - Minimum gross internal floor areas and storage (m^2)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

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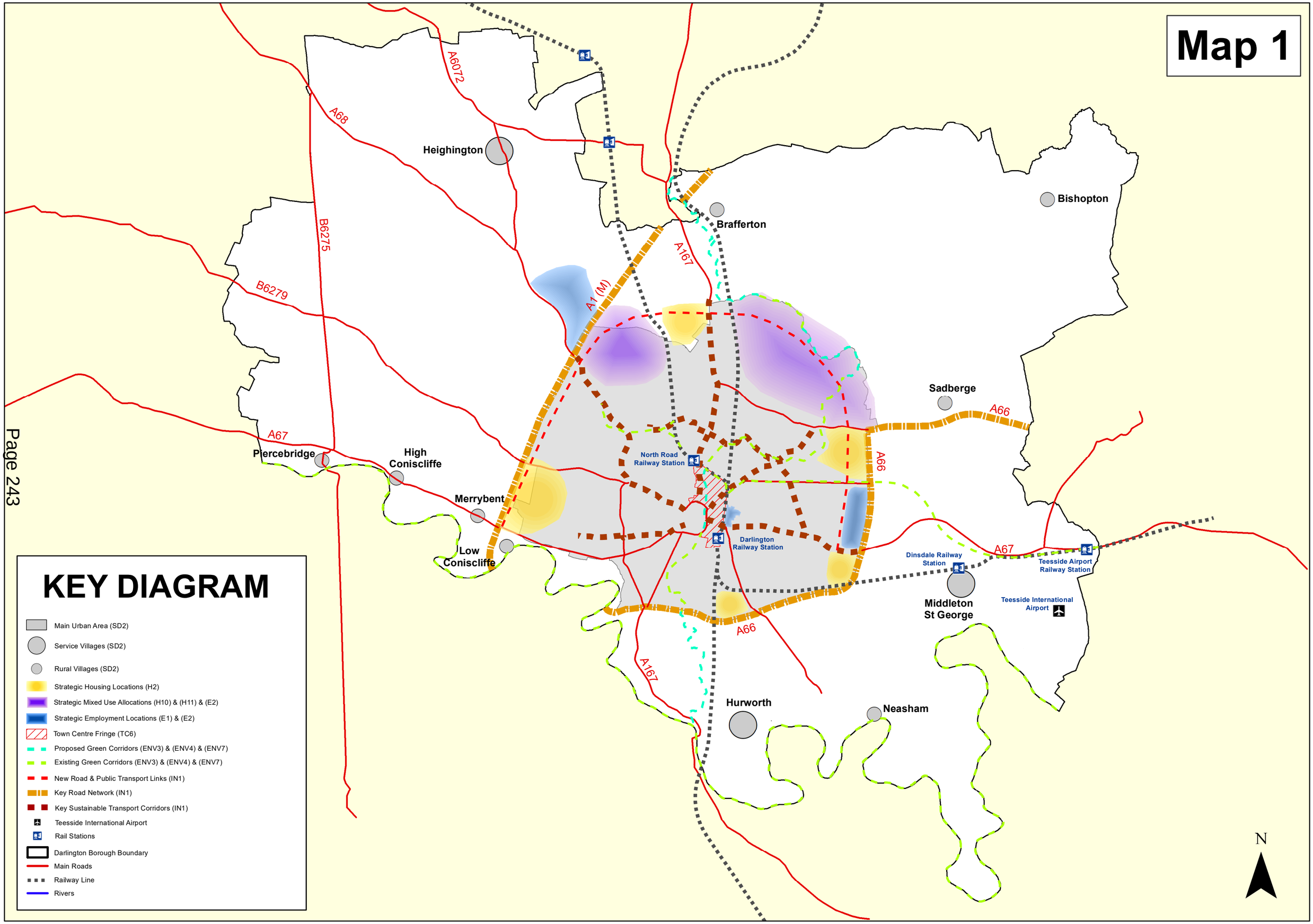
Map 1



KEY DIAGRAM

- Main Urban Area (SD2)
- Service Villages (SD2)
- Rural Villages (SD2)
- Strategic Housing Locations (H2)
- Strategic Mixed Use Allocations (H10) & (H11) & (E2)
- Strategic Employment Locations (E1) & (E2)
- Town Centre Fringe (TC6)
- Proposed Green Corridors (ENV3) & (ENV4) & (ENV7)
- Existing Green Corridors (ENV3) & (ENV4) & (ENV7)
- New Road & Public Transport Links (IN1)
- Key Road Network (IN1)
- Key Sustainable Transport Corridors (IN1)
- Teesside International Airport
- Rail Stations
- Darlington Borough Boundary
- Main Roads
- Railway Line
- Rivers

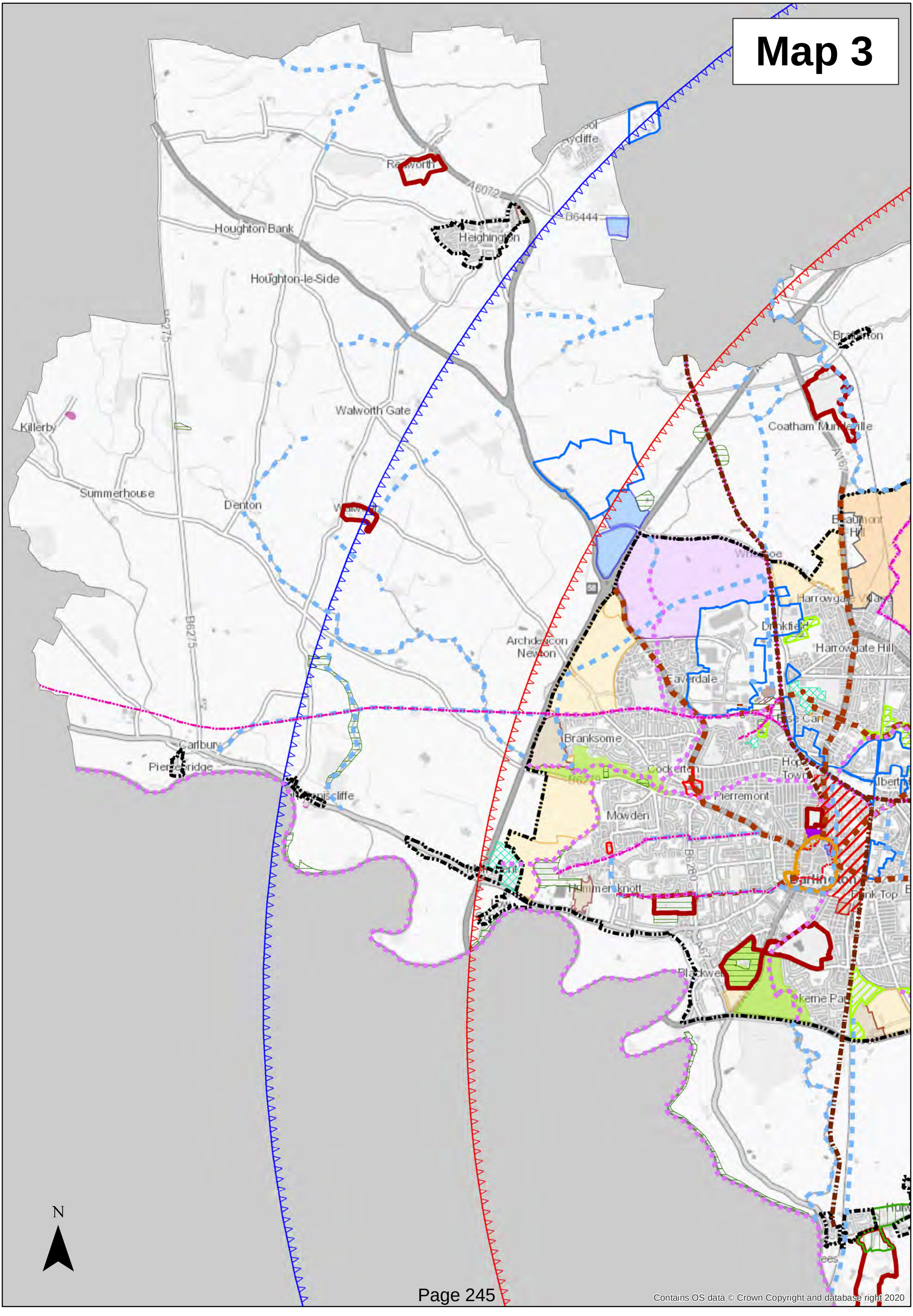
Map 2

Map 3

Map 4

N

Map 3



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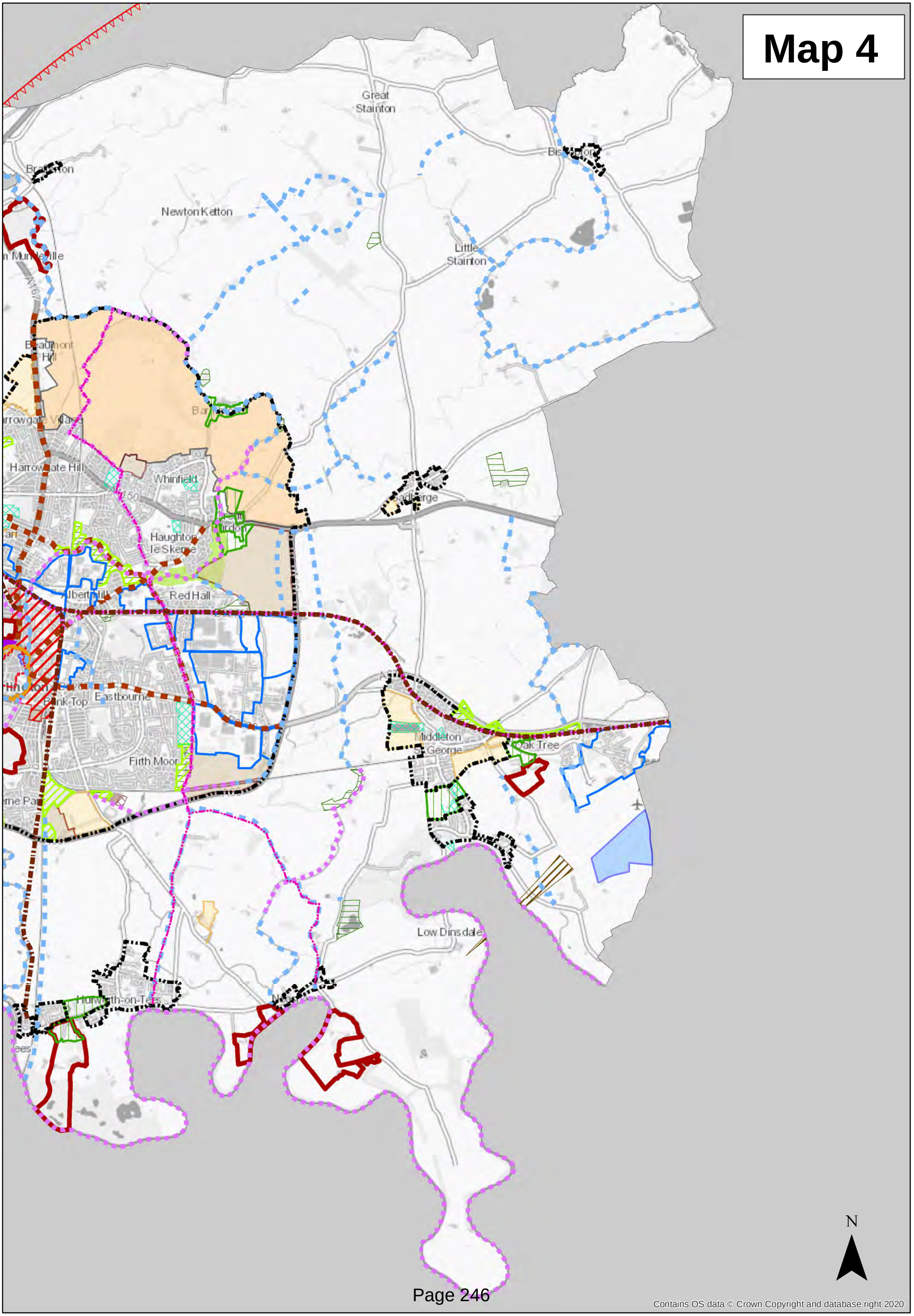
Map 4



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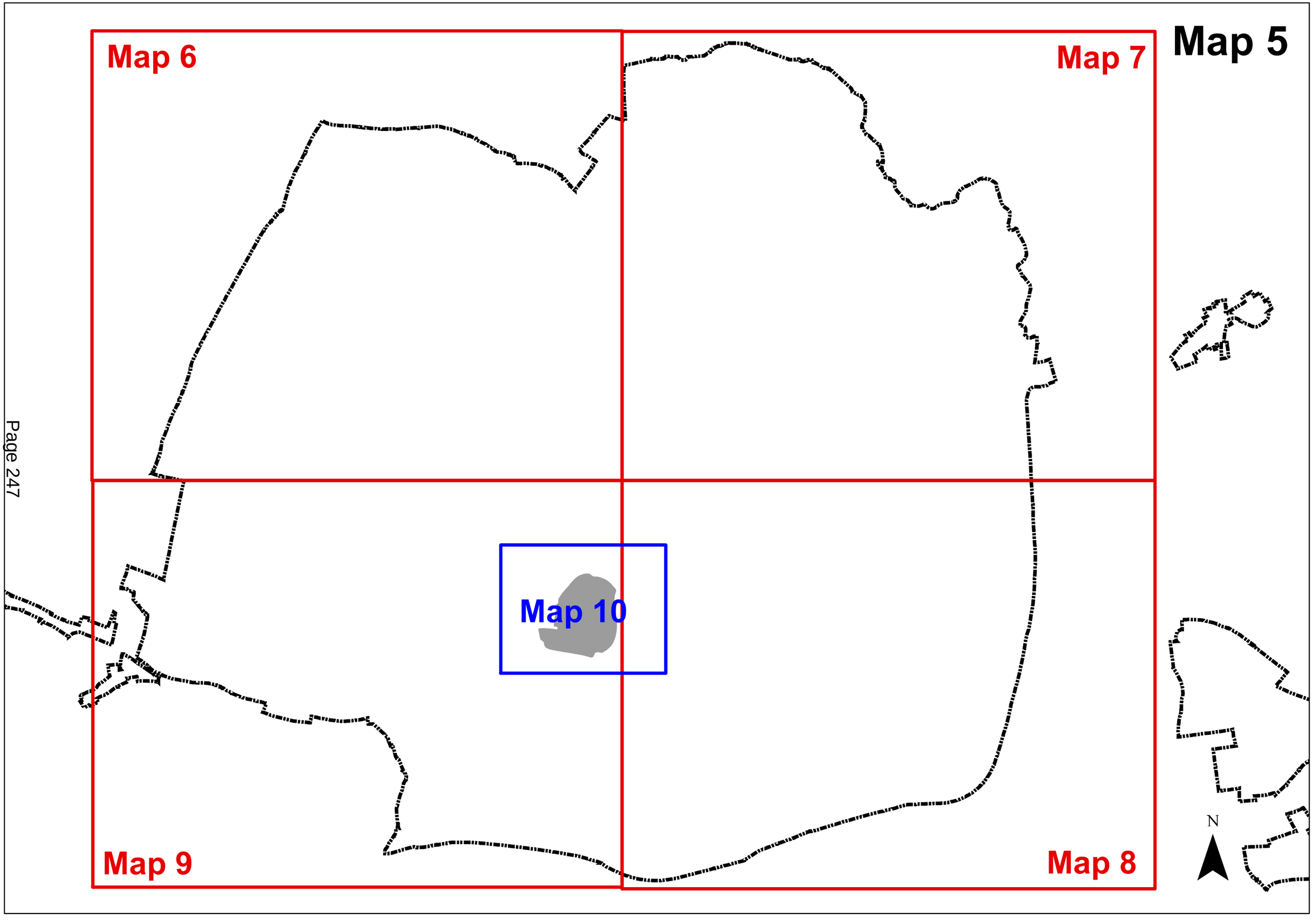
Map 6
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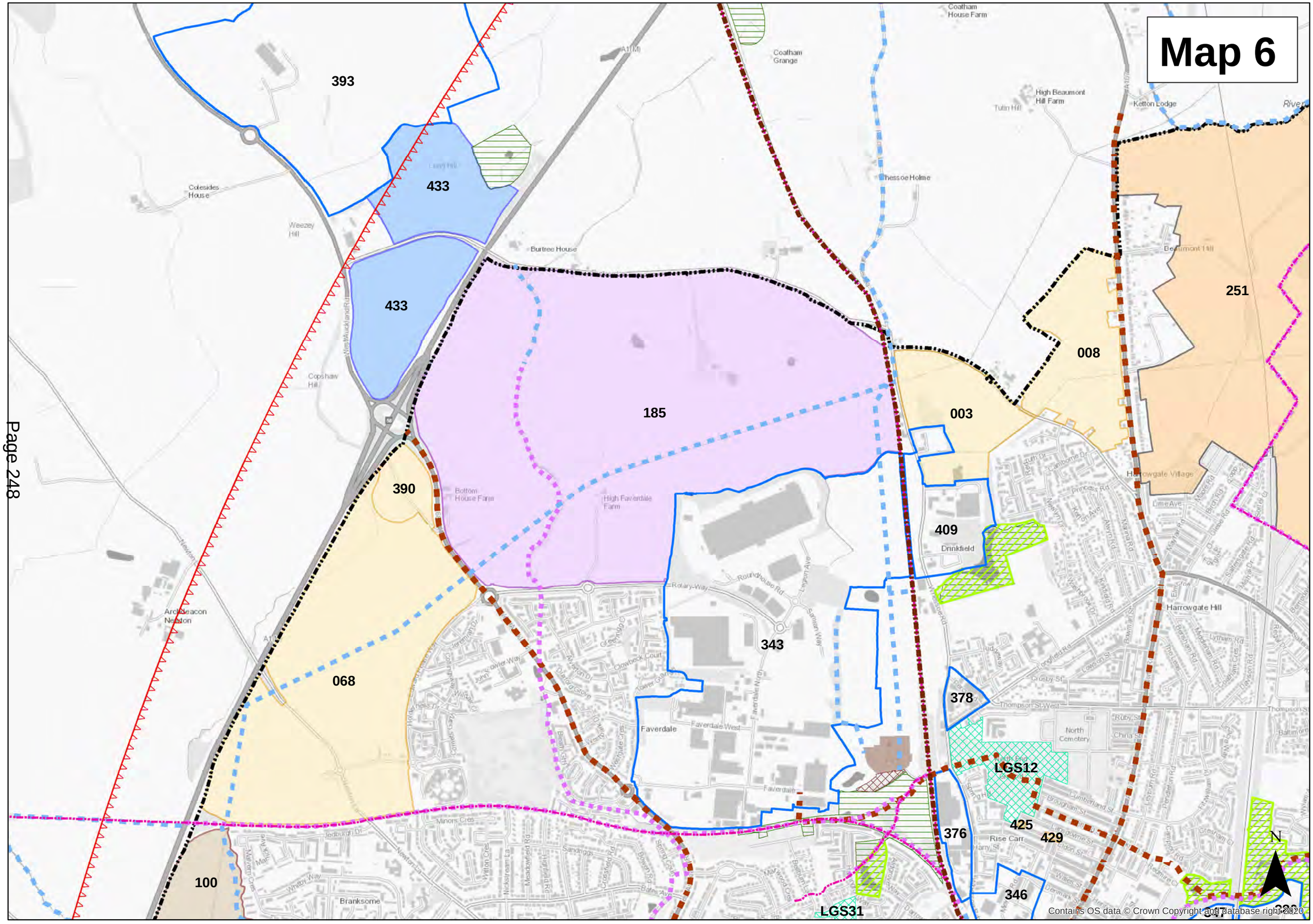
Map 6
393
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003
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068
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LGS12
425
429
376
346
100
LGS31
Coatham House Farm
Coatham Grange
High Beaumont Hill Farm
Tutin Hill
Ketton Lodge
Colesides House
Weezey Hill
Burtree House
Copshaw Hill
Bottom House Farm
High Faverdale Farm
Drinkfield
Harrowgate Village
Harrowgate Hill
Archdeacon Newton
Faverdale
North Cemetery
Rise Carr
Branksome
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Map 7

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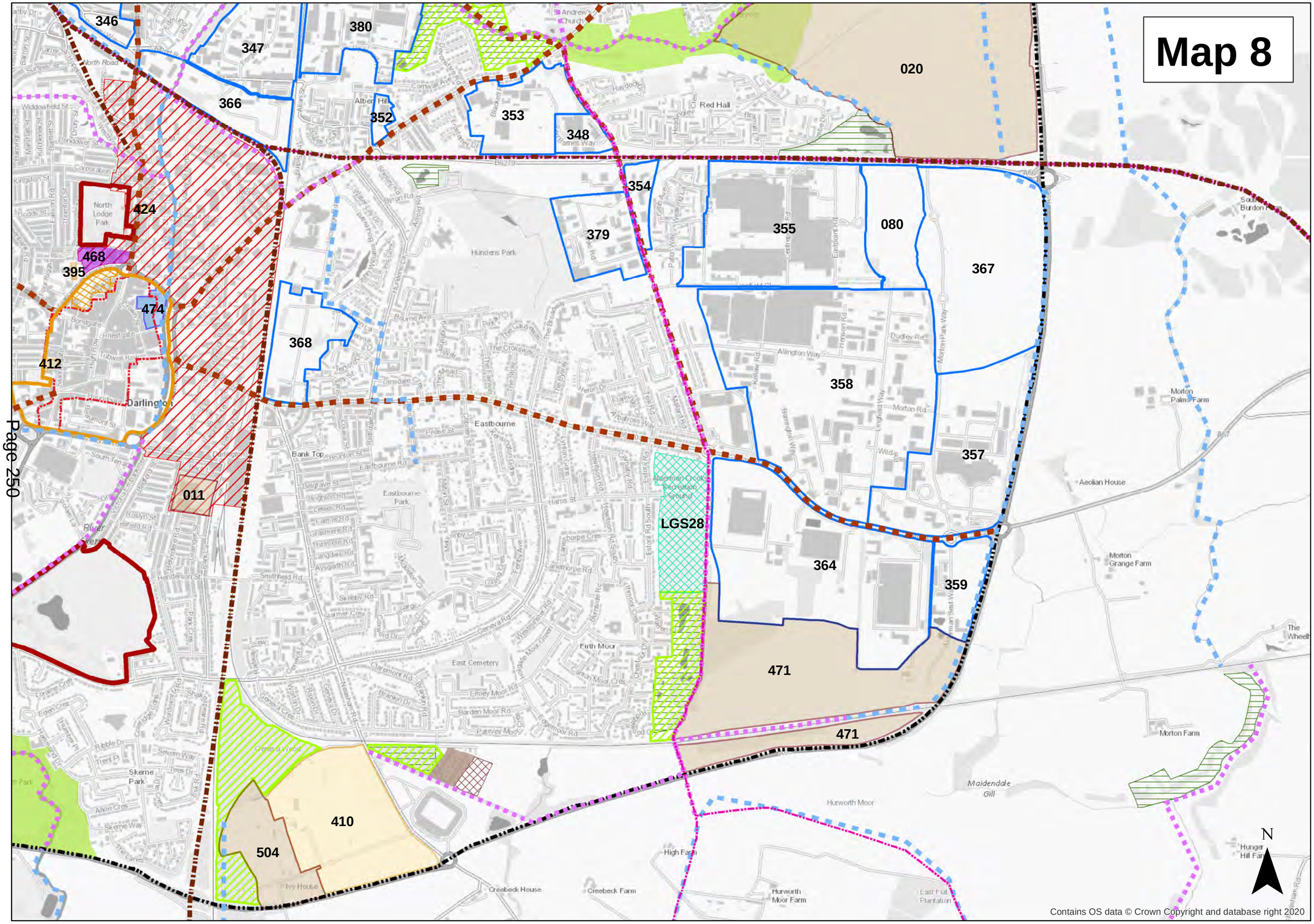
Map 8
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357
011
LGS28
364
359
471
471
410
504
Darlington
Eastbourne
Hundens Park
Red Hall
Alberti Hill
Bank Top
Eastbourne Park
Firth Moor
East Cemetery
Skerne Park
Ivy House
Creebeck House
Creebeck Farm
High Farm
Hurworth Moor
Hurworth Moor Farm
East Flat Plantation
Maidendale Gill
Morton Farm
Morton Grange Farm
Morton Palms Farm
Aeolian House
Hunger Hill Farm
The Wheelh
South Burdon Farm
Alderman Crook Recreation Ground
Andrew's Church
North Lodge Park
Allington Way
Morton Rd
Dudley Rd
Morton Park Way
Eastbourne Rd
Bourne Ave
Hundens Lane
Geneva Wood
N
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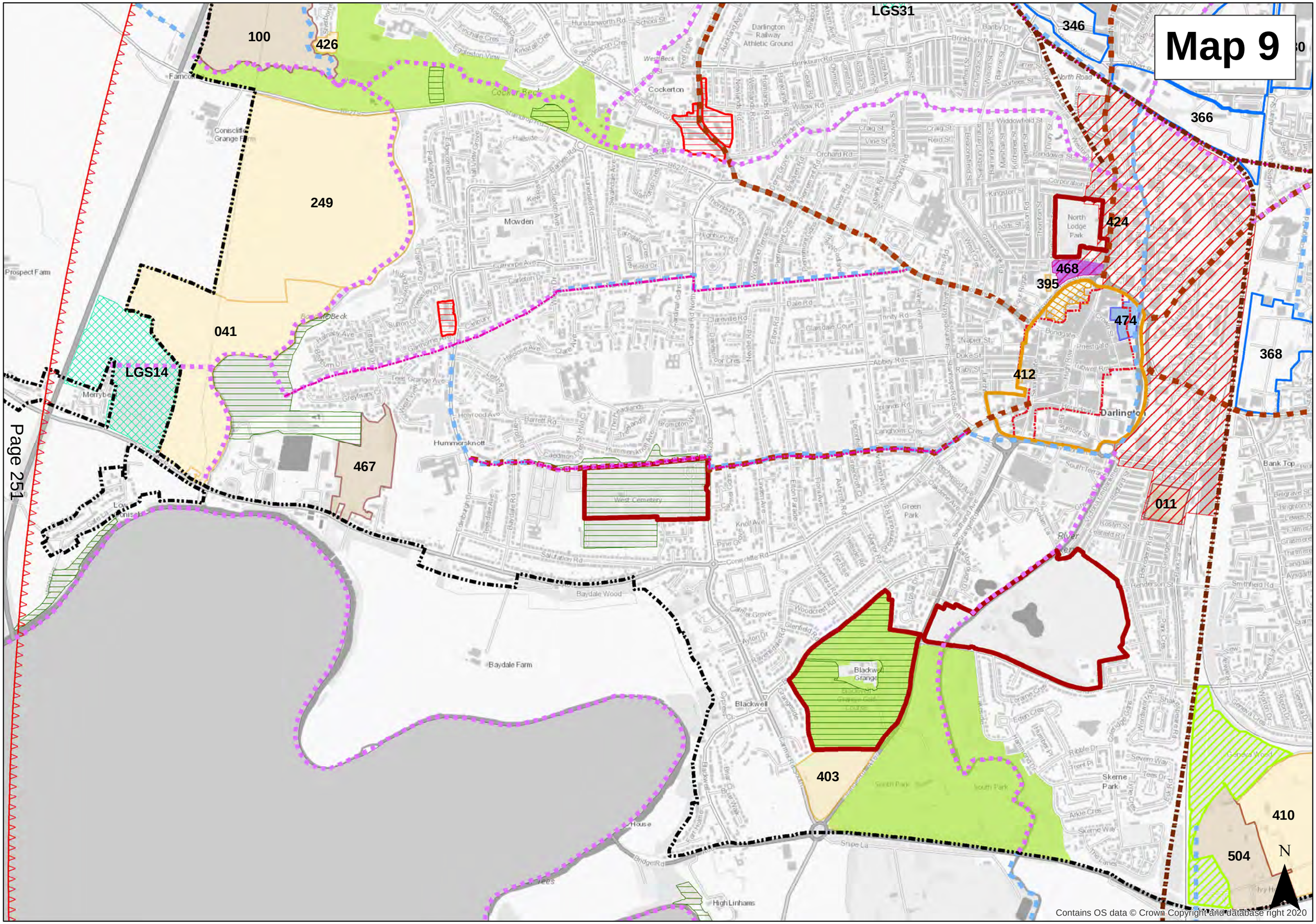
Map 9



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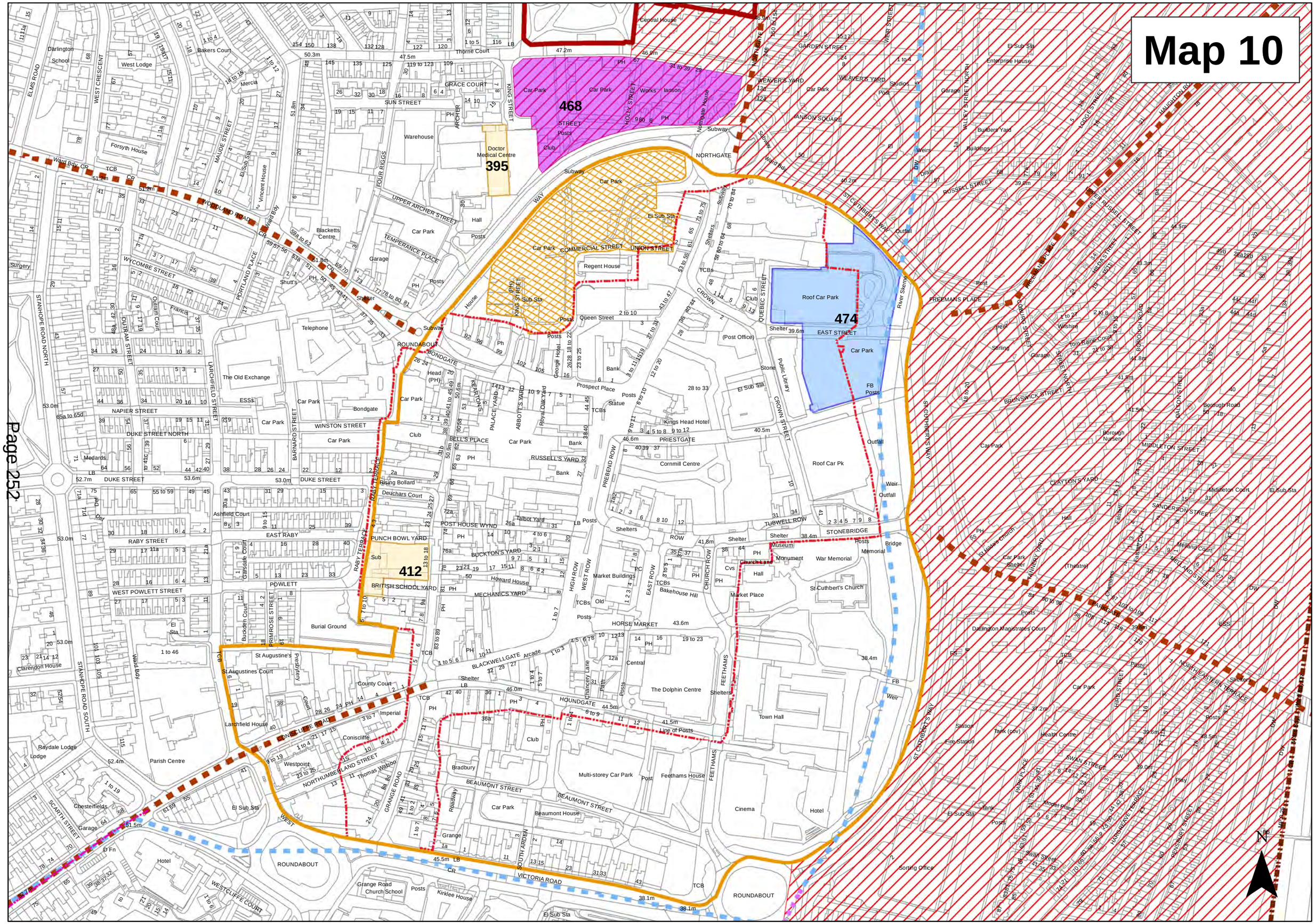
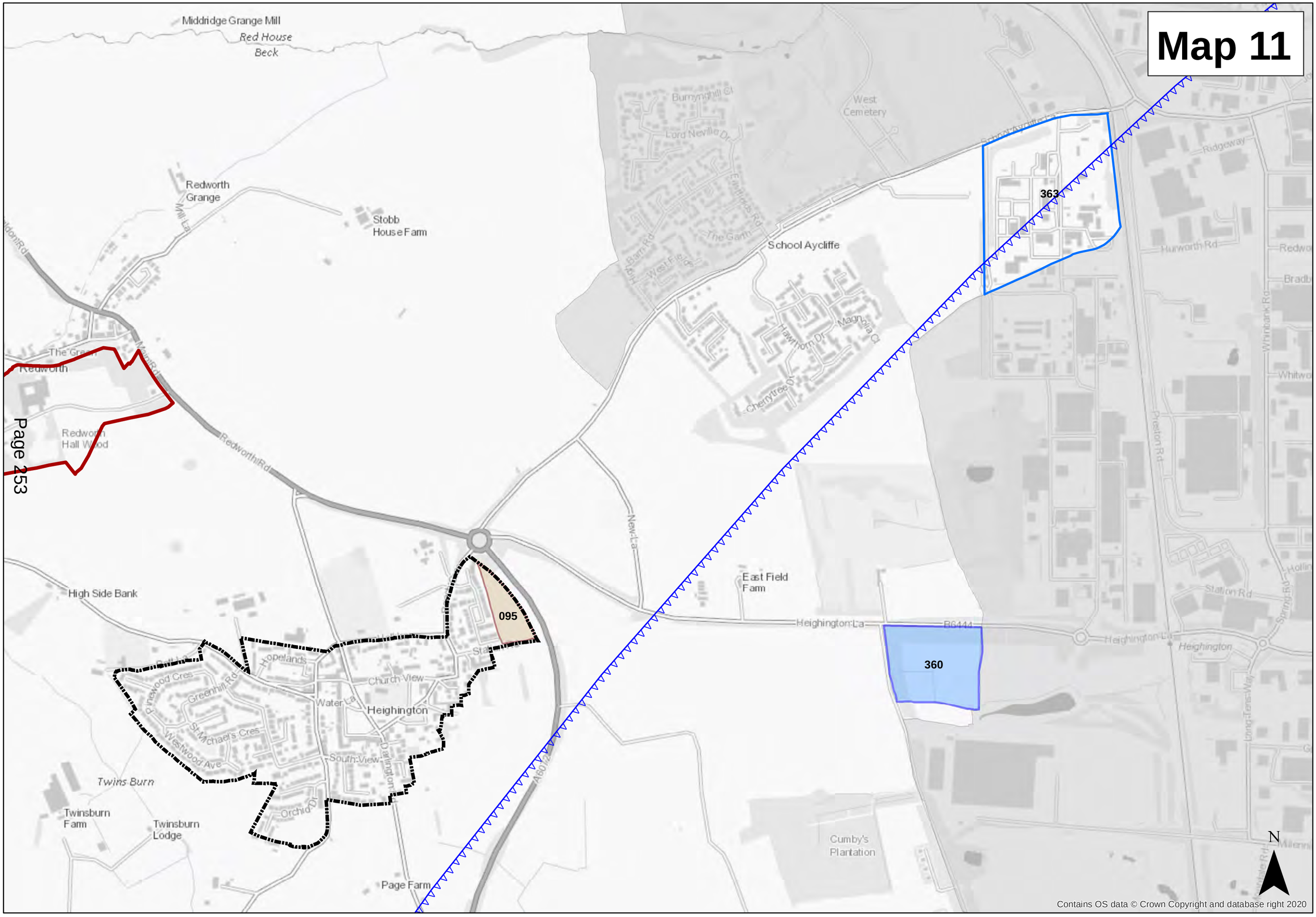
Map 10


468
STREET
395
412
474
EAST STREET
Roof Car Park
Car Park
Central House
Darlington School
West Lodge
Bakers Court
Thorne Court
GRACE COURT
SUN STREET
Warehouse
Doctor Medical Centre
Forsyth House
Vincent House
Blacketts Centre
Garage
Surgery
Shutt's
Telephone
Shelter
ROUNDABOUT
Subway
Ward Bdy
CR
TCB
WOODLAND ROAD
WYCOMBE STREET
PORTLAND PLACE
MAUDE STREET
FOUR RIGGS
UPPER ARCHER STREET
TEMPERANCE PLACE
KING STREET
ARCHER
Hall
Posts
PH
El Sub Sta
Car Park
COMMERCIAL STREET
UNION STREET
Regent House
TCBs
Queen Street
Prospect Place
Statue
Bank
George Hotel
Head (PH)
BONDGATE
Bondgate
The Old Exchange
ESSs
Car Park
NAPIER STREET
WINSTON STREET
DUKE STREET NORTH
DUKE STREET
Medards
Club
BELL'S PLACE
RUSSELL'S YARD
Rising Bollard
Deuchars Court
Ashfield Court
EAST RABY
RABY TERRACE
PUNCH BOWL YARD
Sub
BRITISH SCHOOL YARD
POWLETT
WEST POWLETT STREET
Burial Ground
Buckden Court
PRIMROSE STREET
Garsdale Court
POST HOUSE WYND
Talbot Yard
BUCKTON'S YARD
Howard House
MECHANICS YARD
Market Buildings
PC
HIGH ROW
WEST ROW
EAST ROW
CHURCH ROW
Old
TCBs
Posts
HORSE MARKET
Bakehouse Hill
Market Place
Cvs
Hall
Church Lane
Museum
Monument
War Memorial
St Cuthbert's Church
Shelters
Bridge
Memorial
STONEBRIDGE
TUBWELL ROW
ROW
Shelter
Public Library
Stone
Kings Head Hotel
PRIESTGATE
Cornmill Centre
Roof Car Pk
Outfall
Weir
Outfall
Enterprise House
Studios
Garage
Builders Yard
Buildings
Weirs
Drain
Outfall
NORTHGATE
IANSON SQUARE
WEAVER'S YARD
Works
Ianson
Northgate House
Subway
Ward Bdy
WEAVER'S YARD
Car Park
Studios
Post
GARDEN STREET
VIEWS STREET
VALLEY STREET NORTH
LODGE STREET
HAUGHTON ROAD
RUSSELL STREET
FREEMANS PLACE
ST CUTHBERT'S WAY
River Skerne
Outfall
Roof Car Park
Shelter
(Post Office)
Club
QUEBEC STREET
CROWN
Queen Street
Posts
Bank
George Hotel
Prospect Place
Statue
TCBs
Bank
Public Library
CROWN STREET
El Sub Sta
28 to 33
FB
Posts
Peel
Stirling
Garage
Wilshire
Tom Raine Court
Borough Nursery
Car Park
BOROUGH ROAD
BRUNSWICK STREET
SOUTH NORTH STREET
CORPORATION STREET
DALTON STREET
Borough Road
MIDDLETON STREET
CLAYTON'S YARD
Middleton Court
El Sub Sta
SANDERSON STREET
Hall
Falstaff Court
Melland Court
MELLAND STREET
St Hilda's Church
Car Park
Shelter
(Theatre)
ANNERY YARD
Chambers
PARADISE
Darlington Magistrates Court
Posts
Car Park
Station
Fire Station
Tank (cov)
Health Centre
SWAN STREET
PARK PLACE
HARGHEAVE TERRACE
PENSBURY STREET
Model Place
Play
Tank
El Sub Sta
Posts
Swan Street
Sorting Office
NORTHUMBERLAND TERRACE
Shelters
Car Park
HIGH STREET
Town Hall
Line of Posts
The Dolphin Centre
Shelters
FEETHAMS
Feethams House
Post
Multi-storey Car Park
Bradbury
Club
Cinema
Hotel
Beaumont House
Car Park
BEAUMONT STREET
Roadway
GRANGE ROAD
Thomas Watson
NORTHUMBERLAND STREET
Westpoint
Coniscliffe
CONISCLIFFE ROAD
Larchfield House
Imperial
County Court
St Augustines Court
St Augustine's Presbytery
Chesterfields
Garage
Raydale Lodge
Lodge
Parish Centre
Clarendon House
STANHOPE ROAD SOUTH
SCARTH STREET
WESTCLIFFE COURT
Grange Road Church School
Kirklee House
Posts
ROUNDABOUT
Hotel
D Fn
El Sub Sta
Grange
Car Park
SOUTH ARDEN
Beaumont House
Car Park
BEAUMONT STREET
Feethams House
Post
Multi-storey Car Park
Bradbury
Club
Line of Posts
Town Hall
The Dolphin Centre
Shelters
FEETHAMS
Cinema
Hotel
Sorting Office
ROUNDABOUT
TCB
VICTORIA ROAD
CR
LB
45.5m
38.1m
38.1m
Page 252


Map 11
Middridge Grange Mill
Red House
Beck
Redworth
Grange
Stobb
House Farm
Burnynghill Cl
Lord Neville Dr
West
Cemetery
The Garth
School Aycliffe
Hawthorn Dr
Magnolia Cl
Cherrytree Dr
363
Ridgeway
Hurworth Rd
Whinbank Rd
Preston Rd
The Green
Redworth
Redworth
Hall Wood
Redworth Rd
New La
East Field
Farm
Heighington La
B6444
Station Rd
Heighington
360
High Side Bank
095
Hopelands
Church View
Water La
Heighington
Pinewood Cres
Greenhill Rd
St Michael's Cres
Westwood Ave
South View
Darlington
Orchid Dr
Twins Burn
Twinsburn
Farm
Twinsburn
Lodge
Page Farm
Cumby's
Plantation
N
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Map 12

River Skerne
Roundhill Farm House
Roundhill Rd
Little Beck
Neasham Rd
Brickyard Farm
394
Ashfield
Cree Beck
Creebeck Dr
Blackthorn Dr
Westfield Dr
Mowbray Dr
The Wayside
Friars Pardon
West End
Hurworth-on-Tees
Church
Garden Cottage
Neasham Rd
Spring Cottage
Hilton House Farm
Timmys La
Sanderson Rd
Emerson Rd
Bryan Cl
Strait La
Hill Top Farm
Glebe View Farm
The Cottage
A167
Croft Rd
Manor Rd
Woodlands Way
Elmfield Rd
The Mill Race
Rectory La
Croft-on-Tees
Low Wood
Blind La
Low Hail
Low Hail Cottage
Pilmore Mews
Armstrong House
N

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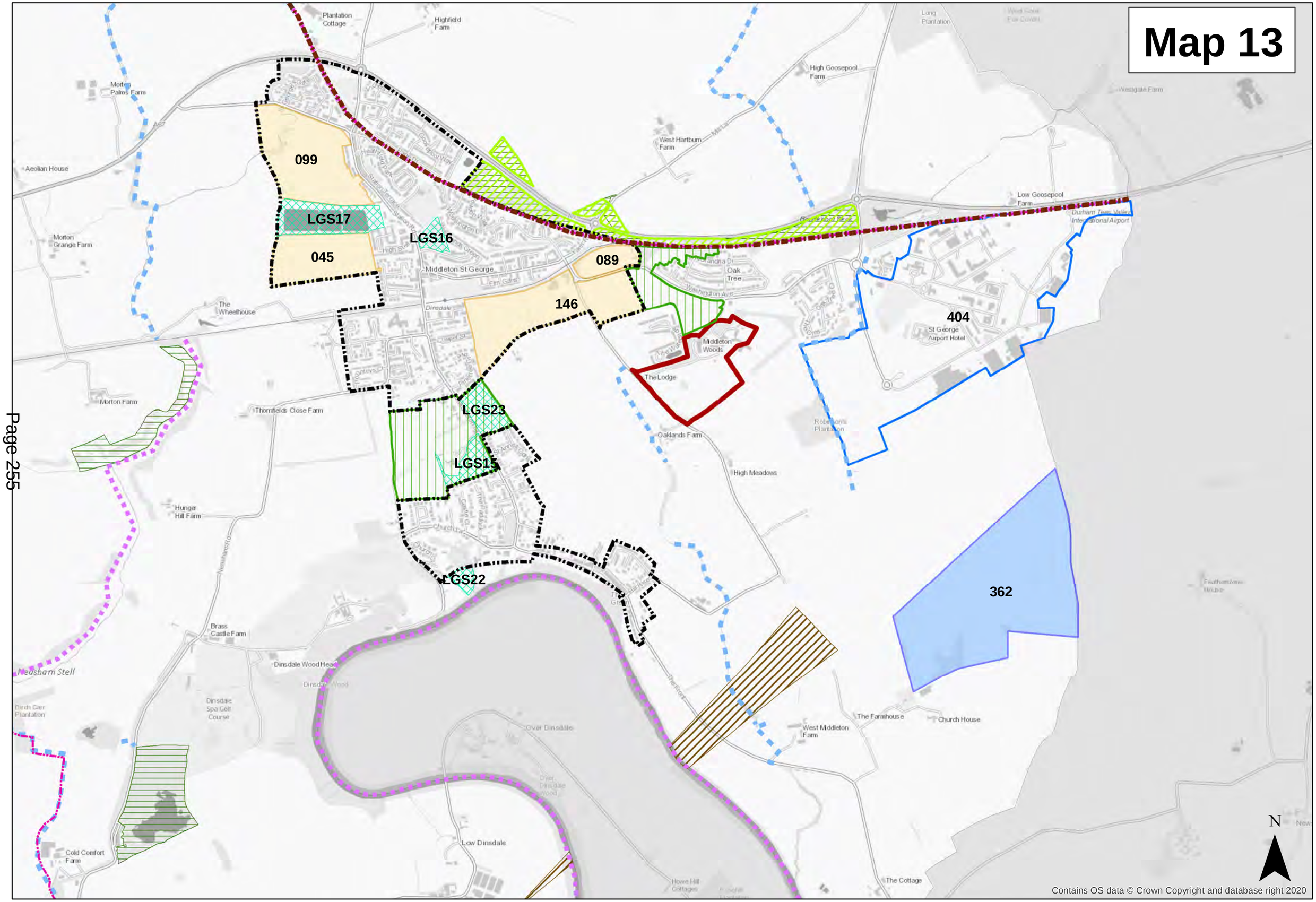
Map 13
099
LGS17
LGS16
045
089
146
404
LGS23
LGS15
LGS22
362
Plantation Cottage
Highfield Farm
Morton Palms Farm
Aeolian House
Morton Grange Farm
The Wheelhouse
Morton Farm
Thornfields Close Farm
Hunger Hill Farm
Brass Castle Farm
Dinsdale Wood Head
Dinsdale Spa Golf Course
Birch Carr Plantation
Cold Comfort Farm
Low Dinsdale
Over Dinsdale
Middleton St George
Middleton Woods
The Lodge
Oaklands Farm
High Meadows
West Hartburn Farm
High Goosepool Farm
Low Goosepool Farm
Oak Tree
St George Airport Hotel
Durham Tees Valley International Airport
Westgate Farm
Long Plantation
Robinson's Plantation
West Middleton Farm
The Farmhouse
Church House
The Cottage
Howe Hill Cottages
Featherstone House
Neasham Stell
N
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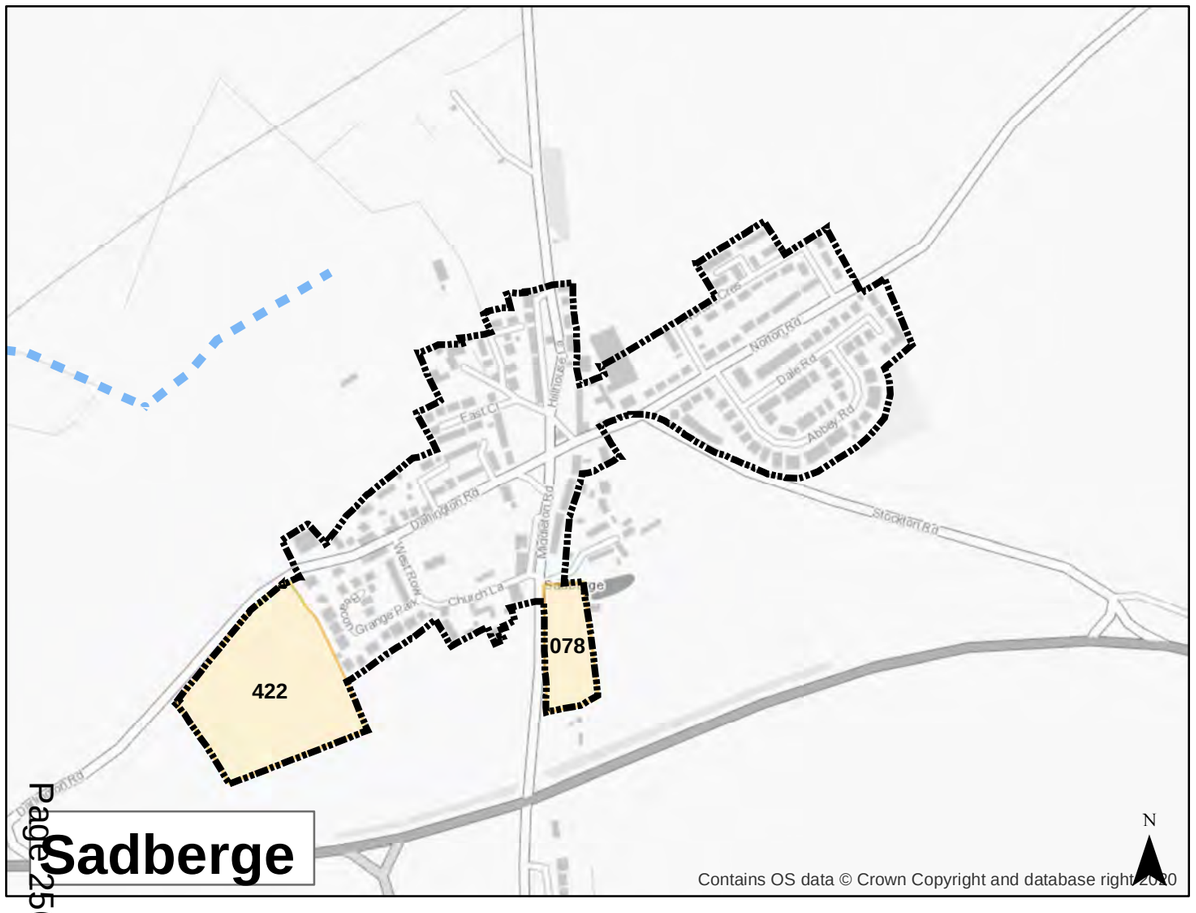
Map 14


422
078
Sadberge
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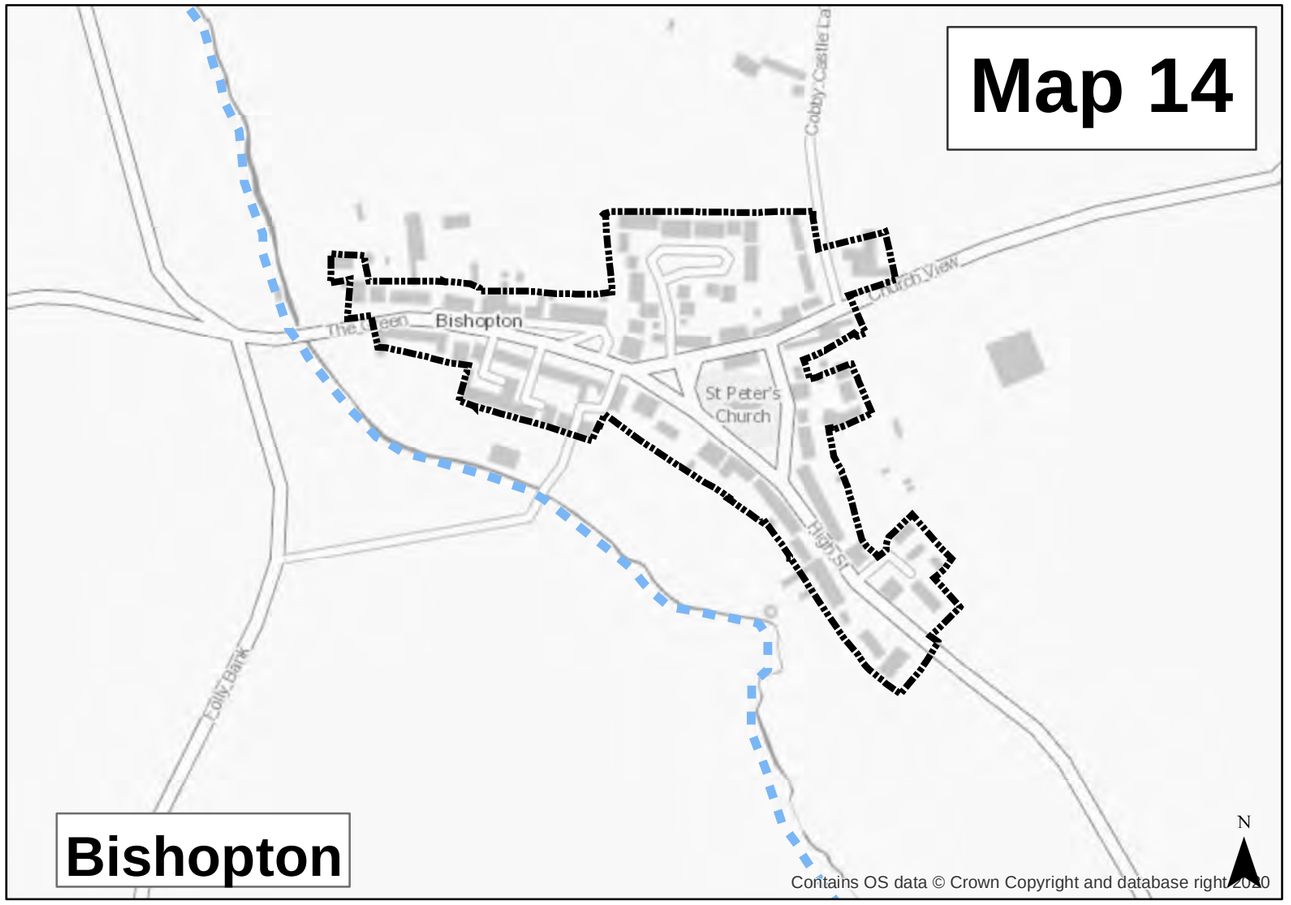
Bishopton
St Peter's Church
Bishopton
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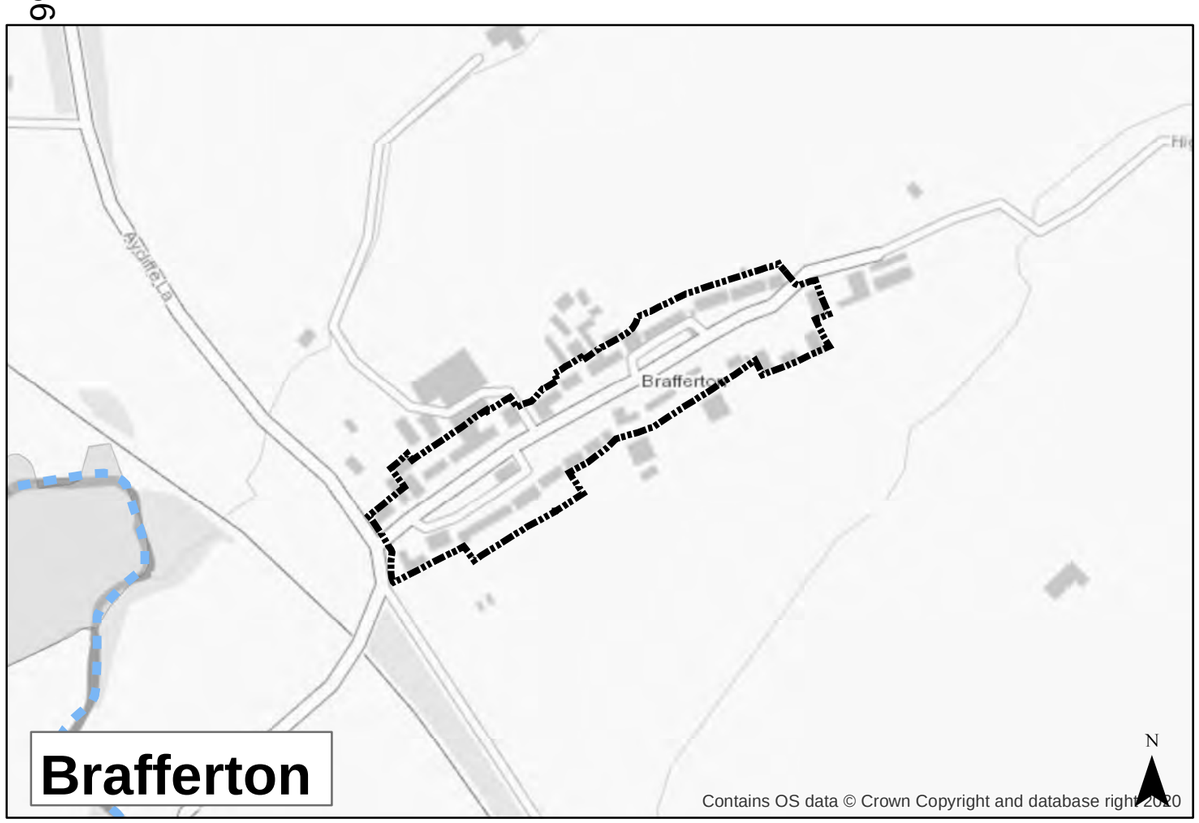
Brafferton
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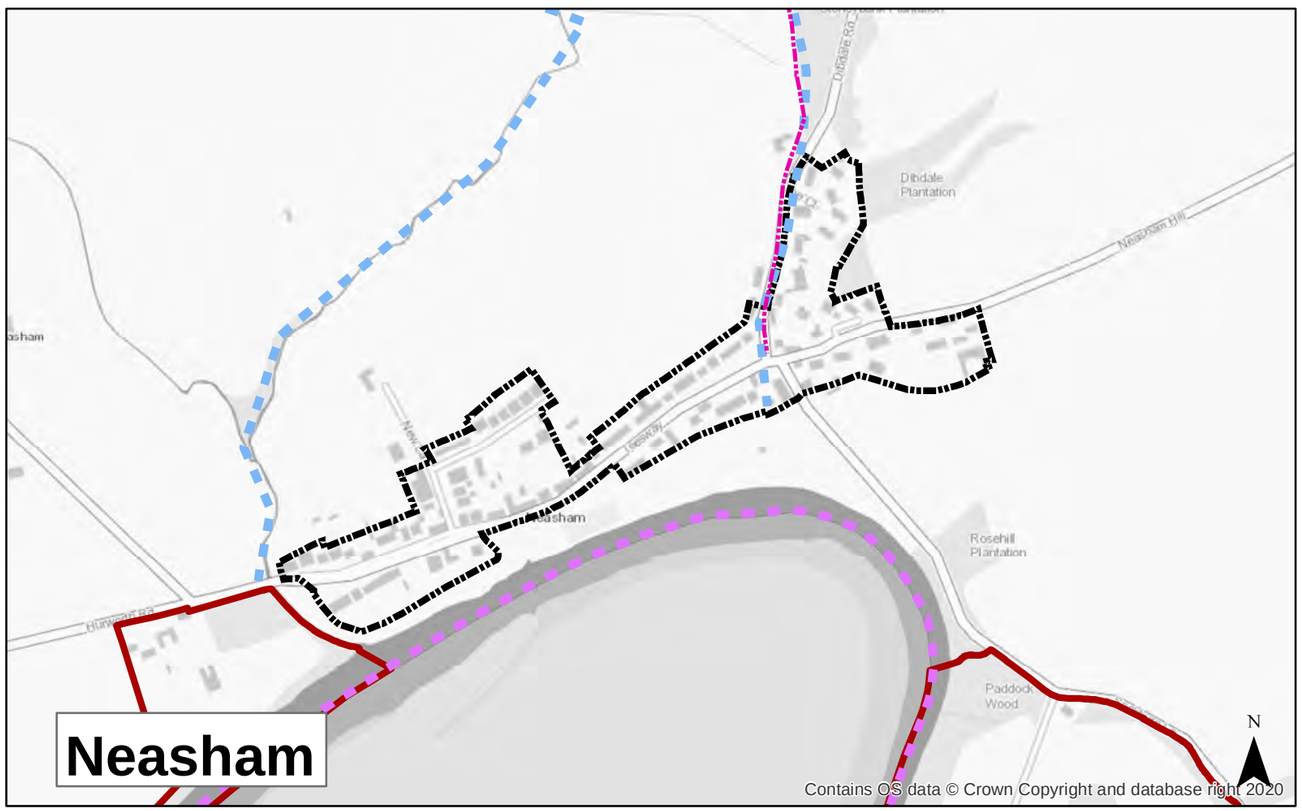
Neasham
Dibdale Plantation
Rosehill Plantation
Paddock Wood
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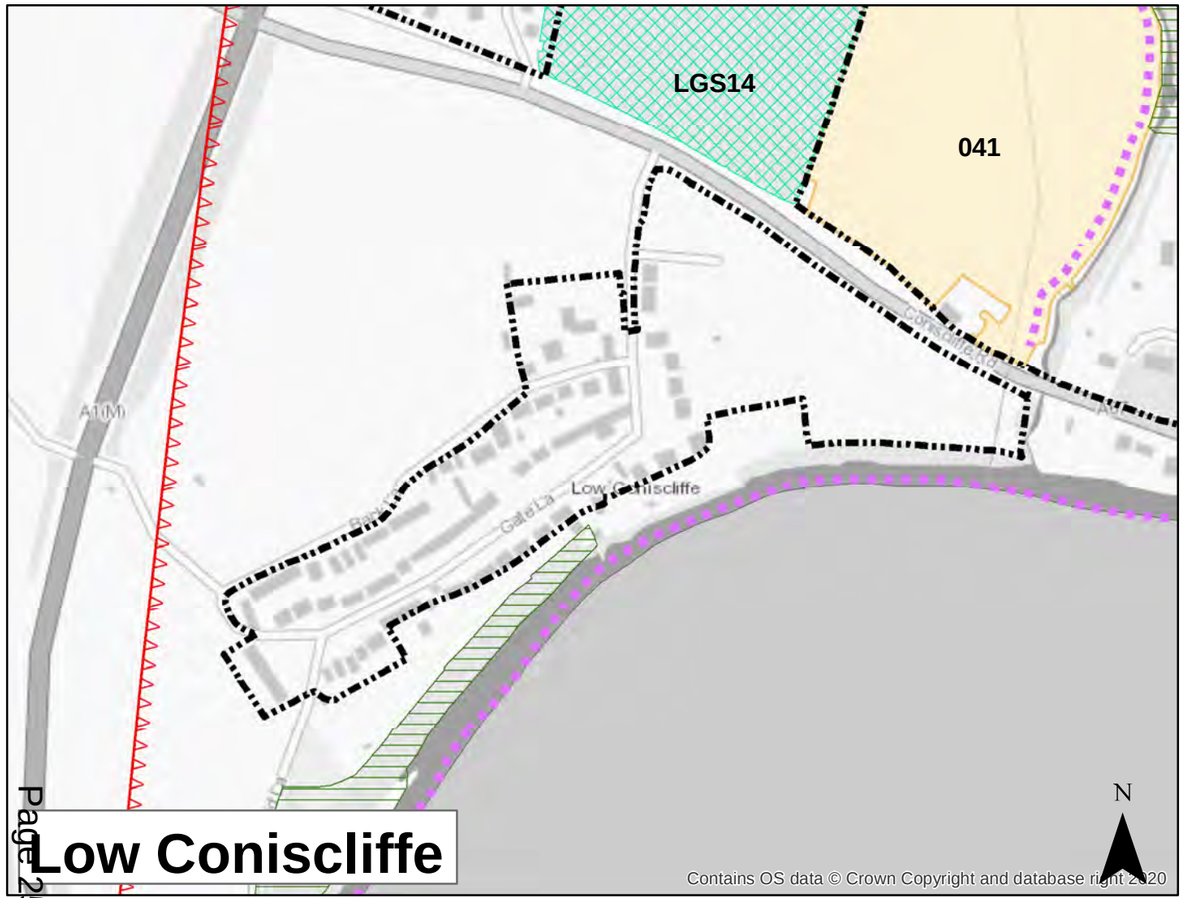
Map 15


LGS14
041
A1(M)
Low Coniscliffe
Gate La
N
Low Coniscliffe
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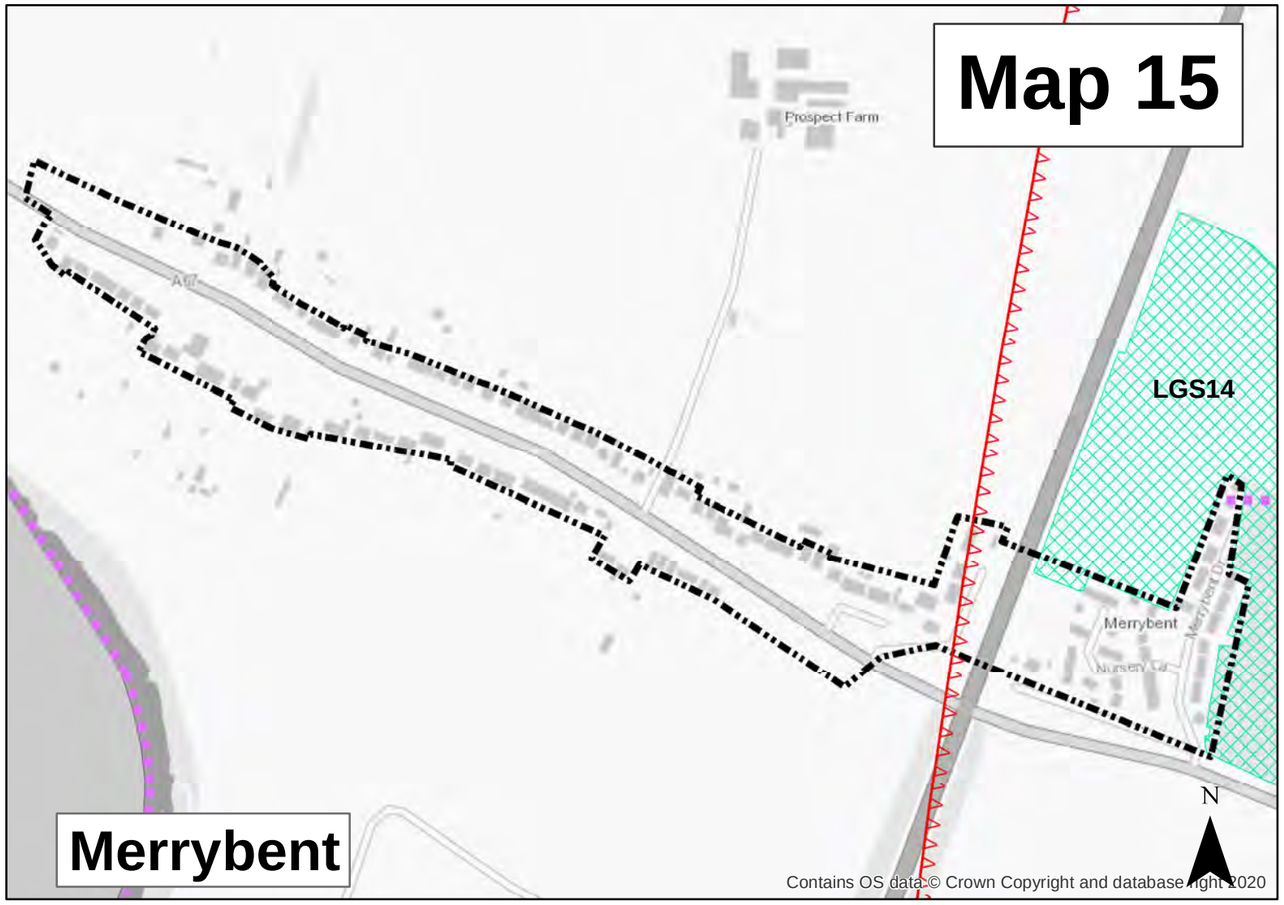
Prospect Farm
A67
LGS14
Merrybent
Nursery Cot
N
Merrybent
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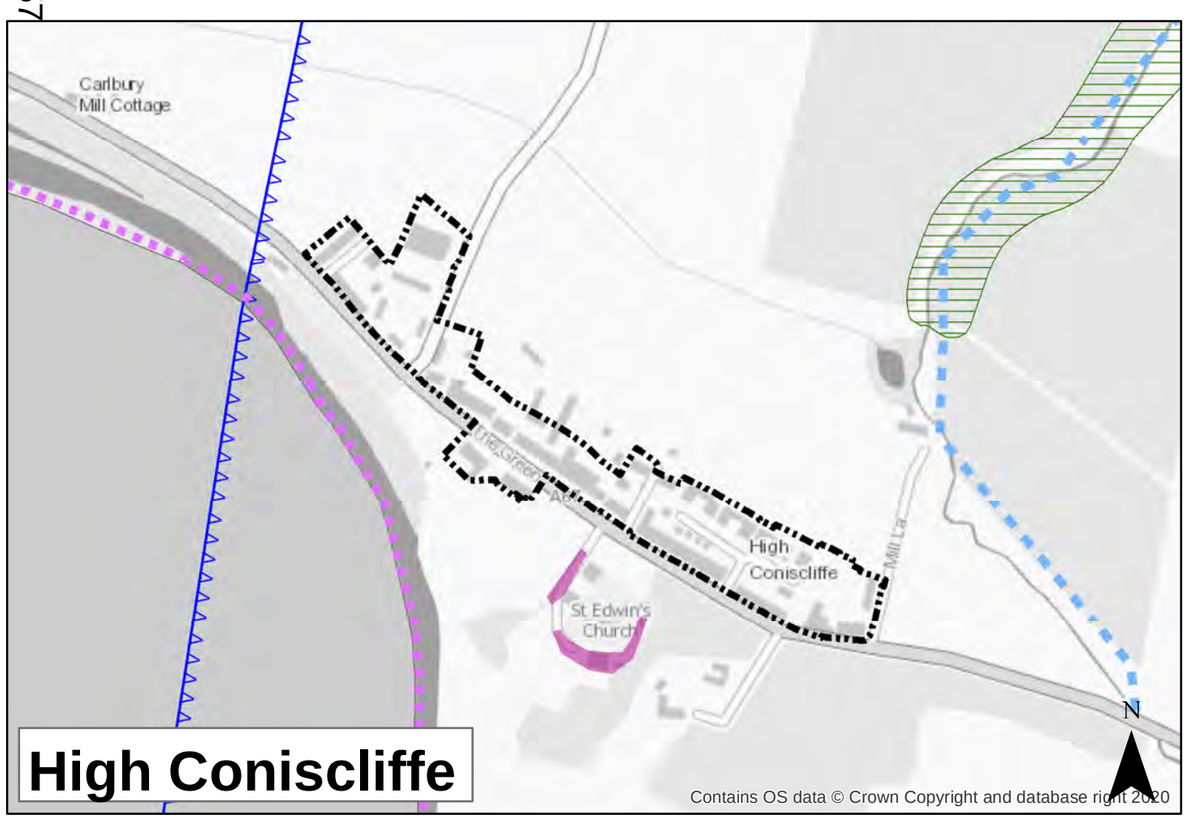
Carlbury
Mill Cottage
A67
The Green
Mill La
High
Coniscliffe
St Edwin's
Church
N
High Coniscliffe
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A67
Carlbury
Piercebridge
St Mary's
Church
N
Piercebridge
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KEY

Development Limits (SD3)

Housing Allocation (H2)*

Housing Commitment*

Skerningham Allocation (H2) & (H10) & (E2)*

Burtree Allocation (H2), (H11) & (E2)*

Mixed Use Allocation (H2) & (H10) & (E2)*

Existing Council Gypsy & Traveller Sites (H12)

Proposed Extension to Council Gypsy & Traveller Sites (H12)

Safeguarding Existing Employment Opportunities (E1)*

Employment Allocation (E2)*

Stockton & Darlington Railway (ENV2)

Historic Routes (ENV3)

Green Wedges (ENV3)

Rural Gaps (ENV3)

Parklands (ENV3)

Proposed Green Corridors (ENV4)

Existing Green Corridors (ENV4)

Local Green Space (ENV6)

Local Nature Reserves (ENV7)

Local Wildlife Sites (ENV7)

Local Geological Sites (ENV7)

Town Centre Boundary (TC1)

Primary Shopping Area (TC2)

Additional Site for Town Centre Uses (TC3)

District & Local Centres (TC4)

Darlington Town Centre Fringe (TC6)

Key Sustainable Transport Corridors (IN1)

Civil Aviation Authority Public Safety Zone (IN5)

Civil Aviation Authority - Bird Strike Hazard Area (IN5)

Civil Aviation Authority Public - Radius of Critical Airspace (IN5)

Area Outside of Darlington Borough Council

* Numbers refer to site Reference

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This document was classified as: OFFICIAL

LPR reference (start)	Topic	Name	Organisation	Agent name and address	Site / Policy / Sectio	Site Details	Policy Details	Section Details	Object /Support/ Ne	Comments	Comment Summary	Officer Response	Change Required Ye	Proposed Changes
LPR029j	Visions, Aims, Objectives	David Phillips	Butterfly Conservation North East		Section			2. Visions, aims and objectives	Support	A little difficult to comment on this Draft Local Plan Review 2025-2042 when the Tees Valley Local Nature Recovery Strategy has not yet been published and the Sustainability Appraisal refers to the out-of-date Tees Valley Biodiversity Action Plan. the Strategic Environmental Assessment is work in progress and the Habitats Regulations Assessment is still to be developed. Further, the Land Use Framework (LUF) for England whilst published is undergoing a 12-week consultation period with stakeholders. This consultation coincides with your Draft Local Plan consultation. No doubt there will be opportunities later in the year to comment further as the plan and the above policies evolve. Item 1.5.2. There is evidence strongly supporting the positive impacts of green and blue space on people's physical and mental health so nature recovery should be at the heart of our economy and development and not as an after-thought. Nature Recovery needs to be included as a key priority within the Darlington Borough Draft Local Plan Review 2025-2042.	Timing of consultation not ideal with numerous linked work either in development or also out for consultation. Suggested atddditions to Council Plan Key Priorities.	Section 1.5.2 relates to the approved council plan so whilst the benefits are acknowledged the cannot be changed.	No	
LPR052a	Visions, Aims, Objectives	Louise Tait	Environment Agency		Section			2. Vision, Aims and Objectives	Neutral	Aim 5 Part d of Aim 5 details the following objective: 'Mitigate flood risks through environmental and ecological improvement of the River Skerne and River Tees.' We recommend including other main river tributaries of the Skerne and Tees in this objective as the tributaries are intrinsically linked to the River Skerne and River Tees. We also recommend including further objectives. One objective would be to protect and enhance the water quality of all waterbodies. Another suggested objective would be to protect and enhance groundwater and surface water quality and quantity. Some possible wording for this objective is outlined below: 'Development proposals should protect, and where possible enhance, groundwater and surface water quality and quantity. Developments should not create a pollution pathway to surface water or the underlying groundwater aquifers and there should be no detrimental impacts to surface water or groundwater volumes or flow (e.g. impact to water dependent features or increased flood risk).' Aim 6 Part a of Aim 6 details the following objective: 'Manage flood risk from all sources' We recommend that this objective is expanded upon to consider issues on designing new houses and development to avoid, or be resilient to, future flood risk as this aim specifically tackles climate change.	Refinement and additions to Aim 5 recommended to reffer to 'tributories of the Skerne and Tees'. Further objectives also recommended.	Support the inclusion of 'tributories'. We will look at including the further objectives although as suggested they may be a bit too detailed.	Yes	
LPR071b	Visions, Aims, Objectives	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Section			2. Visions, Aims and Objectives	Support	Our client supports the updated version of the Local Plan Vision, with the joint venture between Homes by Esh and Darlington Borough Council an exemplary example of public and private sectors working together to deliver a better quality of life for residents of Darlington.	Support for vision.	Support noted.	No	
LPR104c	Visions, Aims, Objectives	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621218	Section			2. Visions, Aims and Objectives	Unknown	3.1 Taylor Wimpey consider that the Council's approach to the Local Plan needs to reflect national policy and guidance and deliver the ambitions for housing and economic growth. Justification 3.1 The Vision needs to reflect national and regional policy ambitions. Nationally, the Government is seeking to deliver 1.5m new homes and the housing crisis is a key policy issue to address over this parliamentary period. This flows through Written Ministerial Statements and the new Framework, which includes updated guidance and minimum housing targets, which the Vision should set out to achieve. 3.2 Furthermore, the Government seeks to increase economic growth, which is important to address prosperity and living standards, consistently highlighting that "sustained growth is the only route to improving prosperity of our country". 3.3 The Vision therefore should enshrine raising living standards, improving economic growth and linking housing targets to employment growth ambitions. 3.4 Furthermore, as mentioned in our General Comments, Taylor Wimpey considers that the Plan should cover an appropriate period. In accordance with the Framework that is at least 15 years from adoption. Therefore, there is the possibility that the 2042 date should be extended to at least 2045 and further if the large proposed urban extensions are included. Proposed Approach 3.5 To address the comments, the following approach is proposed: P4723-SPA-RP-TP-001-A • Reflect national and regional policy ambitions. • Reflect the evidence. • Update Vision and Objectives to be clear and concise.	Plan period should be for more than 15 years.	The plan period is sufficent with the base date being 2025 it is 17 years. Adoption is anticipated in 2027 so that still allows 15 years from adoption with a review necessary within 5 years.	No	
LPR105c	Visions, Aims, Objectives	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621220	Section			2. Visions, Aims and Objectives	Unknown	Taylor Wimpey consider that the Council's approach to the Local Plan needs to reflect national policy and guidance and deliver the ambitions for housing and economic growth. The Vision needs to reflect national and regional policy ambitions. Nationally, the Government is seeking to deliver 1.5m new homes and the housing crisis is a key policy issue to address over this parliamentary period. This flows through Written Ministerial Statements and the new Framework, which includes updated guidance and minimum housing targets, which the Vision should set out to achieve. 3.2 Furthermore, the Government seeks to increase economic growth, which is important to address prosperity and living standards, consistently highlighting that "sustained growth is the only route to improving prosperity of our country". The Vision therefore should enshrine raising living standards, improving economic growth and linking housing targets to employment growth ambitions. Furthermore, as mentioned in our General Comments, Taylor Wimpey considers that the Plan should cover an appropriate period. In accordance with the Framework that is at least 15 years from adoption. Therefore, there is the possibility that the 2042 date should be extended to at least 2045 and further if the large proposed urban extensions are included.To address the comments, the following approach is proposed: Reflect national and regional policy ambitions. • Reflect the evidence. • Update Vision and Objectives to be clear and concise.	See response to LPR104c above.	See response to LPR104c above.	No	

LPR120a	Visions, Aims, Objectives	Councillor Bryony Holroyd			Section			2. Visions, Aims and Objectives	Neutral	a.We believe the plan is unsustainable, and vastly over-provides for the housing needs of the town. [This is emphasised by the change in housing need to 446 homes per year, so that with the shortfall in delivery from the previous 5 years, the amount required to be delivered remains at 492 per year. This shows calculations are based on deliverability, and unrelated to local housing need. Over-supply results in wasted resources, unnecessary environmental damage (land take, biodiversity destruction and transport).] Planning policy must plan for the numbers and types of homes needed in Darlington, not what is "deliverable". We recognise the housing need target is now set by government. We disagree strongly with the government's method of calculating this high housing need target, and urge a return to local target setting based on local needs. b.Over-provision of housing allocations on green fields makes it harder to pressure developers to build on brownfield sites & town centre margins (they'll choose what's "easiest"), leaving the council to deal with these more complex and expensive sites, or a doughnut of deprivation around the town centre as people move outwards to "more desirable" areas. If greenfield allocations are not removed, outer sites must have phasing / a timetable set before which applications will not be considered. c.In combination with over-supply, large sites are also a risk for house-buyers, and stagnation. Mortgage companies have "over-exposure limits" of c. 20% of any site, after which they will not offer further mortgages on the same site. This means later buyers on a site may struggle to obtain the most competitive mortgage rates, reducing their purchasing power, so slowing sales and hence build-out on the site. Guidance should be included to subdivide large sites to reduce this risk to delivery. d.An estimate of the average number of windfall sites which come forward, not previously planned for, each year (homes on small sites not allocated for housing, e.g. small infill or redeveloped commercial sites) isn't accounted for - planned no. of new homes needed should be reduced by this number to prevent more over-supply. e.Housing types must also match the needs of the town, with an ageing population, more desirable, accessible and highly insulated flats and bungalows will be required for retirees to	Housing need figures are too high. Disagreement with government standard method.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	No	
LPR127, 128 & 129b	Visions, Aims, Objectives	Ros Kain	Historic England		Section			2. Visions, aims and objectives	Support	2.1.2 Overarching aims. Protect and enhance the quality of Darlington's built, natural and historic environment, and to use it positively to create great places.	General support for overarching aims.	Noted	No	
LPR127, 128 & 129c	Visions, Aims, Objectives	Ros Kain	Historic England		Section			2. Vision, aims and objectives	Neutral	We support the Local Plan objective in 4a to protect, maintain and enhance Darlington's historic environment and identity as a historic market town, set amongst countryside and surrounding villages with strong links to Railway, Quaker and Industrial heritage. Darlington's historic environment can contribute to other objectives. Include Darlington's heritage as a driver to achieve other objectives in the introduction.	Suggest inclusion of Darlington's heritage as a driver to achieve other objectives.	Importance of heritage has been strengthed within the objectives.	Yes	
LPR061b	Vision, Aims and Objectives	Councillor Kate Mam	Hummersknott Ward		Section			2. Vision, aims and objectives	Object	Under Local Plan Vision on page 16, I contend that the first sentence 'In 2042 Darlington Borough will have maintained its identity as a cohesive, historic market town situated amongst countryside and villages,……' is in doubt given the above cited factors. Under Specific Aims and Objectives, point 5, especially a), b) and c), while this may well be an objective, I query whether this is a realistic aim, given all the points I have raised in this Local Plan Review submission. I consider the bias towards deliverability as opposed to a focus on actual housing needs to be flawed. The Local Plan overprovides for housing need and is skewed towards the purposes of the council rather than the real needs of the residents of Darlington. Oversupply results in wasted resources and totally unnecessary environmental damage. Moreover, the overallocation of greenfield sites reduces the capacity to force developers to develop brownfield sites, which the NPPF categorically states should be prioritised in site selection.	The local plan overprovides housing which would conflict with the vision of the plan. The allocation of greenfield rather than brownfield sites is a key issue.	These comments are noted however the local plan is looking to allocate a defendable ammount of housing to meet the boroughs needs. This will need to be demonstarated and tested through robust evidence.	No	

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Sec	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR076e	Sustainable Development	Ruairi Feakes	Durham Police and Crime Commissioners Office		Section			3. Sustainable development	Neutral	1. Growth, Policing Demand and Infrastructure Capacity The scale of housing and employment development proposed within the Draft Local Plan has the potential to place significant additional demand on local policing and wider criminal justice services. The PCC strongly encourages the Council to ensure that the Local Plan explicitly recognises: • The cumulative policing impact of new residential and mixed-use developments. • The need for appropriate mitigation and funding mechanisms to support increased service demand arising from growth. • Early and ongoing engagement with Durham Constabulary and the Office of the Police and Crime Commissioner (OPCC) when planning significant developments. Without adequate mitigation, growth risks stretching already pressured policing resources and negatively impacting public confidence and community safety.	Comment on cumulative impact of increasing population on police services and need to consider contributions towards mitigation.	At present we are not looking to seek developer contributions towards policing but this will be kept under review.	No	
LPR059 & 60l	Sustainable Development	Dominic Crowley	Lichfields		Policy		SD1 – Presumption in Favour of Sustainable Development (strategic)		Object	Hallam Land Management Limited (herein referenced as Hallam Land) note the Council's intention to update Policy SD1 to reflect the updated wording of the National Planning Policy Framework ('NPPF') (December 2024) in respect of the 'Presumption in Favour of Sustainable Development'. We note that repeating text from the NPPF is not necessary within a Local Plan as any planning application determination would need to be aligned with this (or any such subsequent version noting that the Government has already consulted on a new version of the NPPF) in any case. With this in mind, and in the context of a national drive to significantly simplify Local Plans, including the removal of any duplication with national planning policy, we do not consider reiteration of the presumption in favour of sustainable development under revised Local Plan Policy SD1 to be necessary.	Duplication of wording in the NPPF is uneccessary and over complicates the plan.	We agree in principle that duplication should be avoided however in terms of clarity to the reader we think it makes sense to retain this fundamental principle within the plan.	No	
LPR071c	Sustainable Development	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy		SD1 - Presumption in Favour of Sustainable Development		Neutral	This policy simply replicates the wording of the Presumption in Favour of Sustainable Development contained in paragraph 11 of the NPPF, with the wording being updated to reflect the current December 2024 National Planning Policy Framework ('NPPF'). Replicating the wording of the NPPF does not add anything to the plan, and indeed paragraph 16d of the NPPF actively instructs local planning authorities to avoid duplication of policies contained in the NPPF itself. It is therefore unnecessary. Furthermore, is expected that a new NPPF will be published later this year which is likely to fundamentally change the Presumption in Favour of Sustainable Development (as outlined in the recent consultation draft), then it is likely to be the case that Policy SD1 would be rendered out of date upon adoption. This further reinforces the view that the Council should delete Policy SD1 as it is unnecessary and is likely to be ineffective at the point of the plan's adoption.	Duplication of wording in the NPPF is uneccessary and over complicates the plan. The new NPPF is likely to change the presumption in favour if sustainable development.	We agree in principle that duplication should be avoided however in terms of clarity to the reader we think it makes sense to retain this fundamental principle within the plan. This plan review will be asessed on the content of the current NPPF.	No	
LPR064 & 065	Sustainable Development	Nick Pleasant	Stantec on behalf of Vistry		Policy		SD1 - Presumption in Favour of Sustainable Development (strategic)		Support	Vistry welcomes the amendments to Policy SD1, aligning with the revised wording of the NPPF update December 2024. The amended policy now appropriately reflects the revised test for refusing planning permission, requiring a "strong" reason for refusal rather than the previous reference to a "clear" reason.	Support for updated wording.	Support noted.	No	
LPR087x	Sustainable Development	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy SD1 - Presumption in Favour of Sustainable Development		Support	Draft Policy SD 1 now includes some additional text taken directly from paragraph 11(d) of the December 2024 NPPF. This includes replacing "clear" with "strong" at the first bullet point, as well as including reference to key policies for directing development at the second bullet point. Given Darlington Borough Council submit the Local Plan Review to the Planning Inspectorate for examination by 31st December 2026, as expected, then the Council will be aware that the Publication Plan will benefit from transitional arrangements as set out under Annex 1 of the December 2024 NPPF. However, it is likely that any planning application determined at the time of adoption will be subject to the policy and guidance set out within a revised NPPF. Following recent consultation, it is widely considered that a new NPPF will be published prior to the end of 2026, or summer 2026 at the earliest. As such, the principles underpinning the presumption in favour of sustainable development, as set out in the December 2024 NPPF are anticipated to change, consistent with the approach outlined in the consultation draft. At this stage, the Council's attention should be drawn to Annex 1 of the consultation NPPF, which states that development plan policies that are in any respect inconsistent with the national decision-making policies contained within the NPPF should be afforded very limited weight, except where they have been examined and adopted against the revised NPPF. Taken together, our Client believes that the Council should ensure the draft wording of Policy SD 1 reflects the December 2024 NPPF, while having a policy mechanism that is robust in light of emerging national policy.	The new NPPF is likely to change the presumption in favour if sustainable development.	This plan review will be asessed on the content of the current NPPF.	No	
LPR097b	Sustainable Development	Irene Ord	Resident		Policy		SD1 - Presumption in Favour of Sustainable Development (strategic)		Support	NPPF Guidance & Civil/Heritage Law DBC's Enforcement Procedure should enforce all significant planning conditions put in place to protect the town's historic assets. The formal Complaints Procedure may be followed but eventually Enforcement Officers and impacted parties may give up. Impacted historic home owners are being advised to use their own private means to enforce Civil Law when sold off former public land to developers becomes effectively private land that is now being held by Limited Companies with named Directors/Investors (who may change at will). Historic England may only intervene in Grade II* or Grade I cases where harming takes place. If DBC is not prepared to defend its own historic assets who will?	Comment on council's enforcemnt process.	This is a seperat process in planning not relevant to the Local Plan.	No	
LPR095h	Sustainable Development	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Policy		SD1 - Presumption in Favour of Sustainable Development (strategic)		Support	Draft Policy SD1 retains largely the same wording as the previously adopted DLP, with added clarification that particular regard should be had for directing development to sustainable locations and promoting the effective use of land. It is considered to be in accordance with the NPPF, and we welcome the inclusion that the effective land use will be promoted, and policies around housing allocations and the spatial strategy must be reflective of this.	General support for approach.	Support noted.	No	
LPR113 & 114a	Sustainable Development	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		SD1 – Presumption in Favour of Sustainable Development (strategic)		Support	Bellway welcomes the amendments to Policy SD1, aligning with the revised wording of the NPPF update December 2024. The amended policy now appropriately reflects the revised test for refusing planning permission, requiring a "strong" reason for refusal rather than the previous reference to a "clear" reason.	General support for approach.	Support noted.	No	

LPR104d	Sustainable Development	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621219	Policy		Policy SD1: Presumption in favour of sustainable development		Object	4.1 Taylor Wimpey considers that the wording in Policy SD1 does not provide any further development on the policy wording in the Framework and that simply replicating the wording of the Framework does not add anything to the plan and therefore should not be included within the Plan. Justification 4.2 The policy replicates the wording of the Presumption in Favour of Sustainable Development contained in paragraph 11 of the Framework, with the wording being updated to reflect the current December 2024 Framework. 4.3 By simply replicating the wording of the Framework it does not add anything to the Plan. Paragraph 16d of the Framework actively instructs local planning authorities to avoid duplication of policies contained in the Framework itself. 4.4 Furthermore, although transitional arrangements may allow the Local Plan Review to be examined against the December 2024 Framework, planning decisions taken after adoption will be required to apply the Framework in force at that point. With a further revision to the Framework anticipated later this year, and likely to fundamentally alter the presumption in favour of sustainable development (as set out in the recent consultation draft), Policy SD1 risks being superseded at the point of adoption. This further reinforces the view that the policy is superfluous and would serve no meaningful purpose. Proposed Approach 4.5 To address the comments, the following approach is proposed: • Removal of the policy wording to avoid duplication of the Framework	Duplication of wording in the NPPF is uneccessary and over complicates the plan. The new NPPF is likely to change the presumption in favour if sustainable development.	We agree in principle that duplication should be avoided however in terms of clarity to the reader we think it makes sense to retain this fundamental principle within the plan. This plan review will be asessed on the content of the current NPPF.	No	
LPR105d	Sustainable Development	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621221	Policy		SD1- Presumption in favour of sustainable development		Neutral	Taylor Wimpey considers that the wording in Policy SD1 does not provide any further development on the policy wording in the Framework and that simply replicating the wording of the Framework does not add anything to the plan and therefore should not be included within the Plan. The policy replicates the wording of the Presumption in Favour of Sustainable Development contained in paragraph 11 of the Framework, with the wording being updated to reflect the current December 2024 Framework. 4.3 By simply replicating the wording of the Framework it does not add anything to the Plan. Paragraph 16d of the Framework actively instructs local planning authorities to avoid duplication of policies contained in the Framework itself. 4.4 Furthermore, although transitional arrangements may allow the Local Plan Review to be examined against the December 2024 Framework, planning decisions taken after adoption will be required to apply the Framework in force at that point. With a further revision to the Framework anticipated later this year, and likely to fundamentally alter the presumption in favour of sustainable development (as set out in the recent consultation draft), Policy SD1 risks being superseded at the point of adoption. This further reinforces the view that the policy is superfluous and would serve no meaningful purpose. To address the comments, the following approach is proposed: Removal of the policy wording to avoid duplication of the Framework	Duplication of wording in the NPPF is uneccessary and over complicates the plan. The new NPPF is likely to change the presumption in favour if sustainable development.	We agree in principle that duplication should be avoided however in terms of clarity to the reader we think it makes sense to retain this fundamental principle within the plan. This plan review will be asessed on the content of the current NPPF.	No	
LPR051	Sustainable Development	Chris Martin	HBF		Policy		SD1 - Presumption in Favour of Sustainable Development (strategic)		Neutral	It is noted that this policy simply replicates the wording of the Presumption in Favour of Sustain-able Development contained in paragraph 11 of the NPPF, with the wording being updated to reflect the current December 2024 NPPF. 13. The HBF considers that simply replicating the wording of the NPPF does not add anything to the plan, and indeed paragraph 16d of the NPPF actively instructs local planning authorities to avoid duplication of policies contained in the NPPF itself. 14. The Council will also be aware that whilst the Local Plan Review may benefit from transitional arrangements so that it will be examined against the December 2024 NPPF, in reality any plan-ning decisions that will be made after the plan is adopted will need to take into account the NPPF which is in place at the time. Given that it is expected that a new NPPF will be published later this year which is likely to fundamentally change the Presumption in Favour of Sustainable De-velopment (as outlined in the recent consultation draft), then it is likely to be the case that Policy SD1 would be rendered out of date upon adoption anyway (see paragraphs 4-6 of this letter). This further reinforces the view that the Council should delete Policy SD1 as it is superfluous and is likely to be ineffective at the point of the plan's adoption.	Duplication of wording in the NPPF is uneccessary and over complicates the plan. The new NPPF is likely to change the presumption in favour if sustainable development.	We agree in principle that duplication should be avoided however in terms of clarity to the reader we think it makes sense to retain this fundamental principle within the plan. This plan review will be asessed on the content of the current NPPF.	No	
LPR032i	Sustainable Development	Richard Cowen	CPRE Durham		Policy		SD2 – Settlement Hierarchy (strategic)		Support	"CPRE Durham accepts development within the main urban area of Darlington. Although we have been critical of the amount of housing proposed here, which we have considered to be excessive, we accept that the principle has been approved following the Examination into the current Local Plan. That said, we have also considered the development that has been permitted in villages such as Middleton St George (and neighbouring development adjoining the village but in fact in Neasham Parish) which has affected the character of such villages. we therefore fully support the proposed wording of this Policy to say that future development in such areas should support local needs. We will comment further on Policy H1 as we fear this may not be fully consistent with this Policy."	Supportive of settlement heirachy to protect rural villages and countryside.	Support noted.	No	
LPR113 & 114b	Sustainable Development	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		SD2 – Settlement Hierarchy (strategic)		Neutral	Bellway are broadly supportive of the Settlement Hierarchy remaining as is secured in the adopted local plan within the Draft Plan. The decision to direct the broad distribution of development in the first instance to the Darlington Urban Area is the most sustainable and viable option for the Borough given the relative lack of significant settlements, and this is welcomed. 3.6.2 DBC should consider that maintaining this hierarchy necessitates that they incorporate a level of flexibility within the Draft Plan. A rigid application of the hierarchy risks constraining the delivery of sustainable development, particularly where site availability and viability issues limit opportunities for new development to come forward within the Darlington Urban Area.	Generally supportive of heirachy but recommends a level of flexibility.	The plan as drafted is flexible and sets out in other policies where development outside of the settlement heirachy may be permitted.	No	
LPR067 & 68	Sustainable Development	Georgina Cox	Gladman		Policy		SD2 – Settlement Hierarchy (strategic)		Neutral	See submitted attachment. Darlington Borough Council is not intending to make any changes to the settlement hierarchy that is contained in the current adopted Local Plan. Gladman supports the placement of settlements in the hierarchy, recognizing Middleton St George's and its level of sustainability as a tier 2 settlement in the adopted and draft Local Plan. We would still consider the plan needs to thoroughly examine whether the housing need can be met through the distribution set out in the settlement hierarchy. Darlington is increasingly becoming constrained and running out of opportunities for growth, Gladman would emphasise the increasing need for the council to meet its housing need through lower tier settlements which have the available land needed and established infrastructure to facilitate further grow.	Generally supportive but consideration will need to be given to opportunities for growth in 'lower tier' settlements.	General support noted. At present we are confident housing needs can be met within existing allocations in and around the main urban area and service villages.	No	

LPR041g	Sustainable Development	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy		SD2 – Settlement Hierarchy (strategic)		Object	"Support the policy to the extent that Neasham is classified as a Rural Village. It follows that the defined Rural Villages are acknowledged to be a more sustainable location for development than smaller, non-classified villages, hamlets and groups of dwellings which having regard to the policy are to be regarded as 'countryside'. It is noted that in criterion 3, the policy states that development in the Rural Villages will make efficient and sustainable use of existing buildings and infill opportunities. It is anticipated that there will be limited potential to make more use of existing buildings in the Rural Villages. In relation to infill development, in the Glossary to the Plan, 'infill development' is defined as 'the development of a small area of vacant land between existing buildings'. It is anticipated acknowledging this definition that there will be limited opportunities for such development in the Rural Villages. This is in practice a perpetuation of a long existing policy approach which is unnecessarily restrictive of development in the Rural Villages acknowledging amongst other things the need stated in reasoned justification paragraph 3.0.11 to safeguard and maintain their vitality and viability. It is acknowledged that a balance is needed however at this stage it is considered that the proposed approach is a further perpetuation of the existing longstanding approach and is too restrictive. A representation is submitted to the Glossary definition of infill, namely that the definition should include the 'filling of gaps and rounding off'. There are locations where an additional dwelling or two could be be added to existing development in the Rural Villages and would integrate acceptably. Indeed part of the character of these Villages arises from small numbers of houses being added over the years. Following on from the above, criterion 3 states that on the edges of Rural Villages, housing development will meet clearly identified local needs recognising that an element of open market housing may be required to deliver essential affordable	The current policy approach is considered overly restrictive on rural villages and greater flexibility should be afforded for infill development in these areas.	Consideration is given to the broadening of the definition of 'infill' developemnt in the Glossary section.	No	
LPR064 & 065a	Sustainable Development	Nick Pleasant	Stantec on behalf of Vistry		Policy		SD2 - Settlement Hierarchy (strategic)		Neutral	Vistry is broadly supportive of the Settlement Hierarchy remaining as is secured in the adopted local plan within the Draft Plan, which identifies a range of settlements. The hierarchy rightly notes that different settlements in the borough play a different role. DBC should consider a level of flexibility within the Draft Plan. A rigid application of the hierarchy risks constraining the delivery of sustainable development, particularly where site availability and viability issues limit opportunities for new development to come forward. Of greater to concern to Vistry is the lack of housing growth which is directed to the settlements and villages outside of the main urban area or the proposed urban expansions. Whilst the hierarchy recognises the role of these settlements there is little to no growth proposed through proactive allocation of sites. This presents two immediate challenges: 1. Settlements without allocations stagnate, and lack the natural churn of development which is necessary to retain vibrancy and growth. 2. Future housing growth occurs on a piecemeal basis with no long term plan for how new development can be managed to successfully contribute to local infrastructure. Both outcomes can be avoided with a proactive approach to delivering development in settlements outside the main urban area.The issue is exacerbated by overly stringent Development Limits policies (e.g., SD3) which would seemingly take a presumptive position against logical development adjacent to these settlements where there is no scope for growth within the settlement boundary (Development Limits). Therefore, the plan should follow the spatial strategy and allocate land outside the urban areas. Indeed, as set out in our comments against policy H1 there is a need to identify additional land through the local plan in any case. As such, new sites should be allocated to increase the housing supply, and in addition further sites should be allocated to address the genuine likelihood that larger sites in the plan do not deliver as expected. See submitted attachment.	Broadly supportive of Settlement Heirachy but consider that more housing growth in the surrounding villages should be considered.	In recent years the surrounding villages of Darlington have had significant areas of growth. Including numerous commitments and completions within the existing local plan. Some of this was to ensure sufficient delivery while larger scale urban extensions were planned.	No	
LPR051a	Sustainable Development	Chris Martin	HBF		Policy		SD2 - Settlement Hierarchy		Neutral	The HBF notes that the Council is not intending to make any changes to the Borough's Settlement Hierarchy that is contained in the existing Local Plan. Whilst we do not have any specific comments on individual settlements, the HBF considers that the Council should be re-examining the adopted Settlement Hierarchy to establish if it is still appropriate for the new plan period. This needs to focus on whether the plan can still sustainably meet its housing need within the right locations in the Borough.	The settlement heirachy should be re-examined to establish this is still appropriate for the new plan period.	This has been considered and will be presented in the sustainability appraisal.	No	
LPR092c	Sustainable Development	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		SD2 – Settlement Hierarchy (strategic)		Object	Miller Homes acknowledge that the Darlington Urban Area will likely remain the focus for development in the Borough. However, Miller Homes consider that the position of Middleton St George in the settlement hierarchy should be higher than the other service villages reflecting its role as more than a service village. The population of Middleton St George is approximately 5,000 according to ONS data which is nearly twice as large as Hurworth (2,780) and substantially larger than Heighington (7,000). In addition, it has significantly more services including: • Three convenience stores (Sainsburys, Londis and Premier) • Post Office • Vets • Doctors surgery • Dentist • Three pubs • Cricket club • Community centre • WI hut and scouts hall • Restaurants and takeaways • Two cafes • Pet shop and dog groomers • Betting shop • Barbers • Primary school • Nursery • Train station • Bus services Middleton St George is the largest settlement in the Borough after Darlington and offers a substantial range of services and sustainable transport links including a train station with regular services to both Darlington and Middlesbrough as set out above.	Miller Homes consider that Middleton St George should be ranked higher than the other service villages due to it's range of services.	We do not consider an additional tier is necessary at this time.	No	

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LPR104e	Sustainable Development	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621220	Policy		Policy SD2: The Settlement Hierarchy		Unknown	5.1 Taylor Wimpey considers that the settlement hierarchy should be capable of delivering the much needed housing and economic growth and should reflect the role and function of the settlement. This should be based on robust and up to date evidence base that supports the policy. Justification 5.2 The Council suggests within the consultation document that the settlement hierarchy will comprise of three categories: • The Darlington Urban Area; • Service Villages (Heighington, Hurworth and Middleton St George) • Rural Villages (Bishopton, Brafferton, High Coniscliffe, Low Coniscliffe, Merrybent, Neasham, Piercebridge, Sadberge) 5.3 This hierarchy has been carried forward from the adopted Local Plan; however, it is not underpinned by an updated assessment of settlement role and function or updated assessment of housing and employment needs. As a result, there is concern that the proposed hierarchy is not supported by a proportionate and up-to-date evidence base, contrary to the requirements of the Framework 5.4 The location of development is a critical aspect of achieving sustainable development. In accordance with national policy, development should be directed to locations that are, or can be made, sustainable, with regard to accessibility, the availability of services and facilities, and the ability to support both existing and new communities. 5.5 Given the scale of housing and employment growth required to meet identified needs, a more flexible and responsive approach to the settlement hierarchy is necessary. This should enable growth to be distributed across a range of settlements and site scales, informed by their functional role and, in the case of employment development, by the strategic suitability and accessibility of locations. 5.6 Berrymead Farm, for example, represents a sustainable settlement to the north of Darlington, with strong functional relationships to the urban area and access to	The heirachy needs to be underpinned by updated evidence to demostrate it remains sufficient. A more flexible approach may be needed to sustain growth.	Further evidence will be presented and reasonable alternatives considered in the sustainabiltiy appraisal of the plan.	No	
LPR105e	Sustainable Development	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621222	Policy		SD2 - Settlement Hierarchy		Neutral	Taylor Wimpey considers that the settlement hierarchy should be capable of delivering the much needed housing and economic growth and should reflect the role and function of the settlement. This should be based on robust and up to date evidence base that supports the policy. The Council suggests within the consultation document that the settlement hierarchy will comprise of three categories: • The Darlington Urban Area; • Service Villages (Heighington, Hurworth and Middleton St George) • Rural Villages (Bishopton, Brafferton, High Coniscliffe, Low Coniscliffe, Merrybent, Neasham, Piercebridge, Sadberge) 5.3 This hierarchy has been carried forward from the adopted Local Plan; however, it is not underpinned by an updated assessment of settlement role and function or updated assessment of housing and employment needs. As a result, there is concern that the proposed hierarchy is not supported by a proportionate and up-to-date evidence base, contrary to the requirements of the Framework 5.4 The location of development is a critical aspect of achieving sustainable development. In accordance with national policy, development should be directed to locations that are, or can be made, sustainable, with regard to accessibility, the availability of services and facilities, and the ability to support both existing and new communities. 5.5 Given the scale of housing and employment growth required to meet identified needs, a more flexible and responsive approach to the settlement hierarchy is necessary. This should enable growth to be distributed across a range of settlements and site scales, informed by their functional role and, in the case of employment development, by the strategic suitability and accessibility of locations, Low Coniscliffe, for example, represents a sustainable settlement to the west of Darlington, with strong functional relationships to the urban area and access to associated services and facilities. Taylor Wimpey's site at Coniscliffe Road is available, suitable and achievable, and is capable of contributing positively to the	The heirachy needs to be underpinned by updated evidence to demostrate it remains sufficient. A more flexible approach may be needed to sustain growth.	Further evidence will be presented and reasonable alternatives considered in the sustainabiltiy appraisal of the plan.	No	
LPR103d	Sustainable Development	Duncan Peake	Raby Estates	Hanna Mawson, Pegasus Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne, NE1 6AE	Policy		SD2 - Settlement Hierarchy		Unknown	As illustrated in the Boundary Extent Plan, the Client's landholdings in Piercebridge are directly adjacent to the village centre and the defined Development Limits, as shown on the Draft Policies Map (as well as the adopted Policies Map). As such, these landholdings are considered 'countryside', noting that these land parcels could deliver residential development where this would meet clearly identified local needs and the set of criteria, as per Policy SD 2, Policy H6 and Policy H7. It is considered evident that Policies SD 2, H6 and H7 in the Draft Local Plan are inherently restrictive with regards to enabling residential development opportunities and growth across the Borough's countryside, particularly given the emphasis placed on delivering affordable units on the edge of Rural Village, with a small proportion of market housing 'in exceptional circumstances' (Policies SD 2 and H6), and the limited residential development types that could be permitted in the countryside (Policy H7).	Concerns raised in respect of policy SD2 (Settlement Hierarchy), policy H6 (Rural Exception Sites) and Policy H7 (Residential Development in the Countryside) in meeting the soundness tests as per para 36 of the NPPF. It is considered that these Policies are overly restrictive to development in rural areas and do not recognise housing needs of rural communities. The policies as drafted risk preventing opportunities for sustainable housing growth outside of the Darlington Urban Area. Further, whilst Piercebridge for example is identified as a Rural Village, development opportunities on land adjacent to the settlement and other rural villages are heavily constrained by these Policies due to the emphasis on delivering affordable units and the limited residential development types. Sympathetic development would support the sustainability of these communities and accordingly a more positive approach to development in rural areas should be considered. Recommended that a policy similar to policy 6 of the County Durham Plan is included in the emerging Darlington Local Plan which covers development of sites which are not allocated within and outside built up areas.	Policies SD2, H6 and H7, outline the locational strategy for new development in the borough and restrict development beyond development limits. The approach was found sound for the current Local Plan and therefore has been carried forward into the reviewed draft. No changes are therefore considered necessary.	No	

LPR103a	Sustainable Development	Duncan Peake	Raby Estates	Hanna Mawson, Pegasus Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne, NE1 6AE	Policy		SD2 - Settlement Hierarchy		Unknown	The Draft Local Plan establishes the Settlement Hierarchy under Policy SD 2. The broad distribution of development in the Local Plan area is outlined within the three distinct tiers of the Settlement Hierarchy. The tiers of the Hierarchy include the 'Darlington Urban Area', whereby this area remains the focus of future development within the Borough, followed by 'Service Villages', and lastly 'Rural Villages'. It is to be noted that the policy wording for the Settlement Hierarchy in Policy SD 2 remains identical to the wording within Policy SH 1 (Settlement Hierarchy) of the adopted Local Plan. As detailed above, the Client's landholdings are directly adjacent to the village of Piercebridge, which is established as a Rural Village in the Hierarchy. Rural Villages are defined in Policy SD 2 as follows: 'The character of the Rural Villages, including their relationship to and setting within the surrounding countryside, will be protected and where possible enhanced. Development in these villages will make efficient and sustainable use of existing buildings and infill opportunities. On the edges of Rural Villages, housing development will meet clearly identified local needs, recognising that an element of open market housing may be required to deliver essential affordable units.' Policy SD 2 then states that: 'Only those places with defined Development Limits are classified as settlements for the purposes of this Policy. All areas outside the Development Limits are to be regarded as 'countryside' unless specifically identified for other uses in the plan (including Policies E 1 and E 2). The Development Limits are defined on the Policies Map.' Development Limits are established in Policy SD 3 (Development Limits) of the Draft Local Plan, which outlines: 'Development within the limits identified on the Policies Map will be acceptable in	Provides a summary of the policy position with reguard to a clients site adjacent to a rural settlement.	No comment	No	
LPR067 & 68j	Sustainable Development	Georgina Cox	Gladman		Policy		SD2 – Settlement Hierarchy (strategic)		Neutral	See submitted attachment. Darlington Borough Council is not intending to make any changes to the settlement hierarchy that is contained in the current adopted Local Plan. Gladman supports the placement of settlements in the hierarchy, recognizing Middleton St George's and its level of sustainability as a tier 2 settlement in the adopted and draft Local Plan. We would still consider the plan needs to thoroughly examine whether the housing need can be met through the distribution set out in the settlement hierarchy. Darlington is increasingly becoming constrained and running out of opportunities for growth, Gladman would emphasise the increasing need for the council to meet its housing need through lower tier settlements which have the available land needed and established infrastructure to facilitate further grow.	Broadly supportive of settlement heirachy but urges a flexible approach in order to meet growth needs. This included the consideration of 'lower tier' settlements.	General support noted. At present we are confident housing needs can be met within existing allocations in and around the main urban area and service villages.	No	
LPR067 & 68k	Sustainable Development	Georgina Cox	Gladman		Policy		SD3 – Development Limits (strategic)		Neutral	See submitted attachment. Gladman would suggest the council differentiates the term on land beyond development limits as there is a difference to land next to settlement boundaries which may be appropriate for development, and potential sustainable development in rural areas which may support the economy but be more isolated in nature.	Some differention should be provided between land beyond development limits and land next to settlement boundaries.	The existing approach is considered sufficient.	No	
LPR085b	Sustainable Development	Matthew Hewitt	Hamilton Willis		Policy		SD3: Settlement Boundaries		Neutral	Policy SD3: Settlement Boundaries – what evidence informed the approach to this updated policy? For example, what justification exists for allocating new development on the west side of the A1(M).	Further evidence is required to demonstrate justification for development ro the west of the A1(M).	Further evidence will be presented and reasonable alternatives considered in the sustainabiltiy appraisal of the plan.	No	
LPR067 & 68a	Sustainable Development	Georgina Cox	Gladman		Policy		SD3 – Development Limits (strategic)		Neutral	See submitted attachment. Gladman would suggest the council differentiates the term on land beyond development limits as there is a difference to land next to settlement boundaries which may be appropriate for development, and potential sustainable development in rural areas which may support the economy but be more isolated in nature.	Some differention should be provided between land beyond development limints and land next to settlement boundaries.	The existing approach is considered sufficient.	No	
LPR087y	Sustainable Development	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy SD3 - Development Limits (strategic policy)		Support	It is acknowledged that draft Policy SD 3 duplicates adopted Policy H 3. This states that development within the limits identified on the Policies Map will be acceptable in principle, subject to compliance with other relevant national and local policies. Our Client broadly agrees with the content of Policy SD 3 as currently drafted; however, they wish to make clear that they reserve the right to provide further comment on draft Policy SD 3 should the Council consider any amendments to be necessary at later stages of consultation.	General support for the approach but may revisit later in the process.	Noted.	No	
LPR092d	Sustainable Development	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		SD3 – Development Limits (strategic)		Object	The Council do not appear to have undertaken an assessment of the existing development limits to inform the Local Plan review. As such, there is no supporting evidence to justify why the development limits are set as they are particularly given the changes to the housing requirement and jobs target. Miller Homes support the Home Builders Federation's (HBF) position on development limits as set out in their representations, in that, there is a significant difference between land adjacent to settlements and settlement boundaries that may be sustainable and suitable for appropriate development and sites which are in isolated rural locations (which are sought to be protected by Policy H7).	The Council do not appear to have undertaken an assessment of the existing development limits to inform the Local Plan review.	This has been undertaken and will be published alongside the Reg 19 consultation.	No	
LPR104f	Sustainable Development	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621221	Policy		Policy SD3: Development Limits		Unknown	6.1 Taylor Wimpey considers that the proposed policy wording in Policy SD3 is overly restrictive and does not provide the appropriate flexibility to ensure that housing and employment needs can be met. Justification 6.2 The proposed development limits are defined on the consultation policies map and are drawn tightly to the existing urban extent, with the exception of sites already allocated in the adopted Local Plan. This approach significantly restricts development opportunities outside these boundaries and limits flexibility in the supply of housing. 6.3 Given that the Local Plan Review has not undertaken a comprehensive reassessment of housing and employment needs beyond the standard method for housing, it is concerning that such tightly drawn development boundaries are proposed at this stage. The approach risks unnecessarily constraining the delivery of identified development needs and is not consistent with the Framework's requirement to ensure plans are sufficiently flexible to respond to changing circumstances over the plan period. 6.4 Should any of the existing allocations experience delays or delivery constraints, the policy offers limited scope for alternative sites to come forward, particularly those located at the edges of settlements. National policy supports the identification of a range and choice of sites, and there should therefore be consideration of a hierarchy of potential locations, including sustainable sites adjacent to defined settlements. 6.5 Taylor Wimpey's site at Berrymead Farm represents one such opportunity. Located at the edge of the existing Darlington urban area, the site is well related to the urban boundary and provides a logical extension to the existing urban area. The site is capable of making a positive contribution to housing supply and supporting the vitality and sustainability of Darlington. Proposed Approach 6.6 To address the comments, the following approach is proposed:	Development limits are considered overly restrictive.	The existing approach is considered sufficient.	No	

LPR105f	Sustainable Development	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621223	Policy		SD3 - Development Limits		Object	Taylor Wimpey considers that the proposed policy wording in Policy SD3 is overly restrictive and does not provide the appropriate flexibility to ensure that housing and employment needs can be met. The proposed development limits are defined on the consultation policies map and are drawn tightly to the existing urban extent, with the exception of sites already allocated in the adopted Local Plan. This approach significantly restricts development opportunities outside these boundaries and limits flexibility in the supply of housing. 6.3 Given that the Local Plan Review has not undertaken a comprehensive reassessment of housing and employment needs beyond the standard method for housing, it is concerning that such tightly drawn development boundaries are proposed at this stage. The approach risks unnecessarily constraining the delivery of identified development needs and is not consistent with the Framework's requirement to ensure plans are sufficiently flexible to respond to changing circumstances over the plan period. 6.4 Should any of the existing allocations experience delays or delivery constraints, the policy offers limited scope for alternative sites to come forward, particularly those located at the edges of settlements. National policy supports the identification of a range and choice of sites, and there should therefore be consideration of a hierarchy of potential locations, including sustainable sites adjacent to defined settlements. 6.5 Taylor Wimpey's site at Low Coniscliffe represents one such opportunity. Located at the edge of the existing settlement, the site is well related to the village boundary and provides a logical rounding-off of development between the A1(M) and the village. The site is capable of making a positive contribution to housing supply and supporting the vitality and sustainability of the settlement. To address the comments, the following approach is proposed: • Reflect national policy and guidance. • Undertake a reassessment of the development limit boundaries accounting for	Development limits are considered overly restrictive.	The existing approach is considered sufficient.	No		
LPR113 & 114c	Sustainable Development	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		SD3 – Development Limits (strategic)		Neutral	Bellway acknowledge that this policy is in essence a repurposing of the previous Policy H3 with regards to implementing development limits within the Draft Plan via the Policies Map. Bellway note the provision in Policy H1 that where there is no longer a demonstrable supply of sites to meet the five year housing land requirement, housing sites located beyond development limits that would make a positive contribution to the five-year housing land supply and are well related to the built form of the main urban area or service villages will be support. As Development Plans are meant to be read as a whole, Bellway are satisfied these builds in appropriate flexibility to the hierarchy. The ongoing identification of new suitable residential sites will remain necessary even after the Local Plan is adopted and flexibility within Policy SD3 will prevent the Plan from constraining DBC's ability to respond to emerging needs and opportunities.	General support for approach to development limits and the fallback position should sufficient supply not be forthcoming.	Comment noted.	No		
LPR127, 128 & 129d	Sustainable Development	Ros Kain	Historic England		Policy		SD3 - Development Limits		Neutral	We note the development limits have been drawn to include areas identified for future planned growth of housing and employment adjoining the urban area. The amendments of the settlement limits are not easily identified in the Local Plan Review. The text refers to an exercise being undertaken for the Borough's villages. Some of these are allocated Conservation Areas. Where is this within the Evidence Base. Only one village allocation is proposed. This is an existing allocation in Heighington. It is not clear why and where the village boundaries have been altered if this is not related to proposed allocations. Suggested change - Expand upon which village boundaries have been altered.	Further clarity is needed on the review of the development limits undertaken.	A review has been undertken and documented. This will be published in due course. The recommended updates to development limits are however minimal.	No		
LPR041	Sustainable Development	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy		SD3 – Development Limits (strategic)		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. It is suggested that Development Limits should not be used in this Plan. This would be consistent with the approach in local plans in neighbouring authorities, Durham County for example.	Objection to use of development limits.	This is a tried and tested policy tool tested and found sound at our last examination.	No.		
LPR051b	Sustainable Development	Chris Martin	HBF		Policy		SD3 - Development Limits		Neutral	This policy states that development will generally be acceptable within development limits. However, beyond these limits development will be restricted (this is detailed in Policy H7). 17. The HBF recommends that the Council differentiates in terms of its land beyond development limits, for example there is a significant difference between land adjacent to settlements and settlement boundaries which may be sustainable and appropriate for development; or sustainable development in rural areas where it will enhance or maintain the vitality of rural communities; and sites which are located in isolated areas.	Development limits are considered overly restrictive.	The existing approach is considered sufficient.	No		
LPR064 & 65b	Sustainable Development	Nick Pleasant	Stantec on behalf of Vistry		Policy		SD3 – Development Limits (strategic)		Support	Vistry acknowledges that this policy is in essence a repurposing of the previous Policy H3 with regards to implementing development limits within the Draft Plan via the Policies Map. Vistry notes the provision in Policy H1 that where there is no longer a demonstrable supply of sites to meet the five-year housing land requirement, housing sites located beyond development limits that would make a positive contribution to the five-year housing land supply and are well related to the built form of the main urban area or service villages will be supported. As Development Plans are meant to be read as a whole, Vistry is satisfied these builds in appropriate flexibility to the hierarchy. The ongoing identification of new suitable residential sites will remain necessary even after the Local Plan is adopted and flexibility within Policy SD3 will prevent the Plan from constraining DBC's ability to respond to emerging needs and opportunities. See submitted attachment.	General support for approach to development limits and the fallback position should sufficient supply not be forthcoming.	Comment noted.	No		
LPR041c	Housing	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy			SD3 – 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. It is suggested that Development Limits should not be used in this Plan. This would be consistent with the approach in local plans in neighbouring authorities, Durham County for example.	Development limits are considered overly restrictive.	The existing approach is considered sufficient.	No		
LPR059 & 60	Housing	Dominic Crowley	Lichfields		Policy			SD3 – Development Limits (strategic)	Object	Policy SD3 notes that development within the limits identified on the Policies Map will be acceptable in principle subject to compliance with other relevant national and local policies. The supporting text at paragraph 3.1.2 goes on to note that the limits, defined through Policy SD3 will provide more certainty as to where development will or will not generally be permitted, with Policy H7 clarifying that development in such areas will be restricted. The approach set out within this policy is too restrictive and not consistent with national planning policy which supports development in sustainable locations. If development limits are to be included within the revised Local Plan, the policy should be worded to reflect the opportunities that some edge of settlement sites (such as Hallam Land's site west of Roundhill Road in Hurworth – SHLAA Site Ref: 449) hold for suitable, sustainable and deliverable developments.	Development limits are considered overly restrictive.	The existing approach is considered sufficient.	No		

LPR133	Sustainable Development	Katherine Dobson,	NWL		Section			Sustainable Development	Neutral	We support sustainable planned development in locations well served by our wastewater and water networks and treatment centres. We seek to ensure that proposed development does not encroach or impact on our assets and operational areas. With regards to wastewater services, the vast majority of Darlington borough is served by our Stressholme Sewage Treatment Works, with the exception of Middleton St George and one or two very small rural villages which have their own small Sewage Treatment Works. We have supplied Darlington Council with sewage treatment works capacity mapping which also demonstrates the boundary extent (by colour delineation) of our existing drainage network areas. Where major strategic developments are planned such as the garden villages we will work with the Local Planning Authority and developers to consider our network capabilities and extend our boundary areas if required. With regards to water supply, Darlington borough is served by the Kielder Water Resource Zone (Southern Zone) comprising of the River Tees and Teesdale resources and two Water Treatment Works which supply Teesside. We will supply information on any planned investments in the Darlington area as part of our response to Infrastructure Delivery Plan.	No significant issues raised at this stage. Pointers to further information have been provided.	Information is noted and we will continue the dialogue between the Council and NWL .	No	

LPR reference (starting at LPR021)	Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Site Details	Policy Details	Section Details	Object /Support/ Neutral	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LPR 026 /027b	Sustainable Design and Climate Change	David Barton	Community Campaigner, Civic Heritage, InYouArea Ambassador for Southport		Section	1	DC1 - Sustainable Design Principles	4. Sustainable Design and Climate Change	Neutral	See Section one of PDF response regarding design codes.	A range of suggestions are made particular in relation to historic buildings.	Comment noted	No	None
LPR051c	Sustainable Design and Climate Change	Chris Martin	HBF		Policy	1	DC1 - Sustainable Design Principles		Neutral	The HBF recognises the importance of promoting high quality places and considers good design an important component of what makes a development sustainable. It is noted that Policy DC1 has been amended with inter alia the following wording added: "All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated." Whilst the HBF considers that assessing development proposals against the Building for a Healthy Life criteria can assist in creating high quality schemes, this can only happen where the process of how such an assessment is undertaken and evaluated is clear. Currently the policy and supporting text is not clear on this process and so as it stands, this requirement creates uncertainty and unnecessary risk for developers. The Council should therefore clearly articulate who will be assessing schemes (for instance an individual officer, several officers or an independent panel), whether developers will be permitted to observe or take part in the process, what takes place after the scheme is assessed (for instance, will the developer be able to amend the scheme to address any comments) and how this fits in with a wider planning assessment of a scheme. In relation to the latter point, the Council is correct that developers should seek to maximise the number of green scores and minimise the number of amber scores. However, the HBF notes that the Building for a Healthy Life document itself highlights that there may be circumstances where amber scores cannot be avoided, and that a development only needs nine green scores in order to achieve a commendation and to use the Building for a Healthy Life logo. This needs to be acknowledged by the Council and cross referenced in the policy or supporting text.	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR052b	Sustainable Design and Climate Change	Louise Tait	Environment Agency		Policy	1	DC1 - Sustainable Design Principles		Neutral	Policy DC 1 Sustainable Design Principles We suggest the addition of the following text to criterion c) to address any impacts to watercourses: 'Development likely to affect a watercourse should seek to conserve and enhance the ecological, landscape and recreational value of the watercourse and its associated corridor.'	Suggest additional wording for proposals likely to affect a watercourse	Comment noted and amendment proposed.	Yes	Wording amended to state 'retaining and enhancing the ecological, landscape and recreational value of existing features of interest such as watercourses'.
LPR059 & 60a	Sustainable Design and Climate Change	Dominic Crowley	Lichfields		Policy	1	DC1 – Sustainable Design Principles (strategic)		Object	Whilst the proposed amendments to Policy DC1 are generally welcomed by Hallam Land, concerns are raised with the introduction of the following text: "All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated." Hallam Land acknowledge that assessment against Building for a Healthy Life criteria can be a helpful tool in delivering high-quality residential development, however the current wording raises concerns, particularly given the policy presumption in favour of refusal of planning permission where one or more red is scored as: • The procedure for undertaking the assessment is entirely unclear; there is no detail provided on how this assessment will be undertaken or who will be responsible for determining the final score. Given the complexity of design considerations and implicit requirement for judgements to be made, it is essential that an appropriate mechanism for assessment is identified; • Clarity should be provided on how proposals will be assessed where information on aspects of the development is not known at the time of the planning application (for example in scenarios where an outline planning application with all matters reserved is submitted). Whilst we acknowledge that in such circumstances, typically an 'amber' is scored against the relevant criteria, the policy should be explicit in noting that this should not weigh against the development proposals and is entirely acceptable in such circumstances, with the opportunity for more detailed assessment to be provided at the relevant detailed submission stage.	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR064 & 065c	Sustainable Design and Climate Change	Nick Pleasant	Stantec on behalf of Vistry		Policy	1	DC1 – Sustainable Design Principles (strategic)		Support	Vistry supports the need to achieve well designed places and supports a clear policy approach on this topic. As a successful and experienced developer across the UK, Vistry recognises the benefits that well thought out design policy can have on both the amenity and safety of residents within developments. However, conversely, design policy which places undeliverable aspirations upon developments can become a barrier to development rendering schemes unfeasible and undeliverable in most extreme cases. The amendments to Policy DC1 to remove requirements for schemes to demonstrate energy efficiency measures and low carbon technologies is the correct approach. The requirement for proposals to demonstrate how they will reduce carbon emissions and improve energy performance is more appropriately addressed through validation requirements than as a policy requirement. In a similar vein, Vistry notes the policy requirement for a Building for a Healthy Life assessment to accompany future major residential development proposals. While Vistry has no objection to this requirement in principle and is already providing this assessment in neighbouring authorities such as County Durham, requirements relating to the submission of information with planning applications are not policy matters. As such, this paragraph should be removed from the policy, with DBC's validation checklist instead updated to reflect this requirement. See submitted attachment.	Support removal of energy efficiency measures and low carbon technologies. BFHL is not a policy matter and should be removed and added to the validation checklist.	Energy efficiency requirements moved to new policy. Requirement to undertake BFHL assessment removed due to lack of resources to adequately implement a thorough assessment process.	Yes	Remove BFHL

LPR067 & 68b	Sustainable Design and Climate Change	Georgina Cox	Gladman		Policy	1	DC1 – Sustainable Design Principles (strategic)		Neutral	Gladman would promote there be some more clarity on the Building for a Healthy Assessment and how it works. This is needed to provide certainty to developers and reduce future risk. This will involve articulating who will do the assessment, and what takes place after the scheme is assessed. It is important to note that the Building for a Healthy Life document recognises that sometimes amber scores will not be able to be avoided, and only nine green scores is needed in order to achieve a commendation and to use the Building for a Healthy Life logo. This needs to be recognised and supported in the Draft Local Plan Review within the policy wording for transparency.	Further clarity required on BFHL process. Policy should acknowledge that in some circumstances amber scores cannot be avoided and only 9 green scores are required to achieve commendation.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR067 & 68l	Sustainable Design and Climate Change	Georgina Cox	Gladman		Policy	1	DC1 – Sustainable Design Principles (strategic)		Neutral	Gladman would promote there be some more clarity on the Building for a Healthy Assessment and how it works. This is needed to provide certainty to developers and reduce future risk. This will involve articulating who will do the assessment, and what takes place after the scheme is assessed. It is important to note that the Building for a Healthy Life document recognises that sometimes amber scores will not be able to be avoided, and only nine green scores is needed in order to achieve a commendation and to use the Building for a Healthy Life logo. This needs to be recognised and supported in the Draft Local Plan Review within the policy wording for transparency.	Further clarity required on BFHL process. Policy should acknowledge that in some circumstances amber scores cannot be avoided and only 9 green scores are required to achieve commendation.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR069b	Sustainable Design and Climate Change	Jude Murray	Resident		Policy	1	DC1 – Sustainable Design Principles (strategic)		Object	Policy DC1 (i) states 'All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated'. This should be re-worded to remove 'unless significant overriding reasons can be demonstrated'. There is no mention of an example of what a significant override would be and what is significant to one, may not be to another. To remove any ambiguity at all this wording should be removed. It should also be removed as it cannot be in the interests of residents to allow schemes with red flags! During the Skerningham Design Code consultation events, in which I took part, we were told that schemes with one or more red flags would be refused. The inclusion of the wording in policy DC1(i) therefore undermines the community input and does nothing to encourage future community involvement.	The wording 'unless significant overriding reasons can be demonstrated' should be removed to avoid ambiguity and avoid undermining community input.	This wording has been removed along with the requirement for all developments to undertake a Building for Healthy Life Assessment. This will avoid any inconsistencies with the Garden Village Design Code SPDs.	Yes	Remove BFHL
LPR071d	Sustainable Design and Climate Change	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy	1	DC1 – Sustainable Design Principles (strategic)		Neutral	The majority of the proposed amends and additions to Policy DC1 are supported. However, the following wording could result in an unnecessary policy burden which could result in otherwise sustainable development not coming forward: "All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated." Every planning application should be considered on its own merits. Whilst our client considers that assessing development proposals against the Building for a Healthy Life criteria can assist in creating high quality schemes, this can only happen where the process of how such an assessment is undertaken and evaluated is clear. Currently the policy and supporting text is not clear on this process and this requirement may result in uncertainty and unnecessary risk for developers. The Council should therefore clearly articulate who will be assessing schemes (for instance an individual officer, several officers or an independent panel), whether developers will be permitted to observe or take part in the process, what takes place after the scheme is assessed (for instance, will the developer be able to amend the scheme to address any comments) and how this fits in with a wider planning assessment of a scheme. While the Council is correct that developers should seek to maximise the number of green scores and minimise the number of amber scores, the Building for a Healthy Life document itself highlights that there may be circumstances where amber scores cannot be avoided (page 9 of https://www.designforhomes.org/wp-content/uploads/2020/11/BFL-2020-Brochure.pdf), and states that developers should not be penalised for not being able to secure a green light. This needs to be	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR074f	Sustainable Design and Climate Change	Leanne Carroll	Resident		Policy	1	DC1 – Sustainable Design Principles (strategic)		Neutral	Policy DC1 i says: "All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated." It's always possible to find significant overriding reasons if you look hard enough. This is very sneaky and I strongly disagree with this. No reds should be allowed.	No reds should be allowed and the wording 'significant overriding reasons' should be removed.	This wording has been removed along with the requirement for all developments to undertake a Building for Healthy Life Assessment. This will avoid any inconsistencies with the Garden Village Design Code SPDs.	Yes	Remove BFHL
LPR077	Sustainable Design and Climate Change	Sarah Harris	Resident		Policy	1	DC1 – Sustainable Design Principles (strategic)		Object	Object to the proposed amendment to Policy DC1(i), which would allow major residential developments to receive planning permission despite receiving a "red" score against the Design Code. This approach is inconsistent with the principles of the Skerningham Design Code. Any development that receives a "red" score should be refused planning permission to ensure adherence to design standards and policy integrity	No reds should be allowed and the wording 'significant overriding reasons' should be removed.	This wording has been removed along with the requirement for all developments to undertake a Building for Healthy Life Assessment. This will avoid any inconsistencies with the Garden Village Design Code SPDs.	Yes	Remove BFHL

LPR081a	Sustainable Design and Climate Change	J Murray	Secretary - Whinfield Residents Association inc Friends of Beech Wood		Policy	1	DC1 – Sustainable Design Principles (strategic)		Neutral	Policy DC1(i) introduces the concept that schemes with one or more reds will be refused planning permission unless significant overriding reasons can be demonstrated. This should be removed and replaced with 'schemes with one or more reds will be refused planning permission'. This is in the best interests of the residents of Darlington. The above should also be extended to the Design Code for Skerningham Garden Village whereby any red flags should mean that planning permission is refused. No reds should be allowed!	No reds should be allowed and the wording 'significant overriding reasons' should be removed.	This wording has been removed along with the requirement for all developments to undertake a Building for Healthy Life Assessment. This will avoid any inconsistencies with the Garden Village Design Code SPDs.	Yes	Remove BFHL
LPR086c	Sustainable Design and Climate Change	Roger Fitzpatrick-Odahamier	Resident		Policy	1	DC1 – Sustainable Design Principles (strategic)		Object	As a resident who took part in the Skerningham Design Code consultation where we were told that schemes with one or more red flags will be refused I strongly object to policy DC1 (i) which now states that red IS allowed. The Design Code was developed with community input and must not be degraded in its implementation. Reds should NOT be allowed in any circumstances. This will therefore protect Darlington from any unsustainable schemes.	No reds should be allowed and the wording 'significant overriding reasons' should be removed.	This wording has been removed along with the requirement for all developments to undertake a Building for Healthy Life Assessment. This will avoid any inconsistencies with the Garden Village Design Code SPDs.	Yes	Remove BFHL
LPR087b	Sustainable Design and Climate Change	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	1	DC1 – Sustainable Design Principles (strategic)		Object	The importance of achieving good design through sustainable design principles is understood by our Client, and as such they do not principally disagree with the general requirements of draft Policy DC 1. That said, the draft Policy has added some inter alia text following criteria a – e requiring: "All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated". Whilst our Client generally supports an approach that has regard to the Building for a Healthy Life criteria, and acknowledges the role that the toolkit plays in delivering high-quality, sustainable residential development, they consider that the wording of draft Policy DC 1 risks being overly prescriptive and rigid. Firstly, having regard to the inter alia wording in its entirety, our Client is concerned that the process for undertaking and evaluating the assessment lacks clarity, with no information provided within the policy or supporting text as to the Council's expectations. Our Client therefore requests that the Council clearly sets out both its standards and expectations for the assessment process, including how the assessment will be received, evaluated and determined in the context of any wider planning application. Further information should also be provided regarding our Client's role in the assessment process following submission, as the draft Policy currently offers no clarity in respect of any subsequent negotiation stages. Our Client further considers that the current wording of draft Policy DC 1 gives rise to an unjustifiably prescriptive and rigid approach. As drafted, the Policy requires all major new residential development to conduct the Building for a Healthy Life assessment. Whilst the Council's intentions are laudable, and our Client recognises the importance of the assessment in appropriate circumstances, the absence of flexibility may result in	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR094b	Sustainable Design and Climate Change	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469238	Policy	1	Policy DC 1 Sustainable Design Principles		Support/Object	Policy DC 1 introduces a requirement to conduct a Building for a Healthy Life Assessment (or successor document), making clear that residential schemes should seek to 'secure as many greens as possible, whilst minimising the number of ambers' and that 'Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated.' In theory, applying the Building for a Healthy Life criteria provides a potentially useful way of assessing the quality of residential schemes. However, the policy and supporting text are ambiguous on a number of key matters, including: •Who is expected to undertake the assessment (presumably the applicant)? •At what stage should this be done (presumably to accompany the submission)? •Who – within the Council – will scrutinise it (will it be a single Officer or multiple Officers from various disciplines)? •Will developers be allowed to engage in the scrutiny process (and how) and make suitable amendments in response? •How will the above align with the wider planning application process? Mandale Homes are not only concerned with the significant ambiguity highlighted above, but also with the rigidity of the Council's approach to scoring, whereby a single 'red' score would result in an automatic refusal unless there were 'significant overriding reasons'. Whilst any scheme should of course seek to achieve as many 'green' scores as possible, it should be noted that obtaining nine green scores out of 12 (with no red scores) would be sufficient to secure a Building for a Healthy Life commendation. Clearly, any scheme should seek to avoid any red scores. Nevertheless, such should not	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL

LPR095b	Sustainable Design and Climate Change	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Policy	1	DC1 - Sustainable Design Principles (strategic)		Neutral	We largely agree with the changes proposed to the adopted wording of Policy DC1 within the DLP; however, the inclusion of a requirement for all new major new residential developments to conduct a Building for a Healthy Life Assessment is not considered justified. Furthermore, the proposed threshold of one or more reds as part of this Assessment, resulting in a refused planning permission unless there is a significant overriding reason, is not considered positively prepared. There is no requirement within the latest revision of the NPPF requiring such an assessment, and it is not a statutory legal requirement, but a recommendation. Generally, the assessment encompasses issues which should be promoted under local planning policy. We would suggest that these issues are, therefore, assessed under the relevant policy rather than a binary test within the Building for a Health Life Assessment which could require the refusal of applications based on the position advocated by Draft Policy DC1 rather than an assessment of the planning balance, Additionally, the proposed wording lacks clarity on the threshold which would result in a refusal, once the decision-making stage is reached. In short, instead of a tool promoting positive development and meeting the area's needs, the tool could potentially be used to hinder and restrict development. Suggested Modification We suggested the removal of the requirement for a Building for a Healthy Life Assessment for all major residential development. It is not justified and the strict criteria does not demonstrate a positive approach to meeting the area's needs. Should the assessment be retained as part of draft Policy DC1, we suggest that the policy be reframed as a recommendation for major residential development proposals so as not to jeopardise sustainable development in accordance with the policies of the draft DLP.	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR104g	Sustainable Design and Climate Change	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621222	Policy	1	Policy DC1: Sustainable Design Principles (Strategic Policy)		Unknown	7.1 Taylor Wimpey understands the overarching objective of embedding sustainable design principles within the Local Plan; however, it is essential that the proposed approach to implementation is proportionate, clearly articulated and consistent with national planning policy to ensure that the Plan is justified and capable of effective delivery. Justification 7.2 The Council's objective of embedding high-quality design to create attractive and successful places where people want to live, work and invest is supported and aligns with the aims of the Framework. However, Taylor Wimpey has concerns regarding the wording and operation of elements of Policy DC1. 7.3 As drafted, the policy requires all major residential development to undertake a Building for a Healthy Life (BHL) assessment and states that proposals achieving one or more red scores will be unacceptable and refused planning permission unless significant overriding reasons are demonstrated. 7.4 While the use of the Building for a Healthy Life Framework can assist in achieving well-designed development, this can only be effective where the process for undertaking, assessing and applying the results of such assessments is clear and proportionate. At present, the policy and supporting text do not provide sufficient clarity as to how assessments will be carried out, who will be responsible for their evaluation, whether developers will be able to engage in the assessment process, how any identified issues would be addressed through scheme amendments, or how the BHL assessment would be weighed within the wider planning balance. As currently expressed, the policy therefore introduces unnecessary uncertainty and risk, contrary to the Framework's requirement for policies to be clear, unambiguous and capable of consistent decision-making. 7.5 It is acknowledged that schemes should seek to maximise green scores and minimise amber scores. However, the Building for a Healthy Life guidance itself	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR105g	Sustainable Design and Climate Change	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621224	Policy	1	DC1 - Sustainable Design Principles (strategic)		Unknown	Taylor Wimpey understands the overarching objective of embedding sustainable design principles within the Local Plan; however, it is essential that the proposed approach to implementation is proportionate, clearly articulated and consistent with national planning policy to ensure that the Plan is justified and capable of effective delivery. The Council's objective of embedding high-quality design to create attractive and successful places where people want to live, work and invest is supported and aligns with the aims of the Framework. However, Taylor Wimpey has concerns regarding the wording and operation of elements of Policy DC1. 7.3 As drafted, the policy requires all major residential development to undertake a Building for a Healthy Life (BHL) assessment and states that proposals achieving one or more red scores will be unacceptable and refused planning permission unless significant overriding reasons are demonstrated. 7.4 While the use of the Building for a Healthy Life Framework can assist in achieving well-designed development, this can only be effective where the process for undertaking, assessing and applying the results of such assessments is clear and proportionate. At present, the policy and supporting text do not provide sufficient clarity as to how assessments will be carried out, who will be responsible for their evaluation, whether developers will be able to engage in the assessment process, how any identified issues would be addressed through scheme amendments, or how the BHL assessment would be weighed within the wider planning balance. As currently expressed, the policy therefore introduces unnecessary uncertainty and risk, contrary to the Framework's requirement for policies to be clear, unambiguous and capable of consistent decision-making.It is acknowledged that schemes should seek to maximise green scores and minimise amber scores. However, the Building for a Healthy Life guidance itself recognises that amber scores may, in certain circumstances, be unavoidable and that a scheme may still achieve a commendation where it secures an appropriate balance of outcomes. This flexibility should be expressly recognised within	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL

LPR107	Sustainable Design and Climate Change	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Policy	1	DC1 - Sustainable Design Principles (strategic)		Neutral	This policy sets out a general framework for good design principles and is supported by Cityheart. With respect to the wording of a(iii) we would suggest a minor modification to the wording of this policy to; iii. That the proposal has taken account of the need to safeguard or enhance important views and vistas, having regard to their significance and the wider benefits of the proposal; and With respect to criterion b, we would encourage greater flexibility in the wording to acknowledge that not all development proposals can be dealt with in a uniform way with respect to the provision of parking due in most part to site constraints. We would therefore suggest the inclusion of the terms 'where appropriate'. It is suggested that the second sentence of criterion b be worded; Parking should be arranged, where appropriate, to avoid streets and spaces becoming visually dominated by vehicles Finally, with respect to a Building for Healthy Life Assessment (or successor document) we would discourage the use of a punitive measure that would see a presumption that any scheme receiving a red will be refused planning permission. We have seen such approaches in other authorities diminish the ability for a balanced judgement to be made. We would suggest the removal of the word 'significant' in this context.	Suggest minor wording changes to a iii and b in relation to views and vistas and parking. Concerns the approach to BFHL is punitive and diminishes ability to arrive at balanced judgement.	A wording amendment is proposed to a iii in relation to important views and vistas as suggested. No changes are porposed to part b with through the use of should is conisidered sufficiently flexible should their be specific exceptional circumstances where this cannot be achieved. BFHL requirements has been deleted.	Yes	Add 'having regard to their significance and the wider benefits of the proposal'to part aiii. Remove BFHL.
LPR111 & 112b	Sustainable Design and Climate Change	Ben Westwood / Jack Conroy	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Section	1	DC1 - Sustainable Design Principles (strategic)		Object	Our Client recognises the ambitions of achieving good design through embedding sustainable design principles. However, the Draft Policy includes additional policy wording following criteria a – e, replicated below: "All major new residential development will be required to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated". Whilst our Client recognises the role the toolkit can play in achieving high-quality, sustainable residential development, the wording of Draft Policy DC 1 risks being overly prescriptive contrary to the ambitions of the Building for a Healthy Life guidance itself. Firstly, our Client is concerned that the process for undertaking and evaluating the assessment, as per the current proposed wording inserted in Draft Policy DC 1, lacks clarity, with no information provided within the policy or supporting text in regard to the Council's expectations and overall administration of the assessment process. It is unclear as to who is expected to undertake the review of the Building for a Healthy Life Assessment, for example would this be undertaken internally by Council officers through a 'design review'-type process, or would a review of any Assessment be undertaken by a third-party, external consultancy. Further information should also be provided regarding our Client's role in the assessment process following submission, as the draft policy wording currently offers no clarity in respect of the expected involvement of applicants, and their ability to negotiate and liaise with the assessing body to inform the outcomes of any such review. Similarly, it is unclear whether the review of the Building for Healthy Life Assessment would incur an additional financial cost, and whether this would need to be borne by applicants despite the policy wording currently mandating applicants to provide the Assessment as a validation requirement. Our Client therefore requests that the Council clearly sets out both its standards and	Policy not currently clear on the BFHL assessment process. Approach to red scores too restrictive and inflexible, red scores should be weighed in the planning balance.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR113 & 114d	Sustainable Design and Climate Change	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy	1	DC1 – Sustainable Design Principles (strategic)		Neutral	Bellway supports the need to achieve well designed places and supports a clear policy approach on this topic. As a successful and experienced developer across the UK, Bellway recognise the benefits that well thought out design policy can have on both the amenity and safety of residents within developments. However, conversely, design policy which places undeliverable aspirations upon developments can become a barrier to development rendering schemes unfeasible and undeliverable in most extreme cases. The amendments to Policy DC1 to remove requirements for schemes to demonstrate energy efficiency measures and low carbon technologies is the correct approach. The requirement for proposals to demonstrate how they will reduce carbon emissions and improve energy performance is more appropriately addressed through validation requirements than as a policy requirement. In a similar vein, Bellway notes the policy requirement for a Building for a Healthy Life assessment to accompany future major residential development proposals. While Bellway has no objection to this requirement in principle and is already providing this assessment in neighbouring authorities such as County Durham, requirements relating to the submission of information with planning applications are not policy matters. As such, this paragraph should be removed from the policy, with DBC's validation checklist instead updated to reflect this requirement.	Support removal of energy efficiency measures and low carbon technologies. BFHL is not a policy matter and should be removed and added to the validation checklist.	The plan already contains a requirement for a Health Impact Assessment to be undertaken on larger schemes. The council is already developing design guidance with a view to adopting this as a supplementary plan in due course. Both Skerningham and Burtree allocations already have an assessment process in place which incorporates BFHL. It is not therefore considered necessary at the present time to include a further standalone BFHL assessment requirement in policy, which will also require additional resources to implement.	Yes	Remove BFHL
LPR127, 128 & 129e	Sustainable Design and Climate Change	Ros Kain	Historic England		Policy	1	DC1 - Sustainable Design Principles		Neutral	Shopfronts have been added to Policy DC1 (page 30). We suggest you refer to traditional shopfronts, both retention of existing, and replacement in appropriate style for the age of the building, to this policy with a signpost a to Policy ENV1. The design principles in this strategic policy are vague. Do they relate to contemporary designed shopfronts only? No reference is made to historic shopfronts in listed buildings and conservation areas. Add reference to Policy ENV1. See submission and ref to ENV1.	Reference should be made to traditional shopfronts. Design principles are currently vague and unclear if only relate to contemporary shopfronts. References needed to historic shop fronts in listed buildings and conservation areas with cross reference to ENV1 needed.	It is considered that the policy is sufficently clear and would apply to all types of shopfronts consistent with the current style and appearance. Policy ENV1 would still be considered for proposals relating to Listed Buildings or within Conservation Areas.	No	None
LPR127, 128 & 129f	Sustainable Design and Climate Change	Ros Kain	Historic England		Policy	1	DC1 - Sustainable Design Principles	4. Sustainable Design and Climate Change	Neutral	Shopfront Design Text. New shopfront design plays a role in improving the economic viability of town and local centres. Well-designed shopfronts, adverts and integral security measures contribute to attractive streets and public realm. What are the Council's design principles for the retention of existing traditional shopfronts, the replacement of a modern shopfront with a traditional shopfront design and where a contemporary design may be more appropriate? Shopfronts in listed buildings and conservations areas require more detailed guidance. This could be added as Policy ENV1 (G) Shopfronts. Suggested change - This policy text should be amended. Ideally detailed design guidelines for the repair and alteration of historic shopfronts and to establish traditional shopfront design principles should be produced for shopfronts in listed buildings, or where the building falls within a conservation area.	Unclear on the design principles and need for more detailed guidance for shopfronts affecting heritage assets. Detailed design guidance should be provided for the repair and alteration of historic shopfronts.	It is considered that the policy is sufficently clear and would apply to all types of shopfronts consistent with the current style and appearance. Policy ENV1 would still be considered for proposals relating to Listed Buildings or within Conservation Areas.	No	None

LPR052s	Sustainable Design and Climate Change	Louise Tait	Environment Agency		Section		DC1- Sustainable Design Principles	Other - contaminated land	Neutral	2021 Contaminated Land Inspection Strategy It is recommended that the current 2021 Contaminated Land Inspection Strategy for the Borough of Darlington should be referenced within the Local Plan.	2021 Contaminated Land Inspection Strategy It is recommended that the current 2021 Contaminated Land Inspection Strategy for the Borough of Darlington should be referenced within the Local Plan.	Comment noted and amendment proposed.	Yes	Reference to contaminated land strategy in 4.2.13	
	Sustainable Design and Climate Change	David Barton	Community Campaigner, Civic Heritage, InYouArea Ambassador for Southport		Section	2	DC2 – Climate Change (strategic)	4. Sustainable Design and Climate Change	Neutral	See Section FOUR of PDF response regarding climate change.	No specific comments made in relation to Policy DC2.	No specific comments made in relation to Policy DC2.	No	None	
LPR044e	Sustainable Design and Climate Change	Vanessa			Section	2	DC2 - Climate Change	4. Sustainable design and climate change		Energy efficiency requirements are currently set by Part L of Building Regs. Our policy must ensure all homes not started by the implementation date of the Future Homes Standard 2026 must meet it. Until then, we must push to require higher than Part L, to meet local inequality reduction / health needs & climate change targets. Solar panels & battery storage should be required except in exceptional situations, with property roofs oriented to facilitate this. At very least, this must be offered as an option, so purchasers can build any extra costs in with their mortgage, for ease. Request for guidance on commercial battery storage requirements. For Skerningham GV, more detailed energy efficiency standards were set out in the Design Code. The Local Plan must set out how these are met here, and if this Design Code was used elsewhere across the Borough. I welcome improved Building Regs compliance rules to demonstrate compliance. Policy DC2 requires large 300+ home developments to be heat network connection ready - I welcome this but would seek to reduce the cut-off to 200+ homes.	All homes should meet the future homes standard and prior to this being implemented higher than current Part L requirements.	Require higher standards above Future Homes Standards. Include requirement for solar panels and battery storage wherever possible. Further guidance required on BESS. Heat network connection lowered to 200 units.	Government have made clear that Councils shounld not seek energy efficiency standards above those set nationally. Building regulations cover the provision of solar panels. Policy guidance on BES is proposed.	Yes	
LPR051d	Sustainable Design and Climate Change	Chris Martin	HBF		Policy	2	DC2 - Climate Change		Neutral	HBF notes that this policy requires residential schemes to comply with the Future Homes Standard (criterion c). This is supported by the HBF as this is consistent with the Government's approach that local planning authorities should be using national standards for such requirements and not seek to introduce local standards. This is detailed in the 13 December 2023 Written Min-isterial Statement (reference: UIN HCWS123) and confirmed in the emerging revised NPPF. 23. The Future Homes Standard itself was published on 24 March 2026 and includes an implemen-tation period for developers to follow (with full rollout by March 2028). The Council will there-fore need to amend the policy text to refer to the Future Homes Standard and the implementation period. 24. The NPPF makes clear in paragraph 45 that documents submitted with planning applications should be kept to a minimum and that local planning authorities should only request supporting information that is relevant, necessary and material to the application in question. As compliance with the Future Homes Standard will be mandatory (subject to the implementation period) and it provides clear instructions on how developers should meet the standard, then the requirement for an Energy Statement (criterion a) is not justified in all cases and should only be requested where schemes voluntarily seek to go over and above the Future Homes Standard. 25. Policy DC2 also includes the Council's approach to embodied carbon. This includes the require-ment for residential developments of 150 homes or more to calculate their embodied carbon emissions through a nationally recognised methodology (criterion b). The HBF does not support this approach. Whilst there are a number of different methodologies for calculating embodied carbon, there is no single national methodology, furthermore data is not always readily available to undertake such	Support requirement to comply with Future Homes Standard and not introduce local standards as per government approach. Future Homes Standard now published so policy needs updating to reference it and the implementation period. In light of mandatory future homes standard the requirement for an Energy Statement should only apply where schemes voluntarily seek to go over and above the Future Home Standard. No specific standard referred to regarding assessing embodied carbon. Council should not set own standard until national standard produced.	Support noted. The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions.	Yes	Amend Future Homes Standard Reference and Specify embodied carbon method of assessment.	
LPR052c	Sustainable Design and Climate Change	Louise Tait	Environment Agency		Policy	2	DC2 - Climate Change		Neutral	Policy DC2 Climate Change We acknowledge that there is a standalone flood risk policy section within the local plan. However, climate change is a vital part of assessing the future flood risk for any development and this consideration should be included in the climate change section. This section should highlight that development will not take place in an area at risk of future flooding where possible and that climate change must be considered for flooding risk.	Whilst there is a standalone flood risk policy climate change is a vital part of assessing future flood risk so consideration should be included in the flood risk policy.	Reference to be added to flood risk in part 2a	Yes	Add in reference to flood risk and referring to policy DC3 in part 2a	
LPR053c	Sustainable Design and Climate Change	Patricia Meredith	Resident		Section	2	DC2 - Climate Change	4. Sustainable design and climate change		All homes not started before the Future Homes Standard (2026) must be required to meet it. Higher than Part L standards should be adopted immediately. Solar panels and battery storage should be required or at least offered as mortgage funded options. The Skerningham GV Design Code energy standards must be embedded in the Local Plan. The threshold for heat network readiness should be reduced from 300+ to 200+ homes. Stronger protection is needed for hedgerows, ancient trees, and existing biodiversity.	All homes should meet the future homes standard and prior to this being implemented higher than current Part L requirements. Solar panes and battery storage should be required. Skerningham Design Code energy standards should be embedded in Local Plan. Heat network threshold should be reduced from 300 to 200.	The FHS comes in to force on 24th March 2027 which will be before the Local Plan will be adopted so this won't apply. Renewable energy provision is required as part of the Future Homes Standard and the policy encourages renewable energy generation. The heat network threshold will be reviewed.	No		

LPR059 & 60b	Sustainable Design and Climate Change	Dominic Crowley	Lichfields		Policy	2	DC2 – Climate Change (strategic)		Object	The principles of the policy are generally accepted, but the following points are noted by Hallam Land: • Part 1b requires developments above the stated thresholds (150 homes or no-residential development of 10,000sqm or more) to calculate their embodied carbon emissions through a nationally recognised methodology and demonstrate the actions being taken to reduce those emissions. This is not considered sound as, whilst there are a range of nationally recognised approaches to calculating embodied carbon, there is currently no single standardised approach. This can result in inconsistencies in assumptions, quality of data available and ultimately, output of assessment. This will make it very difficult for the Council to apply a consistent approach to assessment in this respect without the introduction of more specific detailed methodological requirements. This approach would not be appropriate to introduce at a local authority level and would be contrary to the Government advice on application of technical policy standards. This policy requirement should therefore be removed from the Local Plan review, but could be reintroduced should a national standardised approach come forward, and the Council meet the relevant requirements for its adoption. Should this happen – the reference to required reductions should be reviewed accordingly to ensure any required reductions are sufficiently concise and quantified consistently with national requirements • Part 1c requires all residential development to, as a minimum, meet the energy efficiency requirements set out in the building regulations Future Homes Standard (2026) or successor standards. The policy states that should the standards not be incorporated into the building regulations prior to the adoption of the Local Plan, the standards set out in the Future Homes and Building Standards: 2023 consultation will be required. The compliance with these standards is mandatory (subject to the relevant transitional periods for implementation) under the associated building regulations and does not need to be duplicated in planning policy;	Future Homes Standard now published along with transitional arrangements which should be referenced in policy. Blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. Embodied carbon assessment requirement should be deferred until a nationally agreed Framework is established. Clarify where feasible in relation to water efficiency standards.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions. Where feasible has been removed to avoid uncertainty.	Yes	Remove 'where feasible'. Amend Future Homes Standard Reference and Specify embodied carbon method of assessment.
LPR064 & 065d	Sustainable Design and Climate Change	Nick Pleasant	Stantec on behalf of Vistry		Policy	2	DC2 – Climate Change (strategic)		Support	Vistry supports the need to achieve reductions in carbon emissions and the pressing need for sustainability to be incorporated into all business practices across the sector. However, Vistry wishes to highlight that while the objectives of Policy DC2 are supported in principle, to ensure large scale residential schemes are delivered within Darlington (a borough with historic delivery issues regarding large allocations) the policy needs to be applied in a proportionate and flexible manner which has regard to development viability and deliverability. The cumulative impact of the policy requirements including detailed energy and embodied carbon assessments, on site renewable generations, provision for future heat network connections and building performance standards beyond current Building Regulations may result in significant additional construction costs and design constraints, particularly when combined with other policy obligations. The council should be careful to not impose overly burdensome requirements on developments as this can slow or prevent delivery. Vistry would request DBC reconsider the policy to ensure it explicitly recognises site specific viability and feasibility considerations, allowing alternative or phased solutions where appropriate to ensure the delivery of large-scale housing sites and the benefits of these is not adversely affected. Overly-stringent requirements of this policy could result in the deliverability of development schemes in the Borough becoming more challenging to achieve. In addition, Vistry notes the requirement for major residential developments to make provisions for future heat network connections, however this may present viability and deliverability challenges, where there is uncertainty over the provision, timing and funding of such infrastructure. This part of the policy therefore needs to be ensured that heat network enablement is subject to robust feasibility and viability testing and applied flexibility where such requirements risk prejudicing the deliverability of developments. At present no evidence base has been published which can justify such	Policy needs to recognise site specific viability and feasibility considerations.	All requirements are factored in to viability testing and reference is made to where feasible and viable for the relevant elements of the policy	No	
LPR067 & 68c	Sustainable Design and Climate Change	Georgina Cox	Gladman		Policy	2	DC2 – Climate Change (strategic)		Neutral	See submitted attachment. The above policy includes the requirement for residential schemes of 150 dwellings or more to calculate their embodied carbon emissions through a nationally recognised methodology (criterion b). There are a number of different methodologiesfor calculating embodied carbon. This means that the calculations that the council will receive will lack consistency and are incomparable. The Government is yet to publish its own methodology and advises local planning authorities to not set their own standards on the above matter, therefore the council should not be requiring schemes to measure their embodied carbon until the Government publishes a national standard and methodology.	Number of different methodologies so current approach will result in inconsistencies and the ability to compare. Council should not require embodied carbon assessment until a national standard and methodology is produced	Further clarity to be provided on embodied carbon emissions standard and methodology	Yes	Specify standard and methodology to be used.
LPR067 & 68m	Sustainable Design and Climate Change	Georgina Cox	Gladman		Policy	2	DC2 – Climate Change (strategic)		Neutral	See submitted attachment. The above policy includes the requirement for residential schemes of 150 dwellings or more to calculate their embodied carbon emissions through a nationally recognised methodology (criterion b). There are a number of different methodologies for calculating embodied carbon. This means that the calculations that the council will receive will lack consistency and are incomparable. The Government is yet to publish its own methodology and advises local planning authorities to not set their own standards on the above matter, therefore the council should not be requiring schemes to measure their embodied carbon until the Government publishes a national standard and methodology.	Number of different methodologies so current approach will result in inconsistencies and the ability to compare. Council should not require embodied carbon assessment until a national standard and methodology is produced	Further clarity to be provided on embodied carbon emissions standard and methodology	Yes	Specify standard and methodology to be used.
LPR071e	Sustainable Design and Climate Change	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy	2	DC2 – Climate Change (strategic)		Unknown	Policy DC2 sets out the Council's approach to embodied carbon. The NPPF makes clear in paragraph 45 that documents submitted with planning applications should be kept to a minimum and that local planning authorities should only request supporting information that is relevant, necessary and material to the application in question. As compliance with the Future Homes Standard will be mandatory (subject to the implementation period) and it provides clear instructions on how developers should meet the standard, then the requirement for an Energy Statement (criterion a) is not justified in all cases and should only be requested where schemes voluntarily seek to go over and above the Future Homes Standard. Similarly the requirement for residential developments of 150 homes or more to calculate their embodied carbon emissions through a nationally recognised methodology (criterion b) is an unnecessary policy burden, as there is no Government published methodology for calculating embodied carbon. The lack of guidance is acknowledged in supporting paragraph 4.4.2, and reference to 'future guidance' indicates that the policy requirement is premature.	In light of mandatory future homes standard the requirement for an Energy Statement should only apply where schemes voluntarily seek to go over and above the Future Home Standard. No specific standard referred to regarding assessing embodied carbon. Council should not set own standard until national standard produced.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions.	Yes	Embodied carbon clarity

LPR084b	Sustainable Design and Climate Change	Tony Gillam	Resident		Section	2	DC2 - Climate Change	4. Sustainable design and climate change		Sustainability & Health All homes not started before the Future Homes Standard (2026) must be required to meet it. Higher than Part L standards should be adopted immediately. Solar panels and battery storage should be required or at least offered as mortgage funded options. The Skerningham GV Design Code energy standards must be embedded in the Local Plan. The threshold for heat network readiness should be reduced from 300+ to 200+ homes. Stronger protection is needed for hedgerows, ancient trees, and existing biodiversity.	All homes should meet the future homes standard and prior to this being implemented higher than current Part L requirements. Solar panes and battery storage should be required. Skerningham Design Code energy standards should be embedded in Local Plan. Heat network threshold should be reduced from 300 to 200.	The FHS comes in to force on 24th March 2027 which will be before the Local Plan will be adopted so this won't apply. Renewable energy provision is required as part of the Future Homes Standard and the policy encourages renewable energy generation. The heat network threshold will be reviewed.	No	
LPR085c	Sustainable Design and Climate Change	Matthew Hewitt	Hamilton Willis		Policy	2	DC2- Climate Change		Neutral	what evidence exists to justify the increased and new policy requirements? Has the updated policy been viability tested?	Questions is there evidence and viability testing to justify increased and new policy requirements	Yes the policy requirements will be subject to viability testing and are considered to be justified.	No	None
LPR087c	Sustainable Design and Climate Change	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	2	DC2- Climate Change		Object	Our Client supports the overarching intention of Policy DC 2 for residential development to contribute to the mitigation of, and adaptation to, the effects of climate change; however, a number of criteria are not justified, effective or consistent with the NPPF. Such matters are addressed in turn below. Policy DC 2, as drafted at Part 1 (a) and (b), requires "all development proposals" to provide an energy statement in order to demonstrate compliance with a prescribed 'energy hierarchy', as well as outline efforts undertaken to minimise embodied carbon. The Council will be aware of the forthcoming introduction of the Future Homes Standard, which will impose a mandatory requirement on new development, supported by detailed national guidance. In this context, it is unclear why the Policy includes requirements that are reflected within the Building Regulations. Our Client therefore considers that the Policy results in the unnecessary duplication of national standards, and associated material considerations. These do not need to be reiterated within draft Policy DC 2. The reaffirm this position, paragraph 45 of the NPPF states that Local Planning Authorities should only request supporting information that is relevant, necessary and material to the application in question. In this context, where development proposals will be required, following any transitional period, to comply with the Future Homes Standard and its associated guidance, it is not considered necessary to require an additional energy statement to demonstrate compliance with overlapping energy efficiency and climate change mitigation principles. On this basis, the requirement for an energy statement would also conflict with the guidance set out under NPPF paragraph 16(f) which requires plans, and by association, polcies, to serve a clear purpose, avoiding unnecessary duplication. Our Client therefore requests that the references to the requirement to prepare an energy statement under criteria (a) and (b) of Part 1 are removed to ensure compliance with the NPPF.	Future Homes Standard now published along with transitional arrangements which should be referenced in policy. Blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. Embodied carbon assessment requirement should be deferred until a nationally agreed Framework is established.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions.	Yes	Embodied carbon clarity
LPR092i	Sustainable Design and Climate Change	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy	2	DC2- Climate Change (strategic policy)		Object	Policy DC2 includes the requirement for development proposals to meet the requirements of the prevailing Heat Network Zoning regulations where applicable and also for developments of over 300 homes or more to be enabled for heat network connection unless demonstrated not to be feasible or financially viable to do so. Whilst it is acknowledged that there is flexibility in the wording of the policy, the requirements are very onerous. There is no evidence base documents to support these requirements, including a Whole Plan Viability Assessment and, as such, they are not justified.	Heat Network requirements onerous and lacking evidence.	Continuation of policy from existing Local Plan currently included in Policy IN10. Policy is subject to feasibility and viability.	No	
LPR094c	Sustainable Design and Climate Change	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469239	Policy	2	Policy DC 2 Climate Change		Support/Object	Paragraph 45 of the NPPF is explicit that LPA's should: 'only request supporting information that is relevant, necessary and material to the application in question.' In view of the above, and with Future Homes Standard set to become mandatory (subject to the implementation period), the requirement for an Energy Statement under criterion a is superfluous and should be removed. Compliance with the required standards would be secured via other (non-planning) regimes.	Energy Statement not necessary due to introduction of Future Homes Standard	Energy Statement applies to whole development including layout etc not just the energy efficiency of individual dwellings which the Future Homes Standard relates to.	No	
LPR102j	Sustainable Design and Climate Change	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Conisclife Road, Darlington, DL3 7EH	Policy	2	DC2 - Climate change (strategic policy)		Object	Policy DC2 includes the requirement for development proposals to meet the requirements of the prevailing Heat Network Zoning regulations where applicable and also for developments of over 300 homes or more to be enabled for heat network connection unless demonstrated not to be feasible or financially viable to do so. Whilst it is acknowledged that there is flexibility in the wording of the policy, the requirements are very onerous. There is no evidence base documents to support these requirements, including a Whole Plan Viability Assessment and, as such, they are not justified.	Heat Network requirements onerous and lacking evidence.	Continuation of policy from existing Local Plan currently included in Policy IN10. Policy is subject to feasibility and viability.	No	
LPR104h	Sustainable Design and Climate Change	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621223	Policy	2	Policy DC 2: Climate Change (Strategic Policy)		Unknown	8.1 Taylor Wimpey supports the principles of Policy DC2, however the approach towards climate change need to be compliant with the Framework and national policy. Justification 8.2 Policy DC2 requires residential development to comply with the Future Homes Standard (criterion c). This approach is supported by Taylor Wimpey, as it aligns with the Government's clear position that local planning authorities should apply nationally prescribed standards for energy efficiency, rather than introducing locally derived requirements. This position is set out in the Written Ministerial Statement of 13 December 2023 (UIN HCWS123) and is reflected in the revised Framework. 8.3 The Future Homes Standard was published on 24 March 2026 and includes a clear implementation period, with full compliance required from March 2028. The policy wording should therefore be updated to explicitly reference the Future Homes Standard and its transitional arrangements, to ensure clarity and consistency with national policy. 8.4 The Framework is clear that information required to support planning applications should be proportionate and limited to what is relevant, necessary and material to decision-making. Given that compliance with the Future Homes Standard will be mandatory (subject to the implementation period) and provides a defined route to achieving the required performance outcomes, the blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. 8.5 Policy DC2 also proposes a requirement for residential developments of 150 dwellings or more to calculate embodied carbon emissions using a nationally recognised methodology (criterion b). This approach is not supported by the HBF. At present, there is no single nationally endorsed methodology for assessing embodied carbon, and data availability remains inconsistent. As a result, submissions would lack consistency and comparability, limiting their effectiveness for decision-making. 8.6 In the absence of a national standard or methodology for measuring embodied	Future Homes Standard now published along with transitional arrangements which should be referenced in policy. Blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. Embodied carbon assessment requirement should be deferred until a nationally agreed Framework is established.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions.	Yes	Embodied carbon clarity

LPR105h	Sustainable Design and Climate Change	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621225	Policy	2	DC2 - Climate Change (Strategic Policy)		Support	Taylor Wimpey supports the principles of Policy DC2, however the approach towards climate change need to be compliant with the Framework and national policy. Policy DC2 requires residential development to comply with the Future Homes Standard (criterion c). This approach is supported by Taylor Wimpey, as it aligns with the Government's clear position that local planning authorities should apply nationally prescribed standards for energy efficiency, rather than introducing locally derived requirements. This position is set out in the Written Ministerial Statement of 13 December 2023 (UIN HCWS123) and is reflected in the revised Framework. 8.3 The Future Homes Standard was published on 24 March 2026 and includes a clear implementation period, with full compliance required from March 2028. The policy wording should therefore be updated to explicitly reference the Future Homes Standard and its transitional arrangements, to ensure clarity and consistency with national policy. 8.4 The Framework is clear that information required to support planning applications should be proportionate and limited to what is relevant, necessary and material to decision-making. Given that compliance with the Future Homes Standard will be mandatory (subject to the implementation period) and provides a defined route to achieving the required performance outcomes, the blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. 8.5 Policy DC2 also proposes a requirement for residential developments of 150 dwellings or more to calculate embodied carbon emissions using a nationally recognised methodology (criterion b). This approach is not supported by the HBF. At present, there is no single nationally endorsed methodology for assessing embodied carbon, and data availability remains inconsistent. As a result, submissions would lack consistency and comparability, limiting their effectiveness for decision-making. In the absence of a national standard or methodology for measuring embodied carbon, and given the Government's position that local authorities should not set their own	Future Homes Standard now published along with transitional arrangements which should be referenced in policy. Blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. Embodied carbon assessment requirement should be deferred until a nationally agreed Framework is established.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions.	Yes	Embodied carbon clarity
LPR107a	Sustainable Design and Climate Change	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Policy	2	DC2 - Climate Change (Strategic Policy)		Neutral	This policy states that major non-residential development will be required to meet BREEAM 'excellent' standard. We would encourage a more flexible approach to the application of this policy as there have been and are likely to be schemes in the future that are required to comply with other comparable standards or cannot achieve 'excellent' for a variety of reasons. We would encourage the Council to add in a reference as set out below: Minor non-residential development of 999 sqm floorspace or less will be required to meet BREEAM 'Very Good' standard. Major non-residential development of 1,000 sqm floorspace or more will be required to meet BREEAM 'Excellent' standard unless it can be demonstrated that best practice in sustainable design has been adopted and is more appropriate as demonstrated through a Sustainability Statement.	Add in caveat to BREEAM Excellent Standard.	Suggest modification not sufficently clear what the best practice in sustaianble design would be. Amendment not considered necessary to provide certainty on measures to achieve.	No	
LPR111 & 112c	Sustainable Design and Climate Change	Ben Westwood / Jack Conroy	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	2	DC2 - Climate Change (Strategic Policy)		Object	Our Client supports the overall intention of Draft Policy DC2 for residential development to contribute towards mitigating and adapting to the effects of climate change; however, several criteria are not considered to be justified, effective, or consistent with the NPPF. These are taken in turn, below. Part 1 Draft Policy DC2, as currently drafted at Part 1 (a) and (b), requires "all development proposals" to provide an energy statement in order to demonstrate compliance with a prescribed 'energy hierarchy', as well as outline efforts undertaken to minimise embodied carbon. The Council will be aware of the forthcoming introduction of the Future Homes Standard, a mandatory requirement for new developments to adhere to with detailed underpinning guidance. The NPPF, at paragraph 45, outlines that Local Planning Authorities should only request supporting information that is relevant, necessary and material to the application in question. In this regard, if development proposals are already required (post-transitional period) to accord with the Future Homes Standard guidance, it is not necessary to seek an energy statement that would demonstrate accordance with the underpinning energy efficiency and climate change mitigation principles. In this regard, the request for an energy statement would be contrary to the guidance set out under NPPF paragraph 16(f) which requires plans, and by association, polcies, to serve a clear purpose, avoiding unnecessary duplication, as well as the requirements of NPPF paragraph 45. Our Client thereby requests that where reference is made to the requirement to produce an energy statement at criteria (a) and (b) of Part 1, this is deleted to ensure its compliance with the NPPF. Our Client also wishes to reiterate that they reserve the right to further comment at later stages of the Local Plan Review consultation in this regard. Continuing with Part 1, criteria (b) requires residential developments of 150 or more homes to calculate embodied carbon emissions through a 'nationally recognised methodology' to demonstrate efforts being undertaken to minimise these emissions.	Future Homes Standard now published along with transitional arrangements which should be referenced in policy. Blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. Embodied carbon assessment requirement should be deferred until a nationally agreed Framework is established. Question 150 homes threshold.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions. The 150 homes is condsidered to be an apprirate amount of development from which the requirement should apply to that is proportionate reflecting scale of development proposals in the Borough.	Yes	Embodied carbon clarity
LPR113 & 114e	Sustainable Design and Climate Change	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy	2	DC2 – Climate Change (strategic)		Neutral	Bellway support the need to achieve reductions in carbon emissions and the pressing need for sustainability to be incorporated into all business practices across the sector. However, Bellway wish to highlight that while the objectives of Policy DC2 are supported in principle, to ensure large scale residential schemes are delivered within Darlington (a borough with historic delivery issues regarding large allocations) the policy needs to be applied in a proportionate and flexible manner which has regard to development viability and deliverability. The cumulative impact of the policy requirements including detailed energy and embodied carbon assessments, on site renewable generations, provision for future heat network connections and building performance standards beyond current Building Regulations may result in significant additional construction costs and design constraints, particularly when combined with other policy obligations. Bellway would therefore request DBC reconsider the policy to ensure it explicitly recognises site specific viability and feasibility considerations, allowing alternative or phased solutions where appropriate to ensure the delivery of large-scale housing sites and the benefits of these is not adversely affected. Overly-stringent requirements of this policy could result in the deliverability of development schemes in the Borough becoming more challenging to achieve. In addition, Bellway note the requirement for major residential developments to make provisions for future heat network connections, however this may present viability and deliverability challenges, where there is uncertainty over the provision, timing and funding of such infrastructure. This part of the policy therefore needs to be ensured that heat network enablement is subject to robust feasibility and viability testing and applied flexibility where such requirements risk prejudicing the deliverability of developments. At present no evidence base has been published which can justify such requirements.	Concerns with cumulative effects of policy requirements. Heat network should be subject to robust feasibility and viability requirements.	Policies will be subject to viability testing. Heat network requirements are subject to feasibility and viability.	No	

LPR116f	Sustainable Design and Climate Change	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	2	DC2- Climate Change (strategic)		Object	Part 1, Criteria (a) and (b) of Policy Draft Policy DC2 requires the provision of an energy statement for "all development proposals" to demonstrate compliance with a prescribed 'energy hierarchy' and to outline efforts undertaken to minimise embodied carbon. With the forthcoming introduction of the Future Homes Standard, a mandatory requirement for new developments to adhere to with detailed underpinning guidance, it is unclear why the Council requires further information to demonstrate energy efficiency and climate change mitigation principles. National Planning Policy Framework ('NPPF') Paragraph 45 confirms that local planning authorities should only request supporting information that is 'necessary'. In this regard, if development proposals are already to be mandated (post-transitional period) to accord with Future Homes Standard guidance, seeking an energy statement to demonstrate accordance with similar, overlapping energy efficiency and climate change mitigation principles is not considered 'necessary'. Similarly, NPPF Paragraph 16(f) requires plans, and by association the underpinning planning policies, to serve a clear purpose and avoid duplication. As such, we would suggest that Criteria (a) and (b) within Part 1 of Draft Policy DC2, where requiring (without exception, as per the current draft policy wording) an energy statement for all development proposals, is deleted. Criterion (b) also requires residential developments of 150 or more homes, or non-residential development of 10,000sqm or more, to calculate embodied carbon emissions through a 'nationally recognised methodology' to demonstrate efforts being undertaken to minimise these emissions. Firstly, it is unclear how the Council has determined the above thresholds to be justified and robust; no evidence is provided to evidence how these arbitrary figures are appropriate as benchmarks for such analysis being required. We cannot therefore comment on the soundness of the draft policy at this time, until such clarifications are provided by the Council. Secondly, the criterion makes reference to the use of a "nationally recognised methodology" to assess	Future Homes Standard now published along with transitional arrangements which should be referenced in policy. Blanket requirement for an Energy Statement (criterion a) is not justified in all cases. Such information should only be sought where proposals seek to exceed national requirements. Embodied carbon assessment requirement should be deferred until a nationally agreed Framework is established.	The policy will be updated in light of the publication of the Future Home Standard. The energy statement is required in relation to a range of measures not just energy efficiency. This is just one element of the energy hierarchy with a range of other measures to address from the measures employed to minimise energy demand, maximise renewable energy generation and storage on site, utilising renewable and local carbon energy, minimising embodied carbon emissions. Further clarity to be provided on the standards for embodied carbon emissions.	Yes	Embodied carbon clarity
LPR117c	Sustainable Design and Climate Change	James Beackon	NHS Property Services		Policy	2	DC2- Climate Change (strategic)		Support	Draft Policy DC 2 seeks to ensure development minimises the impact of and increases resilience to the effects of climate change. NHSPS fully support policies that promote sustainable and carbon neutral development. We would highlight that NHS property could benefit from carbon offset funds and recommend the Council to consider the implementation of policies related to net zero. The securing of financial contributions where on-site carbon mitigation requirements cannot be met would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	highlight that NHS property could benefit from carbon offset funds and recommend the Council to consider the implementation of policies related to net zero. The securing of financial contributions where on-site carbon mitigation requirements cannot be met would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	Comments noted. Council does not currently have sufficient evidence to justify seeking financial contributions.	No	
LPR120f	Sustainable Design and Climate Change	Councillor Bryony Holroyd			Section	2	DC2- Climate Change (strategic)		Neutral	See full comment LPR120 online.	Require higher standards above Future Homes Standards. Include requirement for solar panels and battery storage wherever possible. Further guidance required on BESS. Heat network connection lowered to 200 units.	Government have made clear that Councils shounld not seek energy efficiency standards above those set nationally. Building regulations cover the provision of solar panels. Policy guidance on BES is proposed.	Yes	BESS Policy
LPR125&126b	Sustainable Design and Climate Change	Josh White	Natural England		Policy	2	DC2- Climate Change (strategic)		Neutral	The Plan should recognise that climate change mitigation and adaptation and biodiversity loss are interlinked. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Consideration also needs to be given to the likely impacts of climate change on protected sites, habitats and species.	The Plan should recognise that climate change mitigation and adaptation and biodiversity loss are interlinked. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Consideration also needs to be given to the likely impacts of climate change on protected sites, habitats and species.	Comments noted, other policies do set out some of these measures where relevant to Darlington in the Environment section.	No	
LPR127, 128 & 129g	Sustainable Design and Climate Change	Ros Kain	Historic England		Policy	2	DC2- Climate Change (strategic)		Support	We fully support the addition of this strategic policy and the commitment to the reuse of buildings. Our guidance Advice Note 14 HEAG321 Adapting Historic Buildings for Energy and Carbon Efficiency should be added to the supporting text. Historic England estimate that empty space in historic properties can deliver 670,000 residential units across England. Repurposing built heritage can help create dynamic, comforting, and sustainable living places Heritage Works for Housing | Historic England. provides evidence on how empty floor space in traditional properties can contribute to housing delivery. In the case of listed buildings, and those in a conservation area which add to character and appearance, securing new uses is an established constructive conservation principle. However, for Darlington's buildings which are not heritage assets but are of solid traditional construction (pre-1919), this policy could be specifically applied. Is it possible to link this policy to non-designated heritage assets? We also support the reuse of materials. If partial demolition or full demolition of an existing structure is deemed to be acceptable how will this be controlled? How will the use of locally sourced materials be controlled and monitored? How will this policy be applied to the allocations. The strategic allocations for example. Should this be written into the site requirements? Suggested change - Amend, expand to clarify as set out in comments.	Reference to HE Guidance Note 18 recommended. Seek clarity on how agreed demolition will be controlled and how the use of locally sourced materials will be ocntrolled and monitored.	Reference added to Guidance note in supporting text. Other issues can be addressed through the implementation of conditions at the application stage.	Yes	Reference to guidance note added

LRP123k		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		DC2 Climate Change			HLL/HE note the range of requirements for demonstrating good design which minimises energy consumption. Whilst there is no objection in principle to these measures many of which increasingly form part of standard design practice, policy DC2 should add a general caveat that site suitability and viability is also a consideration on this topic. This is referenced to some criteria such as Heat Zoning Network Regulations but not all. Furthermore, the requirement for an energy statement which includes an embodied carbon emissions calculation could raise additional queries from applicants in due course. The "nationally recognised" calculation method is not specified and could be open to interpretation. The level of assessment should be proportionate to the information available, as an example on outline development proposals any assessment would be based on assumptions. It is assumed that the assessment would focus on the operation of the proposed development rather than the construction phase which faces greater challenges at managing carbon emissions, albeit on a temporary basis. Where the impact upon CO2 emissions has the potential to be significant, taking into account design mitigation, this information would be required as part of an Environmental Impact Assessment screening process and potentially its subsequent Environmental Statement if a range of likely significant effects are identified. Therefore, the information required for 150 dwellings should align to the level of detail required for EIA screening rather than a more detailed assessment which would typically be required for EIA development.	Site suitability and viability should be added to a caveat to whole policy. Unclear on embodied carbon methodology. Requirements should align with EIA requirements	Site suitability and viability recognised at necessary points. Viability testing factoring in requirements. Amendment proposed regarding embodied carbon.	Yes	Embodied carbon clarity
LPR133a		Katherine Dobson	NWL		Section		DC2 Climate Change		Support	We support policy DC2 Climate Change (Strategic Policy) and we note particularly point 2 c). and d). of that policy. We are currently producing a Water Efficiency Statement for the Northumbrian Water operating area which will identify targets to be achieved and set out the evidence driving these targets. We will share this statement with Darlington as soon as we can, but we do support your recognition of seeking to achieve a lower per capita consumption of water and supporting water saving and efficiency measures in new development.	Support for parts 2c and 2d. Further information to be provided on Water Efficiency Statement.	Support noted and further information welcomed.	No	None
LPR133a		Katherine Dobson	NWL		Section		DC3 - Flood Risk & Water Management (strategic)		Support	We support policy DC3 Flood Risk and Water Management (Strategic Policy). We note the listing of the preference of hierarchy for surface water management, by minimise, control and separation. We suggest that the Local Planning Authority considers amending the preferential list to include the new addition set out in the National Standards for Sustainable Drainage Systems (SuDS) released in July 2025 which now includes as "priority 1" - to be collected on site for non-potable use - https://www.gov.uk/government/publications/nationalstandards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainagesystems-suds. We also request that a reference is made within this policy to seek developers to undertakea formal Pre-Planning Enquiry application with Northumbrian Water which will be required to inform their Drainage Strategy as part of any masterplanning design or planning application. It is very important that all new development carefully and evidentially demonstrates assessment of the preference of hierarchy for surface water disposal to avoid further deterioration of spills.	Support. Amend drainage hierarchy to reflect updated standards and refer to non-potable. Refer developers to consult Northumbrian Water.	Comments noted and amendments proposed	Yes	Add in non-potable uses as priority 1 in policy. Additional wording to encourage developers to submit pre-planning enquiry added to supporting text.
LPR037a	Sustainable Design and Climate Change	William Ward	The Woodland Trust		Policy	3	DC3 - Flood Risk & Water Management (strategic)		Support	The Woodland Trust supports the inclusion of the policy on flood risk and water management within the Local Plan. This is a vital area of planning policy, particularly in the context of increasing climate pressures, and it is encouraging to see a clear commitment to reducing flood risk and promoting resilient development. The reference to sustainable drainage systems (SuDS) is especially positive. To strengthen the policy further, it would be beneficial to include explicit reference to natural flood management (NFM) measures and to actively encourage their use alongside conventional drainage approaches. NFM techniques can play a significant role in slowing the flow of water, increasing infiltration, and reducing downstream flood risk, while also enhancing biodiversity and landscape value. In particular, the policy could highlight the importance of upland and riparian tree planting as part of a wider catchment-based approach to flood management. Tree planting in upland areas can help to intercept rainfall and reduce rapid runoff, and riparian planting along watercourses can stabilise banks and help regulate water flows.	Supports the inclusion of the policy on flood risk and water management within the Local Plan. This is a vital area of planning policy, particularly in the context of increasing climate pressures, and it is encouraging to see a clear commitment to reducing flood risk and promoting resilient development. The reference to sustainable drainage systems (SuDS) is especially positive. To strengthen the policy further, it would be beneficial to include explicit reference to natural flood management (NFM) measures and to actively encourage their use alongside conventional drainage approaches. NFM techniques can play a significant role in slowing the flow of water, increasing infiltration, and reducing downstream flood risk, while also enhancing biodiversity and landscape value.	Darlington Borough is not located in the uplands so the measures suggested are not as applicable as they would be in the neighbouring areas of County Durham and North Yorkshire. Reference is made to natural drainage features.	No	None
LPR049	Sustainable Design and Climate Change	Ken Maddison - submission 1	Resident		Policy	3	DC3 - Flood Risk and Water Management (strategic)		No Answer	I think it would be prudent to simple take out section 11 and 12 – "discharge to combined sewer" as this would go against all the latest government and NWL goals along with environmental policies. This should just not be an option and the others method and approaches must be used and encouraged ! It would be more than useful if the document could provide some policy on reducing any additional flow into the combined system even to go as far to encourage separation of the system for both development and within all DBC highway and car park work.	I think it would be prudent to simple take out section 11 and 12 – "discharge to combined sewer" as this would go against all the latest government and NWL goals along with environmental policies. This should just not be an option and the others method and approaches must be used and encouraged ! It would be more than useful if the document could provide some policy on reducing any additional flow into the combined system even to go as far to encourage separation of the system for both development and within all DBC highway and car park work.	Comments noted. This hierarchy is set out consistent with National Planning Practice Guidance. A further sentence has been added to emphasise that evidence the hierarchical order must be followed. The policy does state that discharge to combined sewers is a last resort.	No	
LPR049c	Sustainable Design and Climate Change	Ken Maddison - submission 1	Resident		Policy	3	DC3 - Flood Risk and Water Management (strategic)		No comment	No comment.	No comment	N/A	No	

LPR052d	Sustainable Design and Climate Change	Louise Tait	Environment Agency		Policy	3	DC3 - Flood Risk and Water Management (strategic)		Neutral	Policy DC3 Flood Risk and Water Management Criterion a. states that development proposals will be designed to ensure they will be safe over the lifetime of the development. However, this should also include access and egress to individual buildings as well as the development site itself. Criterion b. states that development proposals will be designed to ensure flood risk is not increased elsewhere and will, where possible, reduce flood risk overall. This criterion should be expanded upon or additional supporting text added to the policy to make clear that this can only be achieved by either building outside of flood zone 3 or by providing compensatory storage at the location/development site. Development should be located outside of flood zones 2 and 3 where alternatives exist. We would recommend further consideration within the supporting text of policy DC3 for development proposals to demonstrate compliance with Water Framework Directive objectives and be informed by and consistent with Environment Agency guidance, the relevant River Basin Management Plan, flood risk management requirements, and any applicable local or catchment-scale management plans. In paragraph 4.8.12 (supporting text to Policy DC3), the importance of the Magnesian Limestone aquifer as a source of water for a large number of water supplies and a highly sensitive environmental receptor is mentioned. The location of source protection zones within this aquifer and their importance should also be highlighted and discussed as these are particularly sensitive and need protecting.	Criteria (a) should also include access and egress to individual buildings as well as the development site itself. Criteria (b) this should be expanded on to make clear that this can only be achieved by either building outside of flood zone 3 or by providing compensatory storage at the location/development site. We would recommend further consideration within the supporting text of policy DC3 for development proposals to demonstrate compliance with Water Framework Directive objectives and be informed by and consistent with Environment Agency guidance, the relevant River Basin Management Plan, flood risk management requirements, and any applicable local or catchment-scale management plans. With regards to the Magnesian Limestone aquifer the location of source protection zones with the aquifer and their importance should also be highlighted and reference their sensitivity and need for protection.	Update to criteria (a) will be undertaken as suggested. Concern that the alteration suggested within criteria (b) could result in conflicting principles within the policy and in comparison to national policy. Further updates to the supporting considered suitable.	Yes	Update criteria (a) within policy DC3 as suggested - including access and egress to individual buildings. Update supporting text in relation to the aquifer source protection zones.
LPR052r	Sustainable Design and Climate Change	Louise Tait	Environment Agency		Policy	3	DC3 - Flood Risk and Water Management (strategic)		Neutral	Sustainable Urban Drainage Systems (SuDs) SuDs are mentioned throughout both the Local Plan and the Sustainability Appraisal. The inappropriate use of SuDs can result in adverse impacts such as groundwater flooding and water quality issues. The guidance within the 'EA's approach to GW protection' document is required to be considered when SuDs are proposed for use. SuDs within areas of historical contamination and/or within Source Protection Zones and groundwater abstractions may not be appropriate and would need to be carefully considered. In addition, our position is when any major development is proposing infiltration SuDs in areas affected by coal mining the applicant will need to consider groundwater, mine water and below ground pathways in any risk assessment or site investigation work. Examples of risk assessments are desk studies, preliminary risk assessments (PRAs), coal mining risk assessments (CMRAs), flood risk assessments (FRAs), Environmental Impact Assessments (EIAs) and Hydrogeological Risk Assessments (HRAs). The northwestern area of The Darlington Borough Council administrative boundary is underlain by coal measure strata along with historic coal mining. Therefore, the use of SuDs within the Darlington Borough Council administrative area would need to be carefully considered within these areas as they may not be appropriate for all new developments.	The inappropriate use of SuDs can result in adverse impacts such as groundwater flooding and water quality issues. The guidance within the 'EA's approach to GW protection' document is required to be considered when SuDs are proposed for use. When any major development is proposing infiltration SuDs in areas affected by coal mining the applicant will need to consider groundwater, mine water and below ground pathways in any risk assessment or site investigation work. The northwestern area of The Darlington Borough Council administrative boundary is underlain by coal measure strata along with historic coal mining. Therefore, the use of SuDs within the Darlington Borough Council administrative area would need to be carefully considered within these areas as they may not be appropriate for all new developments.	Comments noted. EA guidance document to be referenced in criteria f of DC3.	Yes	Add EA SuDs guidance document to criteria f of DC3.
LPR097	Sustainable Design and Climate Change	Irene Ord	Resident		Policy	3	DC3 - Flood Risk and Water Management (strategic)		Support	Policy DC3 Flood risk & Water Management. Discharge to combined sewers is the last resort but too frequently being used. SuDs have become a default mechanism where the town's older systems are ageing and weak. SuDs must to be well-funded by those who use them and be reliably maintained – which may become economically more difficult over time. Flooding/breakdown could be catastrophic.	Discharge to combined sewers is the last resort but too frequently being used. SuDs have become a default mechanism where the town's older systems are ageing and weak. SuDs must to be well-funded by those who use them and be reliably maintained – which may become economically more difficult over time. Flooding/breakdown could be catastrophic.	Policy does emphasise discharge to combined sewer is a last resort and further emphasis has been placed on this within the policy. Policy requires whole life management and maintenance of SuDs.	No	None
LPR125&126c	Sustainable Design and Climate Change	Josh White	Natural England		Policy	3	DC3 - Flood Risk and Water Management (strategic)		Support	Natural England welcomes the inclusion of SuDS in Policy DC 3 as a way to mitigate against flood risk.	Support inclusion of SuDs as a way to mitigat flood risk.	Support Noted	No	None

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Se	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR044d	Healthy Communities	Vanessa			Section			5. Healthy communities	Object	Land is often allocated to build local services, then not delivered. The council must build in mechanisms, e.g. developer payment towards delivery, to guarantee adequate services for all new developments. Could Neighbourhood Plans help? Policy may be required to by default enable Neighbourhood Forums to manage community green space etc., to prevent problematic leasehold arrangements. Development sites close to sites of high traffic & parking pressure must be modelled including that existing traffic/parking demand, and parking restrictions / resident parking zones built in from the outset to prevent amenity / obstruction issues. Travel plans must be required for all development over 10 homes, and employment sites, with escrow payment to Modeshift (/equivalent) to ensure its implementation.	Land is allocated for health provision but does not guarentee delivery of services. Could Neighbourhood Plans or Forums help? Things like residents parking zones should be built in to prevent an issue arising in the first place. Travel Plans should be required for all development ove 10 homes and financial contributions sought.	We are looking to introduce a contribution towards health provision but ultimately we can't require such facilities to be built only secure land and/or contributions. Traffic modelling will be provided. The travel plan threshold is considered appropriate and further justification will be provided.	No	
LPR044g	Healthy Communities	Vanessa			Section			5. Healthy communities	Object	Social determinants of good health, Health New Towns and Health in all policies must be built in at the outset as the basis of good development, not an afterthought. We welcome policies to limit takeaways and gambling premises in deprived areas.	Healthy New Towns principles should be reflected throughout. Support for restriction on hot food takeaways and gambling premesis.	Support for limits on hot food takeaways noted. Heathy new town principles are relected as widely as possible and HIA requirement hopefully shows it's not an afterthought.	No	
LPR076b	Healthy Communities	Ruairi Feakes	Durham Policy and Crime Commissioners Office		Section			5. Healthy communities	Support	4. Vulnerability, Community Cohesion and Safer Neighbourhoods The PCC welcomes recognition of inclusive growth and healthy communities within the Draft Local Plan. However, it is important that policies fully consider: • The concentration of vulnerability in certain areas. • The link between poor design, deprivation, and crime. • The importance of accessible community facilities that support early intervention and prevention. The PCC encourages planning policies that: • Promote mixed and balanced communities. • Avoid over concentration of high risk or vulnerable uses in single locations. • Support partnership working with local authorities, health services, and voluntary sector organisations to reduce harm.	Generally supportive of approach	Support noted.	No	
LPR076c	Healthy Communities	Ruairi Feakes	Durham Policy and Crime Commissioners Office		Section			5. Healthy communities	Support	5. Alignment with Violence Reduction and Prevention Priorities The PCC's Police, Crime and Justice Plan Plan prioritises prevention, early intervention, and reduction of violence and antisocial behaviour. The Local Plan can play a critical role in supporting these objectives by: • Ensuring safe environments for children and young people. • Supporting access to green space, education, employment, and leisure opportunities. • Considering the safety implications of licensed premises and late night uses. The PCC welcomes continued collaboration to ensure spatial planning aligns with regional and local safety strategies.	Support for creation of safe and acessible spaces.	Support noted.	No	
LPR051e	Healthy Communities	Chris Martin	HBF		Policy		HC1 - Healthy Communities		Neutral	It is noted that Policy HC1 seeks to roll forward the requirement for schemes of 150 or more homes to submit a Health Impact Assessment (HIA) as part of the planning application. The HBF notes that whilst HIAs are not a national mandatory requirement, the Planning Practice Guidance (PPG) outlines that they can be a useful tool where the health impacts of a development are anticipated to be 'significant' (Reference ID:53-005-20190722). Given that this requirement has been in place for a number of years through the current adopted Local Plan, the HBF would anticipate that to justify its inclusion in the Local Plan Review, the Council will need to evaluate the effectiveness of the policy, establish whether the 150 dwelling threshold is appropriate, and whether it is the case that all schemes of this size have potential 'significant' effects on health.	Seeking justification of how effective HIA's have been in the adopted local plan and is the 150 dwellings threshold still appropriate.	HIA's have been effective and it's more the challenge to think about health impacts throughout the development of a proposal rather than necesserily the final report that is of particular value.	No. Justification to be provided.	

LPR087p	Healthy Communities	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy HC1 - Health and Wellbeing (strategic policy)		Object	It is acknowledged that draft Policy HC 1 duplicates the adopted Policy DC 3, subject to minor amendments relating to the reference of allocated sites within the Plan under Policy H 2. Our Client broadly supports the principles underpinning Policy HC 1, and agrees with the Council that development should seek to enhance health and wellbeing across Darlington. That said, it is noted that the Council proposes to retain the threshold at which developments are required to undertake a Health Impact Assessment ("HIA"). Planning Practice Guidance at Paragraph: 005 Reference ID:53-005-20190722 notes that a HIA is a useful tool to use where there are expected to be significant impacts; however, our Client wishes to emphasise that this does not equate to a HIA being a national requirement. Under these circumstances, and having regard to the substantial legislative changes that have occurred since the adoption of the DBLP, our Client requests that the Council reviews the 150 dwelling threshold to ensure that is remains consistent, appropriate and justified. No evidence, beyond that which supported the DBLP has been provided to demonstrate that a threshold of 150 dwellings should be retained. Our Client also questions whether all developments of this size constitute a 'significant' impact on health, as described by Planning Practice Guidance.	Seeking justification of how effective HIA's have been in the adopted local plan and is the 150 dwellings threshold still appropriate.	HIA's have been effective and it's more the challenge to think about health impacts throughout the development of a proposal rather than necesserily the final report that is of particular value.	No. Justification to be provided.	
LPR104i	Healthy Communities	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621224	Policy		Policy HC1: Health and Wellbeing (Strategic Policy)		Object	9.1 Taylor Wimpey supports the principles of Policy HC1, however the approach towards health and wellbeing needs to be robustly justified by up to date evidence. Justification 9.2 Taylor Wimpey generally supports ambitions to improve health and well-being. The suggested approach is to require Health Impact Assessments developments over 150 dwellings. 9.3 However, in preparing its Local Plan, Taylor Wimpey consider that health implications should be assessed through the Sustainability Appraisal. This approach would assess the cumulative impacts of policies and sites and reasonable alternatives, whilst ensuring that the Local Plan delivers the economic and housing growth required. Proposed Approach 9.4 To address the comments, the following approach is proposed: • Address the health implications through an updated Sustainability Appraisal • Remove the requirements for a Health Impact Assessment from policy.	Seeking justification of how effective HIA's have been in the adopted local plan and is the 150 dwellings threshold still appropriate. Health implications should be considered through the Sustainability Appraisal process.	HIA's have been effective and it's more the challenge to think about health impacts throughout the development of a proposal rather than necesserily the final report that is of particular value. A sustainability appraisal is not considered the appropriate way to consider helth impacts of a development.	No. Justification to be provided.	
LPR105i	Healthy Communities	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621226	Policy		HC1 - Health and Wellbeing (Strategic Policy)		Object	Taylor Wimpey supports the principles of Policy HC1, however the approach towards health and wellbeing needs to be robustly justified by up to date evidence. Taylor Wimpey generally supports ambitions to improve health and well-being. The suggested approach is to require Health Impact Assessments developments over 150 dwellings. 9.3 However, in preparing its Local Plan, Taylor Wimpey consider that health implications should be assessed through the Sustainability Appraisal. This approach would assess the cumulative impacts of policies and sites and reasonable alternatives, whilst ensuring that the Local Plan delivers the economic and housing growth required. To address the comments, the following approach is proposed: • Address the health implications through an updated Sustainability Appraisal • Remove the requirements for a Health Impact Assessment from policy.	Seeking justification of how effective HIA's have been in the adopted local plan and is the 150 dwellings threshold still appropriate.	HIA's have been effective and it's more the challenge to think about health impacts throughout the development of a proposal rather than necesserily the final report that is of particular value.	No. Justification to be provided.	
LPR117	Healthy Communities	James Beackon	NHS Property Services		Policy		HC1 - Health and Wellbeing (strategic)		Support	Draft Policy HC 1 sets out the Council's commitment to making sure that new developments promote healthier lives and help reduce health inequalities through the built and natural environment. NHSPS welcome the inclusion of a standalone health policy that supports healthy lives. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the promoting healthy and safe communities. In accordance with the NPPF, these requirements should be based on identified needs in the joint strategic needs assessment and support delivery of relevant health strategies, such as the health and wellbeing board's joint local health and wellbeing strategy and the integrated care board's infrastructure plan. On this basis, we welcome/ recommend the inclusion of a comprehensive policy on healthy places in the Local Plan, and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared. Health Impact Assessment The use of health impact assessment is a useful tool to ensure planning applicants and the Local Planning Authority have the right information to make sound planning decisions in promoting healthy and safe communities. NHSPS supports the requirement for residential developments of 150 dwellings or more / major development with potential for significant health impacts to submit a Health Impact Assessment. Further guidance is provided by Public Health England (now the Office for Health Improvement and Disparities) in its 2020 guidance.	General support for the approach and ongoing collaboration.	Support noted.	No	
LPR125&126d	Healthy Communities	Josh White	Natural England		Policy		HC1 - Health and Wellbeing (strategic)		Neutral	This policy acknowledges that Health Impact Assessments (HIAs) are required for developments of 150 or more homes and all other non-residential 'major' development. The Plan does not clearly set out expectations for these assessments to consider nature recovery, LNRS priorities or BNG delivery as part of their evaluation of health outcomes, i.e. linked to access to nature and other environmental benefits (heat, noise, air, flood etc).	Expectations for HIA's to consider Nature Recovery, LNRS priorities and BNG delivery should be linked.	If this detail is required we will look to incorporate into future updates of our HIA guidence rather than Local Plan Policy.	No	

LPR125&126r	Environment	Josh White	Natural England		Policy		HC1 - Health and Wellbeing (Strategic Policy)	Air Pollution and Quality	Neutral	The Plan does not include a specific policy on air pollution and quality. We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic5, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. (See submission for footnotes)	The Plan does not include a specific policy on air pollution and quality. The SA and HRA should consider impacts on natural environment. Impact on designated sites will need further consideration in terms of traffic imapact and air quality.	The SA and HRA will consider these impacts.	No	
LPR071f	Healthy Communities	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy		HC1 - Health and Wellbeing		Neutral	Policy HC1 seeks to roll forward the requirement for schemes of 150 or more homes to submit a Health Impact Assessment (HIA) as part of the planning application. We note that HIAs are not a national mandatory requirement, and the Planning Practice Guidance (PPG) outlines that they can be a useful tool where the health impacts of a development are anticipated to be 'significant' (Reference ID:53-005-20190722). Given that this requirement has been in place for a number of years through the current adopted Local Plan, it is considered that the Council should have evaluated the effectiveness of the policy, establish whether the 150 dwelling threshold is appropriate, and whether it is the case that all schemes of this size have potential 'significant' effects on health. The NPPF makes clear in paragraph 45 that documents submitted with planning applications should be kept to a minimum and that local planning authorities should review information requirements at least every two years. We note that the Council's website states that validation guidance is 'Currently being updated'	Seeking justification of how effective HIA's have been in the adopted local plan and is the 150 dwellings threshold still appropriate.	HIA's have been effective and it's more the challenge to think about health impacts throughout the development of a proposal rather than necesserily the final report that is of particular value.	No.	
LPR029	Healthy Communities	David Phillips	Butterfly Conservation North East		Policy		HC2 - Safeguarding Amenity		Support	Lighting Item 5.2.8/5.2.9/5.2.10 Red/yellow/amber light conditions for bats and other nocturnal wildlife e.g. moths and our own health benefits should be adopted in this plan for new developments particularly Burtree Garden Village, Skerningham Garden Village and Coniscliffe Park developments that border the countryside. Blue and White lighting should not be permitted. Item 5.2.10. The provision of dark corridors within this plan for nocturnal wildlife is very welcome.	Supports additional wording around artificial lighting and the provision of dark corridors for nocturnal wildlife. Highlights the importance of red/yellow/amber light conditions for nocturnal wildlife and residents compared to blue and white lighting.	Support noted	No	

This document was classified as: OFFICIAL

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LPR051f	Housing	Chris Martin	HBF		Policy		H1 - Housing Requirement		Object	The Local Plan Review proposes to amend Policy H1 so that the Borough's housing requirement algns with the minimum Local Housing Need (LHN) figure calculated using the Government's current Standard Method. This is 446 dwellings per annum (a net requirement of 7,582 dwellings over the plan period). This represents a decrease from the minimum figure in the adopted Local Plan which is 492 dwellings per annum (a net requirement of 9,840 dwellings over its plan pe-riod). 29. The Government's intention in the NPPF has remained consistent between both the adopted Lo-cal Plan and the emerging Local Plan Review, that is that local planning authorities should 'sig-nificantly boost' the supply of new homes (paragraph 61). It is acknowledged by the HBF that the Council sought an ambitious figure for its adopted Local Plan which went significantly be-yond what was its LHN at the time, nevertheless the HBF is disappointed that this ambition does not appear to be carried through to the proposed Local Plan Review, which instead seeks to re-quire the absolute minimum LHN. The HBF considers that a plan which purposely proposes a lower housing requirement than its recent predecessor cannot be considered positively prepared and runs counter to the Government's instructions to boost housebuilding. 30. The accompanying text to the policy states that: "The NPPF and practice guidance explains that the housing requirement in a Local Plan may be higher than the identified housing need, for example to reflect economic growth aspirations. Darlington is an ambitious authority with regards to economic growth, however when looking at past delivery rates it is considered appropriate and realistic to utilise the 446 figure as the housing requirement…." 31. The Council's justification in this instance appears to mix up the need to provide a suitable bal-ance between jobs growth and new homes with past trends in housing delivery; these are two separate metrics entirely, with past delivery not an indicator as to whether there is a sustainable balance between jobs and homes. 32. In fact, the Council's economic growth aspirations remain ambitious and so it is inappropriate to then only plan for the minimum LHN, as to do so will lead to unsustainable patterns of develop-ment. The Council should therefore seek an appropriate uplift to the minimum LHN so that its housing growth better reflects its economic aspirations. 33.	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. This does not accord with Government ambitions to sigificantly boost housing delivery or the Council's economic ambitions. An uplift should be applied to the minimum local housing need figure to better reflect economic growth aspirations. Past delivery should not be a justification for using the minimum local housing need figure.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum
LPR032	Housing	Richard Cowen	CPRE Durham		Policy		H1 – Housing Requirement (strategic)		Object	As we have previously mentioned in relation to Policy SD2, we believe that the amount of development permitted in the current Local Plan is excessive but we accept that it has been permitted. But we believe that this is important when considering allocations, as proposed under Policy H1. While some development within the urban area may be acceptable as windfall sites become available, we represent that development beyond areas already allocated or committed is unnecessary, especially the provision in respect of Service Villages (Middleton St George, Heighington and Hurworth). These villages have already been extended beyond what is reasonable. In our response to Policy SD2, we accepted that development which served a local need may be acceptable. But Policy H1 states that housing development in such villages will be supported where there is not a demonstrable 5 year supply. This could undermine the "local" commitment mentioned in Policy SD2 in villages which have already seen excessive development. We fully support the restrictive content of Policy SD2 and represent that this should not be undermined in this way in Policy H1.	The amount of development permitted in the current Local Plan is excess but accepted that it is permitted. Concern with the wording in policy H1 around supporting housing sites well related to the built form of the service villages when the Council cannot demonstrate a five year housing land supply. This could undermine the criteria in policy SD2 that development in the villages should meet local needs.	The windfall mechanism in policy H1, which allows appropriate sites to come forward if the Council cannot demonstrate a 5 year housing land supply, was considered sound through the examination of the current Local Plan. It is therefore proposed to be retained.	No	
LPR041a	Housing	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy		H1 – Housing Requirement (strategic)		Object	Rural Villages should be included as a location where planning permission may be granted where there is no longer a demonstrable supply of sites to fully meet the five year requirement. Paragraph 3 of the policy should be amended to state; "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 make both a positive contribution to the five year supply of housing land and be well related to the development of the main urban area, service villages or rural villages (as defined in Policy SH1 will be supported….". In support of the above a planning application at Neasham Nursery, Neasham, a site outside development limits, was approved in 2016 in circumstances when there was not a five year supply. The site proved attractive to the market, was acquired by a small local builder and the site was delivered in full within two – three years. Benefits included the prompt delivery of completions, a positive contribution to the range and choice of dwellings in the Borough, and occupants of the development supporting existing services in Neasham which include The Fox & Hounds Pub and Restaurant and the Village Hall in which clubs meet and events held both in the Hall and on the associated Village Green.	Rural Villages should be included as a location where planning permission may be granted where there is no longer a demonstrable supply of sites to fully meet the five year requirement.	The windfall mechanism in policy H1, which allows appropriate sites to come forward if the Council cannot demonstrate a 5 year housing land supply, was considered sound through the examination of the current Local Plan. It is therefore proposed to be retained as written. Rural villages are considered to be less sustainable settlements and therefore this part of the policy refers only to the main urban area and service villages.	No	
LPR044a	Housing	Vanessa			Policy		H1 – Housing Requirement (strategic)		Object	Housing Need Numbers This plan is unsustainable, vastly over-providing for local housing need. Changes to housing need figures show this plan are based on deliverability not local need. We urge the government to allow Local Planning Authorities (LPAs) to set their own housing needs, which must identify & meet local housing number & type requirements. Over-allocation of greenfield sites reduces the ability to force developers to develop brownfield sites, leaving the council to deal with these, and a "doughnut of deprivation" around the town centre. If not removed, outer sites must have timings set before applications will not be considered. Large sites are a risk for mortgage lender over-exposure, reducing competitive lender offers, hence build rate. Set policy that these must be subdivided to cut risk.	Concern that the plan is over providing for local housing need. The government should allow Local Planning Authorities to set their own housing needs. Concern with the over allocation of greenfield sites and negative impacts on the town centre.	The Council has followed national planning practice guidance in assessing local housing need. A Local Housing Needs Assessment will be published at the next stage of plan preparation. The majority of the housing allocations have been included from the current Local Plan which were found to be sound at examination. A large proportion are greenfield sites as housing allocations need to be deliverable/developable. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable and Local Plans have failed in the past where they have been relied upon. There are some brownfield sites in the draft plan and the Council is still supportive of other brownfield sites coming forward for development providing they are in a suitable location. Allocations have been put forward which are considered to be the most suitable and sustainable for housing development. Site selection has been informed by detailed site assessments within the HELAA and SA.	No	
LPR053	Housing	Patricia Meredith	Resident		Section		H1 – Housing Requirement (strategic)	6. Housing	Object	Housing Need & Distribution: The Plan significantly over provides housing relative to local need. Current figures reflect deliverability rather than genuine need. Unfortunately Council Tax Farming comes to mind in this scenario. Over allocation of greenfield sites undermines brownfield regeneration. Large sites should be subdivided to reduce lender exposure and improve build out rates. Windfall averages should be deducted from housing need. Smaller homes and bungalows are required to meet the needs of an ageing population and reduce under occupation.	The plan over provides housing relative to local need. Other concerns raised include; over allocation of greenfield sites, windfall averages should be deducted from need, smaller homes and bungalows are required to meet the needs of an ageing population.	The Council has followed national planning practice guidance in assessing local housing need. A Local Housing Needs Assessment will be published at the next stage of plan preparation. The majority of the housing allocations have been included from the current Local Plan which were found to be sound at examination. A large proportion are greenfield sites as housing allocations need to be deliverable/developable. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable and Local Plans have failed in the past where they have been relied upon. There are some brownfield sites in the draft plan and the Council is still supportive of other brownfield sites coming forward for development providing they are in a suitable location. Allocations have been put forward which are considered to be the most suitable and sustainable for housing development. Site selection has been informed by detailed site assessments within the HELAA and SA. A small sites windfall allowance is factored into the housing trajectory. An appropriate housing mix is encouraged on sites via policy H3 (Housing Mix). Requirements in the policy for M4(2) and M4(3) standards also assist in meeting the housing needs of older persons and those with disabilties.	No.	
LPR059 & 60c	Housing	Dominic Crowley	Lichfields		Policy		H1 – Housing Requirement (strategic)		Object	It is acknowledged that the Council are reducing their minimum housing requirement from 492 dwellings per annum (dpa) to 446dpa (net) over the revised Plan period from 2025 to 2042, meaning a revised total net minimum requirement of 7,583 over the new Plan period, compared with 9,840 dwellings under the current Local Plan. Hallam Land acknowledge that Darlington is in a relatively unique position relative to other authorities in the North East in respect of housing need, given that the new Standard Method requirement for Darlington is lower than their current Local Plan figure (but still significantly higher than the previous Standard Method requirement of 152dpa). We believe this is testament to the Council taking an ambitious approach to economic growth and establishing housing need in their currently adopted Local Plan. See submission.	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. This does not accord with the Council's economic ambitions. Past delivery should not be a justification for using the minimum local housing need figure. The messaging and justification between policy H1 and H2 is inconsistent. Proposing a minimum housing requirement figure but identifying substantial housing land in excess of the overall need. Concern raised within the fall back position in policy H1 when the Council cannot demonstrate a five year housing land supply. The reaction to maintain a five year supply should not kick in when a five year supply is no longer demonstrable, but before to prevent such a shortfall happening.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19). The windfall mechanism in policy H1, which allows appropriate sites to come forward if the Council cannot demonstrate a 5 year housing land supply, was considered sound through the examination of the current Local Plan. It is therefore proposed to be retained as written.	Yes	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum

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LPR064 & 065e	Housing	Nick Pleasant	Stantec on behalf of Vistry		Policy		H1 – Housing Requirement (strategic)		Object	Vistry strongly objects policy H1. The reduction in the minimum annual housing requirement from 492 to 446 dwellings up to 2042 within the Draft Plan, is unsound and not appropriate when it is known: i. The Council can deliver against a higher target (as proven in the adopted plan). ii. The Council is pursuing additional levels of economic growth. iii. There is a clear requirement for additional housing locally and nationally. 3.10.2 This change results in an overall reduction in the minimum net housing requirement from 9,840 dwellings up to 2036 to 7,582 dwellings by 2042 within the Borough. 3.10.3 There is no evidential basis to justify a reduction in the housing requirement from the established requirement within the adopted Local Plan. There has been no new demographic, market or economic evidence published alongside the Draft Plan which demonstrates that the previously identified level of housing need is no longer appropriate. In the absence of robust evidence being provided by DBC Vistry can only conclude that the decision to reduce the housing requirement is arbitrary and fails the soundness test of being justified by proportionate and robust evidence. 3.10.4 The Standard Method for assessing housing need is intended to be a minimum starting point and should not be a cap on ambition. Planning Practice Guidance is clear that local planning authorities should consider whether an uplift is justified where this would support economic growth strategies or address unmet need. The adopted Local Plan appropriately applied this principle by planning positively for growth. The Draft Plan in contrast, retreats from this approach without providing explanation as to why Darlington's economic ambitions no longer justify a higher level of housing provision. 3.10.5 DBC originally uplifted the housing requirement in the adopted Plan above the Standard Method applicable at the time, in order to satisfy locally identified housing needs and stimulate economic and population growth within the Borough. However, the proposed reduction represents a simple reversion to the revised standard method figures published in December 2024, without sufficient, or any identifiable justification for abandoning the adopted growth strategy. 3.10.6 The adopted Plan demonstrated a commendable level of ambition. DBC sought to proactively plan for growth and positively shape the borough's future. Vistry considers this strategy to remain sound and sees no compelling justification for retreating from this position. 3.10.7 Vistry is sceptical that DBC can demonstrate a deliverable five-year housing land supply with the appropriate buffers applied. This concern is reinforced by the continued absence of delivery of a number of major allocated sites,	Vistry strongly objects policy H1. The reduction in the minimum annual housing requirement from 492 to 446 dwellings, is unsound and not appropriate when it is known that the Council can deliver against a higher target, the Council is pursuing additional levels of economic growth and there is a clear requirement for additional housing locally and nationally. The standard method provides a starting point and an uplift should be applied to support economic growth as previously done in the adopted Local Plan. Concerns raised that a five year housing land supply cannot be demonstrated. As a minimum the adopted housing requirement should be retained. Support for the retention of the fall back position in policy H1 when a five year supply cannot be demonstrated which provides flexibility.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR067 & 68d	Housing	Georgina Cox	Gladman		Policy		H1 – Housing Requirement (strategic)		Object	See submitted attachment. The Draft Local Plan Review proposes to amend Policy H1 so that the borough's housing requirement aligns with the Local Housing Need Figure. The Local Plan Review is therefore proposing a delivery of 446 dwellings per annum with a net housing requirement of 7,582 dwellings over the plan period. This is a decrease from the adopted Local plan which had a housing requirement of 492 dwellings per annum with a net housing requirement of 9,840 dwellings over the plan period. Gladman does not consider the Government's intentions in the NPPF are demonstrated by the council in the Draft Local Plan Review document. We are in a national housing crisis and councils should be aiming to 'significantly boost' the supply of new homes which is stated in paragraph 61 of the NPPF. Darlington Borough Council has not properly sought residential opportunities for growth in the administrative area due to the minimum target being derived from using the standard method decreasing from the adopted requirement. The adopted requirement was economic led and there is no updated evidence to suggest that this should not continue to be the case nor that the council cannot deliver homes in excess of the standard method, and for this reason Gladman would consider the housing requirement should be increased in the Draft Local Plan Review document to one that at least builds on the adopted plan's housing requirement in light of the national housing crisis. The only analysis Gladman can find for establishing the housing requirement is set out in Paragraph 6.1.3 of the consultation document. This is not sufficient and requires greater scrutiny and justification ahead of the Regulation 19 version of the plan. It is important to note that external factors have limited completions since the adoption of the Local Plan in 2022, factors such as nutrient neutrality which now have a resolution and completions are expected to stabilise at more than 600 dwellings per annum for the next 9 years, significantly above the proposed housing requirement. It is clear that when supply is made available i.e additional allocated sites there is demand in the market. Simultaneously, Darlington Borough Council's economic growth aspirations remain ambitious and so the strategy to only plan for the minimum Local Housing Need figure is unsustainable to support this level of economic growth.	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. This does not accord with Government ambitions to sigificantly boost housing delivery. The adopted requirement was economic led and there is no updated evidence to suggest this should not continue. The housing requirement should be increased. The justification in para 6.1.3 of the draft plan is not sufficient.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR071g	Housing	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy		H1 – Housing Requirement (strategic)		Object	Our client supports the Council's ambitious economic growth aspirations. The NPPF and practice guidance explains that the housing requirement in a Local Plan may be higher than the identified housing need, for example to reflect economic growth aspirations. The Local Plan Review proposes to amend Policy H1 so that the Borough's housing requirement aligns with the minimum Local Housing Need ('LHN') figure calculated using the Government's current Standard Method. This is 446 dwellings per annum (a net requirement of 7,582 dwellings over the plan period). This represents a decrease from the minimum figure in the adopted Local Plan which is 492 dwellings per annum (a net requirement of 9,840 dwellings over its plan period).We also note that the Council's latest Annual Monitoring Report (AMR, 2024) demonstrates that in the majority of recent years, the Council has delivered more homes than its minimum LNH of 446 dwellings per annum, with an average delivery in the last five years of 489 dwellings. Whilst the 2023/24 figure is lower, the AMR explains that this is a result of the requirements of nutrient neutrality which has prevented the granting of planning permission on some residential sites. Given the provisions in the Levelling Up and Re-generation Act (2023) seek to resolve the issue of nutrient neutrality by 2030 at the latest, it is anticipated that lower completions figures will be temporary in nature. Even including the 2023/24 figure, the average of 489 per annum is very close to the 492 dwellings per annum of the current adopted Local Plan figure. There is therefore an opportunity to continue to deliver new homes in excess of the LNH, and justified reason to reduce the minimum requirement. Given the Council's housing delivery figures, and the NPPF's requirement to significantly boost the supply of homes, we would encourage the Council to maintain, as minimum the figure in the adopted Local Plan, and not proposed a decrease to the housing requirement.	Given the Council's housing delivery figures, and the NPPF's requirement to significantly boost the supply of homes, we would encourage the Council to maintain, as minimum the housing requirement figure in the adopted Local Plan, and not propose a decrease to 446 dwellings per annum. The housing requirment may be higher than the identified housing need, for example to reflect economic growth aspirations. The Council's latest Annual Monitoring Report (2024) also demonstrates that in majority of recent years delivery has been above the LHN figure of 446 dwellings per annum.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR087k	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		H1 - Housing Requirement		Object	It is acknowledged that, through the Local Plan Review, the Council proposes to amend Policy H 1 and reduce the Borough's housing requirement is proposed to align with the Minimum Local Housing Need (LHN) Figure calculated using the Government's 2024 published Standard Method. This revised figure represents a net reduction of 46 dwellings per annum, equating to a decrease of 9.35%. To be clear, our client is broadly in support of the Local Plan Review, however would like to raise some concerns/limitations with the reduction in LHN figure. Since forming Government in 2024, the Labour Party has announced a series of planning reforms intended to accelerate housing delivery and facilitate the provision of 1.5 million homes over the course of the parliamentary term. In this context, our Client wishes to remind the Council that increasing the supply of homes across England remains a stated Government objective. This emphasis is reflected at paragraph 61 of the NPPF, whereby it is important that a sufficient amount and variety of land is brought forward where it is needed and to significantly boost the supply of new homes. Paragraph 62 of the NPPF, alongside guidance published within the Planning Practice Guidance sets that strategic policies should be informed by a Local Housing Needs Assessment (LHNA), conducted using the standard method. Paragraph: 002 Reference ID: 2a-002-20241212 of Planning Practice Guidance sets out that standard method sets out a minimum annual housing need figure, and later notes that the housing needs figure generated using the standard method may change as the inputs, including housing stock and affordability ratio, are variable (Paragraph: 008 Reference ID: 2a-008-20241212 & Paragraph: 009 Reference ID: 2a-009-20241212). Our client would note that Standard Method is therefore fluid, depending on affordability ratios and stock based methodology both of which are updated annually. As such, planning for the minimum does not account for flux in the Standard Method. Furthermore, national policy provides a mechanism for Local Planning Authorities to adopted a housing requirement above the standard method, recognising that housing need can fluctuate over time. Our Client acknowledges that the Council is aware of this position, and commends the previous ambitious approach taken by the Council in the adopted DBLP, whereby the housing requirement went significantly beyond the LHN at the time. However, it is unclear why the Local Plan Review, which now proposes to plan solely for the minimum LHN derived from the standard method, has not sought to be equally ambitious. It is understood that the Council has provided the following justification (paragraph 6.1.3) in regard to the above points "Darlington is an ambitious authority with regards to economic growth, however when looking at past delivery rates it is considered appropriate and realistic to utilise the 446 figure as the housing	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. Consideration should be given to the governments objective to significantly boost the supply of new homes. The local housing need figure should align with the Council's ambitions for economic growth. Concerns with justification of using past delivery. Previous delivery exceeds the LHN figure in most years showing there is demand for residential development in Darlington. The Council should increase/retain its existing housing requirement in order to accont for potential shortfalls in delivery of the plan period.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR092h	Housing	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		H1- Housing Requirement		Object	Miller Homes are disappointed that the Council has chosen to reduce the housing requirement to align with the Local Housing Need (LHN) figure calculated using the current standard method. The Draft Local Plan Review proposes a housing requirement of 446 dwellings per annual while the current adopted requirement is 492 dwellings per annum. In terms of past delivery, the last Annual Monitoring Report (AMR) shows that with the exception of 23/24, the Council has delivered in excess of 500 dwellings per annum since 2018/19. As a result, there is clearly capacity in the market and evidence that the Council can deliver new homes at a rate significantly higher than the LHN. Planning Practice Guidance (PPG) states (Paragraph: 040 Reference ID: 2a-040-20241212): "The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination". The adopted housing requirement in the current Darlington Local Plan included an uplift to support economic growth. The Inspector concluded in his report on the current local plan at paragraph 40: "The target of 492 net additional homes per year also allows for increased net in-migration (70 households a year). This would allow the working age population to be sufficient to meet demand for 7,000 net additional jobs in the Borough, based on reasonable assumptions about commuting patterns, unemployment and economic activity rates. The target therefore is consistent with the economic aspirations of the Plan which, for the reasons set out under the following main issue, are justified. Whilst there is no certainty that more people will move to the Borough if the jobs are created, planning to provide the necessary number of homes represents a positive approach". Darlington's economic growth ambitions remain the same in the Draft Local Plan Review where paragraph 1.8.3 states: "In order to create Economic Growth through further employment options, sites have to be available and have to be able to be flexibly used for different ranges of sectors and commercial development. Opportunities for further investment in Darlington will be accommodated through a diverse portfolio of sites and locations. Our ambition to achieve 6,400 net additional jobs over the 16-year plan requires suitable locations to grow the economy, which are identified through the Local Plan 2025-2042 2016-2036. This equates to 400 jobs per annum which is above the 350 jobs per annum calculated in the Employment Land Needs Report (2017) which informed the current adopted Local Plan (2016-2036)"	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. Past delivery shows that the Council can deliver new homes at a rate higher than the LHN. The local housing need figure should align with the Council's ambitions for economic growth. An economic growth uplift was previously applied and found sound. Economic aspirations have not changed and as such it is inappropriate to plan for the minimum LHN. This would lead to unsustainable patterns of commuting. The Council should consider increasing the housing requirement to help meet affordable housing needs. Concerns that the Council cannot demonstrate a five year housing land supply in the draft plan given that there is a reliance on sites without planning perission and no evidence provided to support their deliverability. Further sites should be inlcuded to ensure the housing requirement is met, including Miller's site at Middleton St George which is suitable, available and achievable. Support for the retention of the windfall mechanism to bring appropriate sites forward if the Council are unable to demonstrate a 5 year housing land supply.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19). The Council considers that it can demonstrate a five year housing land supply in the draft Local Plan and there is sufficient evidence to support the deliverability of those sites without planning permission. Further evidence will be published at the next stage of plan preparation.	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.

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LPR095c	Housing	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Hayfofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Policy		H1 - Housing Requirement (strategic)		Neutral	Draft Policy H1 is considered to be in accordance with the National Planning Policy Framework and largely retains the wording of the currently adopted Policy from the DLP, with an updated consideration of the new Standard Method, published in December 2024. We do not take issue with the proposed annual housing delivery targets as a result of the new Standard Method, and the expected housing delivery. It is noted that the referenced housing trajectory (Appendix A of the DLP) indicates that Site 468 (Kendrew Street Car Parks Regeneration Area) will deliver over 5 years, at an estimated yield of 30 dwellings per annum (dpa) from 2031/32.	H1 is considered to be in accordance with the NPPF. It largely retains the wording of the currently adopted policy, with an updated consideration of the new standard method. No issues with the proposed annual housing delivery targets and the expected housing delivery.	Comments and support noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR102a	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy		H1 - Housing Requirement		Object	In adopting the current Local Plan, the Council included an uplift to the standard method for calculating housing need, which reflected the Council's economic growth ambitions, noting that the Council was committed to supporting the economic growth of the Borough, with the authority being active in attracting new businesses and industries to the area. This resulted in a need for 492 dwellings per annum. This is largely consistent with the current Standard Method for calculating housing needs, which totals 446 dwellings per annum. This is before any uplift is added to support economic growth. In justifying the approach of supporting economic growth through increased housing numbers, the current Local Plan noted that, "The relationship between housing and economic growth also works in the other direction. If we do not deliver sufficient housing, of the right type and in the right areas, there is a risk that the working age population seek new homes in neighbouring authorities. Failure to plan for the homes we need could lead to detrimental economic and social impacts on the Borough."In finding the current Local Plan sound, the examining Planning Inspector's final report made the following comments on the increased housing need figure of 492 dwellings, "40.The target of 492 net additional homes per year also allows for increased net in-migration (70 households a year). This would allow the working age population to be sufficient to meet demand for 7,000 net additional jobs in the Borough, based on reasonable assumptions about commuting patterns, unemployment and economic activity rates. The target therefore is consistent with the economic aspirations of the Plan which, for the reasons set out under the following main issue, are justified. Whilst there is no certainty that more people will move to the Borough if the jobs are created, planning to provide the necessary number of homes represents a positive approach." The economic ambitions for the authority evidently remain, with the following sections being included in the draft Local Plan Review: "1.2.6The Borough's economy has performed strongly over recent years shifting from its past reliance on manufacturing to one with a wider, more resilient base. On the ground this can be seen with the opening of a number of Storage and	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. The Council's current housing requirement included an uplift to reflect economic growth ambitions and was found sound at examination. Economic aspirations have not changed and as such it is inappropriate to plan for the minimum LHN. An uplift to the housing requirement should be applied which would be consistent with national policy and seeking to increase housing delivery. Concerns that the Council cannot demonstrate a 5 year housing land supply in the draft plan. Concerns raised that no housing allocations are proposed in Hurworth (service village) and with the mix of sites put forward. There is a reliance on large scale allocations. Site put forward at Neasham Road, Hurworth is the best / most sustainable of all the sites that have been considered in and around Hurworth.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19). The Council considers that it can demonstrate a five year housing land supply in the draft Local Plan and there is sufficient evidence to support the deliverability of those sites without planning permission. Further evidence will be published at the next stage of plan preparation. The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking.	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR103e	Housing	Duncan Peake	Raby Estates	Hanna Mawson, Pegasus Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne, NE1 6AE	Policy		H1 - Housing Requirement		Object	The adopted Darlington Local Plan proposes a housing requirement of 446 dwellings per annum (Policy H1 Housing Requirement). This is a reduction from the previously adopted figure of 492 dwellings per annum. On the basis that there is a national housing crisis and the NPPF is clear at paragraph 61 that local planning authorities should 'significantly boost' the supply of new homes, the proposed figure is clearly not in the spirit of Government policy and should be revised accordingly. When comparing the proposed dwelling annual requirement of 446 to the latest Local Housing Need figure predicted by Pegasus Group based on the Standard Method (which takes into account 2025 stock levels and 2025 affordability ratios), the proposed dwelling requirement is some 9 dwellings short (453 dwellings per annum). As demonstrated in the figures, affordability has worsened in Darlington, as set out in the affordability ratio data, and the housing stock has grown in which case adopting a higher dwelling requirement would help provide headroom for the arising needs as they evolve over time. Notwithstanding this, in terms of housing land supply, against the 446 that results in a dwelling requirement overall of 7,582 over 17 years to 2042, Table 6.2 of the Draft Local Plan identifies that there is land for 9,456 homes made up of allocations and existing commitments to meet the future dwelling requirement. Some of the strategic allocations will continue to deliver beyond the plan period. Whilst this approach of having an excess of supply against the requirement is welcomed, there is concern that all needs in the Borough may not be provided for due to the approach of the Spatial Strategy which do not adequately provide for the rural areas and, therefore, it is recommended that amendments are made to the Plan to ensure it meets the soundness tests as explained below (see submission)	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum in line with Government's current standard method. This does not align with government policy and significantly boosting the supply of new homes. Based on 2025 stock levels and affordability ratio data the standard method figure should be 453 dwellings per annum. Having an excess of housing land supply against the housing requirement is supported. However there are concerns that the housing needs of rural areas are not met due to the spatial strategy.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19). The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking.	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR104j	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621225	Policy		Policy H1: Housing Requirement (Strategic Policy)		Object	10.1 Taylor Wimpey acknowledges that the Council proposes to utilise the standard method Local Housing Need (LHN) figure of 446 dwellings per annum. In accordance with the 2024 National Planning Policy Framework, this figure should be treated as the minimum starting point for establishing the housing requirement. 10.2 Since the release of the latest Affordability Ratios this figure has risen from 446 dwellings per annum to 449 dwellings per annum and this should be reflected in the document if the LHN standard method figure is to be used. 10.3 Taylor Wimpey are concerned that the Local Plan Review has not been informed by an updated assessment of housing need. The Council's most recent evidence relating to the Darlington Strategic Housing Market dates from 2020 and is no longer reflective of current national policy, guidance or market conditions, and therefore requires updating. 10.4 While Taylor Wimpey supports the inclusion of flexibility within the housing supply, it is considered that the minimum housing requirement should be sufficiently ambitious to reflect the Council's employment growth objectives. An appropriate uplift above the standard method should be applied to support economic growth and to assist in addressing the significant and well-evidenced need for affordable housing, consistent with national policy. 10.5 Taylor Wimpey has concerns regarding the housing land supply proposed within the Local Plan. In particular, it is considered that the assumptions underpinning the delivery rates of sites are overly optimistic and do not adequately reflect realistic market conditions and lead-in times for development. These assumptions should therefore be revisited to ensure a more robust and credible approach to housing delivery over the plan period. 10.6 Taylor Wimpey notes that the Council identifies a fallback position within Policy H1 where the five-year housing land supply position is not met. However, this approach is considered insufficient and risks constraining the delivery of additional housing opportunities. In particular, it is inconsistent with Policy SD3 and does not provide the level of flexibility required by the 2024 National Planning Policy Framework to ensure that housing needs are met, development is responsive to changing circumstances, and the Plan remains effective and deliverable over time. Justification 10.1 National policy is clear that, in order to support the Government's objective of signifcantly boosting the supply of homes, Local Plans must ensure that a sufficient amount and variety of land is brought forward in the right locations, that the needs of different groups within the community are addressed, and that land with planning permission is developed without unnecessary delay. The overarching objective is to meet an area's identified housing needs, including through the delivery of an appropriate mix of housing types to meet local requirements. 10.2 The 2024 Framework confirms that the standard method provides the starting point for assessing housing need and	The release of latest affordability ratios means the local housing need figure has risen to 449 dwellings per annum and this should be reflected. Concerns that the Local Plan Review has not been informed by an updated assessment of housing need, employment growth and affordable housing requirements. An uplift should be applied to support economic growth and to assist in the delivery of affordable housing. Currently inconsistent with national policy. Justification based on past delivery rates is not a sound approach and past rates have exceeded the proposed LHN. Concern with the housing land supply and overly optimistic delivery rates/lead in times. The fallback position in policy H1 regarding 5 year housing land supply is not flexible enough. Windfall allowance should be reduced. The housing requirement should be increased and Taylor Wimpey's sites at Berrymead Farm and Coniscliffe Road should be identified for allocation as they are available, suitable and achievable.	Comments noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19). The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking. Further evidence on delivery rates will be published at the next stage of plan preparation. The windfall mechanism in policy H1, which allows appropriate sites to come forward if the Council cannot demonstrate a 5 year housing land supply, was considered sound through the examination of the current Local Plan. It is therefore proposed to be retained as written	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR105j	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621227	Policy		H1 - Housing Requirement		Unknown	Taylor Wimpey acknowledges that the Council proposes to utilise the standard method Local Housing Need (LHN) figure of 446 dwellings per annum. In accordance with the 2024 National Planning Policy Framework, this figure should be treated as the minimum starting point for establishing the housing requirement. Detailed response - please see submission. To address the comments, the following approach is proposed: • Support the need for a buffer for flexibility. • Need to update the LHN prior to the next consultation and have regard to the need to rebase the Plan. Need to provide an updated assessment of housing and employment needs to ensure a robust evidence base. • Need to consider an appropriate uplift to the LHN to support economic growth and the significant affordable housing need. • Need to better reflect the role of house building in supporting economic activity. • Need to ensure that housing is delivered across the local authority to ensure that the diverse needs of different communities and groups can be met. • Need to reconsider the assumptions relating to lead-in times for construction and small site windfall rates. • Identify Taylor Wimpey's site at Coniscliffe Road, Darlington for housing purposes.	See above	See above	Yes		See above
LPR110b	Housing	James Seabury	Banks Group		Policy		H1 - Housing Requirement (Strategic)		Object	The Local Plan Review seeks to reduce the Borough's housing requirement from the current requirement in the local plan of 492 dwellings per annum to the standard method figure of 446 dwellings per annum. Following the council justifying the housing requirement set out within the current local plan based on economic growth within the Borough and to support employment aspirations, it is surprising that they are now seeking to supress such housing growth. There appears to be no evidence provided to justify such a reduction in the housing requirement. The council appear to be protecting housing delivery and their five-year housing land supply position which has reduced every year since the local plan was adopted. The council's five-year housing land supply statement from December 2025 states that the council have a 5.4 year housing land supply. This figure includes the delivery of 120 dwellings at Burtree Garden Village and 90 dwellings at Skerningham Garden Village within the five-year period. It is clear that the two Garden Villages are contributing significantly to the council's five-year housing land supply position. It is therefore vitally important that planning applications within the Garden Villages are progressed as soon as practicable to ensure housing delivery as the council envisage. Any further delays to housing delivery at Skerningham will impact on the council's ability to demonstrate a five-year housing land supply. We believe the housing requirement for the council should remain at 492 dwellings per annum as per the requirement within the current adopted local plan.	Concerns raised around the reduction of the housing requirement figure in policy H1 from 492 dwellings per annum to 446 dwellings per annum. The current housing requirement is based on economic growth and supports employment aspirations. It is surprising that the Council are now seeking to supress such housing growth and the housing requirement should remain at 492 dwellings per annum. No evidence to support the reduction and the Council appear to be protecting housing delivery and the 5 year housing land supply position. The two Garden Villages are contributing significantly to the 5 year supply and therefore it is important that planning applications are progressed quickly.	Comments and support noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes		Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.

LPR113 & 114f	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		H1 – Housing Requirement (strategic)		Object	Bellway strongly objects to the decision to reduce the minimum annual housing requirement from 492 to 446 dwellings up to 2042 within the Draft Plan. This change results in an overall reduction in the minimum net housing requirement from 9,840 dwellings up to 2036 to 7,582 dwellings by 2042 within the Borough. Whilst it is acknowledged that DBC originally uplifted the housing requirement in the adopted Plan above the Standard Method applicable at the time, in order to satisfy locally identified housing needs and stimulate economic and population growth within the Borough. However, the proposed reduction represents a simple reversion to the revised standard method figures published in December 2024, without sufficient, or any identifiable justification for abandoning the adopted growth strategy. Bellway supported the approach of the adopted Plan, which demonstrated a commendable level of ambition. DBC sought to proactively plan for growth and positively shape the borough's future. Bellway considers this strategy to remain sound and sees no compelling justification for retreating from this position. Bellway are confident that DBC cannot demonstrate a deliverable five-year housing land supply with the appropriate buffers applied. This concern is reinforced by the continued absence of delivery of a number of major allocated sites, which have remained undeveloped since the plan was adopted in 2016. The ongoing inability to demonstrate a five-year housing land supply, when considered alongside the reduced economic ambitions introduced by the Draft Plan, risks undermining and potentially reversing the positive socio-economic progress that Darlington has experienced in recent years. Within this context Bellway do not believe reducing the housing requirement nine years after adoption is a sustainable or effective response to addressing delivery challenges. Such an approach undermines the level of growth which the adopted plan seeks to achieve. DBC should as a minimum retain the adopted housing requirement in order to provide consistency, address persistent under delivery and ensure the Borough's socio-economic growth ambitions are met. Within the above context Bellway do support the decision to retain a provision within the policy where there is no longer a demonstrable supply of sites to meet the five year housing land requirement, housing sites located beyond development limits that would make a positive contribution to the five-year housing land supply and are well related to the built form of the main urban area or service villages will be support. This provision introduces important flexibility into the wider housing strategy and is acknowledged by Bellway as a proactive measure that builds in contingency within the Draft Plan	Objection to the reduction of the housing requirement from 492 to 446 dwellings per annum. An uplift was applied to the housing requirement in the current plan to satisfy housing needs and to stimulate economic growth. No evidence provided to justify moving away from this approach. It is considered that the Council cannot demonstrate a 5 year housing land supply. Major allocated sites are not coming forward for development. DBC should as a minimum retain the adopted housing requirement in order to provide consistency, address persistent under delivery and ensure the Borough's socio-economic growth ambitions are met. Support for the retention of the windfall mechanism to bring appropriate sites forward if the Council are unable to demonstrate a 5 year housing land supply.	Comments and support noted. After further consideration the Council will apply an uplift to the housing requirement figure to account for jobs growth over the plan period and to better reflect the economic growth aspirations of the authority (increase to 490 net additional dwellings per annum). Further evidence on this will be published in a Local Housing Needs Assessment prior to the next stage of plan preparation (Reg 19).	Yes	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LPR087l	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	20 Great Burdon	H2 - Housing Allocations (strategic policy)		Support	Detailed submission. Please see documents. All comments relate to Site 20	The majority of the site allocation criteria and policy remains as per the adopted Local Plan. This needs to be re-checked against the current iteration of the NPPF (Dec 2024) as well as relevant Planning Practice Guidance. The client's land holding extends approximately 9.6ha additional over and above the 88.3 ha which is allocated. It is highlighted that there is a small parcel of white land to the north west of the allocation and adjacent to the rural gap. It is suggested that the allocation should be extended to include this area. Support that the yield and phasing in policy H2 is indicative. No objection to the retained indicative yield of 1,250 homes. Based on initial investigations the site could potentially deliver bewteen 1,250 - 1,500 dwellings. Reference to a reduction in the housing requirment from 492 dwellings per annum to 446. Increase in reliance placed on allocated sites and importance of these sites to achieve sufficient supply and mix in the context of a reduced housing requirement. Clarification requested on how the Council has calculated that 600 homes will be delivered during the plan period up to 2042 and the 650 homes thereafter. This is a change from the current Local Plan which suggested 500 homes within the plan period and 750 homes thereafter. A planning application is expected to be submitted by Miller Homes in the short term. Upon securing planning permission the developer is looking to commence development as soon as reasonably possible. Concern regarding the removal of the term 'rolling' five year housing land supply within policy H2.	Comments noted. The small parcel of white land adjacent to the rural gap at the north west corner of the site will be incorporated into the allocation. With regards to the difference in delivery mentioned between the Draft Local Plan Review and the current adopted Local Plan, the site has the same lead in time but the draft plan period is longer with 2 additional years of delivery. At an estimated delivery rate of 50 units per annum this explains the increase by 100 units. It was expected that there would also be two house builders on the site. The Council would welcome further discussions on this with Miller to align with their estimates. The word rolling was removed from policy H2 given it no longer featured in the NPPF. The word 'annually' will be inserted so that it is consistent with national policy.	Yes	Amend the site area for allocation 20 Great Burdon to include the white parcel of land to the north west corner of the site and adjacent to the rural gap. Amend the wording in policy H2 to read "The sites will provide a supply of housing land sufficient to annually evidence a deliverable five year housing supply in accordance with the National Planning Policy Framework."
LPR111 & 112j	Housing	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Site	100 Hall Farm, Branksome	H2 - Housing Allocations (strategic policy)		Support	Housing allocation statement provided. See submission.	Site ref 100, Hall Farm - no concerns with the reduction of the site yield from 450 dwellings to 400 dwellings on the basis that it is an indicative figure. Retaining flexibility within the policy is of critcal importance to ensure the most effective and efficient use of the allocation. Site yield may well exceed that indicatively cited in H2. The proposed phasing of the housing delivery has been revised so that now all 400 dwellings will come forward within the Local Plan Review period up to 2042. Support given for these timescales. Barratt David Wilsom Homes are looking to secure a timely planing permission at the site and commence works as soon as possible.	Comments noted.	No.	
LPR029c	Housing	David Phillips	Butterfly Conservation North East		Site	251 Skerningham	H2 - Housing Allocations (strategic policy)		Neutral	The scale of committed development and the number of proposed new dwellings including Skerningham Garden Village is noted. This development on the rural-urban edge will make it more difficult for people to access green spaces and the countryside. Indeed, the continued erosion of green spaces through cumulative development within the borough significantly damages the environment, changes the character and distinctiveness of the landscape and damages residents' quality of life as well as well as significantly increasing pressure on remaining nearby green spaces. This draft plan therefore needs to recognise a requirement for quality green space including wildlife friendly green space to promote health and well-being and reduce health inequalities, particularly where proposed major development will result in the countryside being pushed further away.	Concerns regarding committed and proposed development including Skerningham Garden Village. Negative impacts on the countryside, environment, landscape and quality of life. Development on the rural-urban edge will it make it more difficult for people to access green spaces. Need for quality green spaces.	Comments noted. Housing allocations have been selected to minimise landscape and countryside impacts. A sustainability appraisal has informed this process. A number of sites are also existing allocations from the current Local Plan and were previously considered suitable/sound for development via an independent examination. Environmental policies within the plan also provide protection and set out requirements for the provision of green space.	No	
LPR094	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469236	Site	392 Elm Tree Farm	H2 - Housing Allocations (strategic policy)		Support	These representations have been prepared by ELG Planning on behalf of Mandale Homes in response to Darlington Council's Regulation 18 consultation, where Mandale Homes are promoting land at Elm Tree Farm, Darlington. The site (392) is a housing allocation (Elm Tree Farm) within the current Darlington Local Plan, with Policy H 2 advising that the yield identified (150no.) is for indicative purposes only and the final number of homes to be delivered on site will be determined by the planning application process. With the above in mind, Mandale Homes have previously submitted a pre-application to the Council for 200no. dwellings (this includes the Council owned land) (ref. 25/00021/ PREAPP), with the Council response confirming that: 'the principle of development of this site is acceptable given that it has been identified as a housing allocation in the Local Plan (policy H2) and as it has been included within the development limits of the main urban area (policy H3).'And 'The policy [H2] outlines a yield for indicative purposes only of 150 homes for the site, all of which are anticipated to be delivered during the plan period. The higher yield proposed does not raise any significant policy concerns and as stated the yield within the plan is for indicative purposes only.'In addition to commenting on the Elm Tree Farm allocation specifically, Mandale Homes have also commented on a number of general policies as part of these representations.Policy H 2 – Housing Allocations Table 6.5 within Policy H 2 contains the proposed housing allocations, which continues to include Elm Tree Farm (392). Mandale Homes fully support the continued inclusion of Elm Tree Farm, on the basis it: • Is a sustainable site; • Would deliver a significant quantum of new housing to help meet the needs of the Borough; • Would deliver housing in a suitable location; • Can be delivered; and • Is viable.Within the revised policy the indicative yield at Elm Tree Farm has increased from 150no. to 200no. Mandale Homes completely support this increase, which would reflect a more suitable density of development on the site. It is acknowledged that delivery may be reduced by virtue of the impact on gross to net ratios as a result of the need to deliver the likes of biodiversity net gain (BNG) and sustainable drainage systems (SuDS).Appendix A of the Local Plan Review identifies Elm Tree Farm as starting to deliver from 2027/28, at a rate of 45no. dwellings per annum until 2031, with 20no. delivered in 2031/32. In this regard, it is set to come forward early in the plan period, which Mandale Homes also fully support.	Mandale Homes support the continued inclusion of Elm Tree Farm (site ref 392) as a housing allocation. It is a sustainable site, would deliver a significant quantum of new housing to meet needs, provides housing in a suitable location, can be delivered and is vible. Increase in site yield from 150 to 200 dwellings supported. Delivery proposed in the housing trajectory also supported.	Comments and support noted.	No.	
LPR127, 128 & 129u	Housing	Ros Kain	Historic England		Site	392 Elm Tree Farm	H2 - Housing Allocations (strategic policy)		Neutral	Existing allocation retained with an increase in yield by 50 units. Although the LP Review has increased the site capacity slightly this would not result in any heritage impact.	Site ref 392, Elm Tree Farm allocation statement. Existing allocation retained with an increase in yield by 50 units. Although the LP Review has increased the site capacity slightly this would not result in any heritage impact.	Comments noted.	No	
LPR025	Housing	Kathleen Robinson-Tregear			Section	403 Blackwell Grange East	H2 - Housing Allocations (strategic policy)	6. Housing	Object	I am writing as a resident of the Green Park / Greenmount Road / Coniscliffe Road area to formally object to the Draft Local Plan Review (2025–2042). Having reviewed the Policy Maps and supporting documents, I have serious concerns regarding the soundness of the plan, particularly in relation to the cumulative impact of development, transport infrastructure, and the protection of established residential areas. The allocation of Site 403, together with the wider Blackwell Grange land and other development to the west of Darlington, represents a significant concentration of growth in close proximity to existing residential neighbourhoods. However, the plan does not appear to be supported by a robust cumulative impact assessment. In particular, there is insufficient evidence demonstrating how the combined effects of these developments will be managed in terms of transport, infrastructure capacity, and residential amenity. Traffic congestion is already a well-established issue along Coniscliffe Road and towards Barton. The current road network offers limited and inefficient access to the A1(M), with movements largely forced through the town or towards southern connections. This creates a clear structural constraint in the transport network. Despite this, the plan proposes further development in this area without setting out any credible strategy to address this issue. There is no clear provision for improved strategic connectivity, such as a northern link to the A1(M), which would be necessary to accommodate the scale of growth proposed. As a result, additional traffic will inevitably be channelled through already constrained urban routes, exacerbating congestion, environmental impacts, and pressure on residential streets. In addition, the proximity of the development boundary to established residential areas such as Green Park raises concerns about incremental encroachment. The plan does not provide sufficient clarity or safeguards to prevent gradual expansion or increased development pressure over time. The character of the West End, including the Green Park area, is defined by its low-density layout and high-quality residential environment. However, the plan relies on broadly worded and flexible policies which may allow for inappropriate infill or backland development. This creates a real risk of gradual erosion of the area's character, without clear policy protection. Taken together, these issues indicate that the plan is not: •justified, as it is not supported by proportionate or adequate evidence •effective, as it does not demonstrate how infrastructure constraints will be addressed	Concerns regarding the soundness of the plan in relation to the cumulative impact of development on transport infrastructure and the protection of established residential areas. Concerns with site 403 Blackwell Grange East and other developments to the west.	The Local Plan will be supported by an Infrastructure Delivery Plan outlining what infrastructure is needed to support new development and when. Transport modelling will test highway mitigaton schemes to ensure developments do not have an unacceptable impact on the local and strategic highway network. Site 403 Blackwell Grange East is a housing commitment and has planning permission. Other sites in the west of the urban area also have planning permission, such as Coniscliffe Park North and South. Existing residential areas are protected through policies such as DC1 Sustainable design principles and HC2 Safeguarding Amenity.	No	
LPR042	Housing	Diane Chandler			Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	I strongly object to the change of plan. Done so that it can be allocated for housing. There is too much new house building in this area and I object to this loss of green space. It is constantly being used for dog walking, exercising and local people simply going for a walk. It's a place where people can meet up and get to know others in the local community. Losing this place will take away the opportunity to meet others and it will have a huge impact on people's we'll-being.	Objection to the allocation of site 467 Tees Grange for housing. There is too much new housing in the area. Loss of green space which is used for dog walking, exercise etc.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	

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LPR047a	Housing	Phillip Greer	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	I object to the draft revision of the Darlington Borough Council Local Plan Review (2025 - 2042) and the Local Green Space Designation Report (March 2026) My main objection is about the lack of designation of the Bull Field (referred to as Site LGS27 Tees Grange & Site 467 Tees Grange in Council documentation), as Local Green Space and therefore at its conclusion in the Local Plan as being suitable for development. • This revision would contravene the independence of the planning process. The changes to the 2017 HELAA document and the current adopted Local Plan 2016 - 2036 intentionally seek to remove barriers to the Council granting planning to itself. They are neither independent nor democratic. Furthermore there are numerous inconsistencies between assessments and documents which point to political bias. • Site 467 - Tees Grange (appendices B, draft Local Plan) point B notes that "the site has existing biodiversity value and wildlife habitats and features which should be protected and enhanced". This statement is contradicted in the wildlife section of Site LGS27 - Tees Grange (Site Specific Criteria Assessment) which asks "is there any evidence that there are important habitats or species found on the site - answered NO. This is clearly incorrect. • I am aware that all new developments have to demonstrate a biodiversity net gain of 10% upon completion. I fail to see how that is possible regarding the Bull Field (site 467). It is currently a wildlife haven for Foxes, Stoats, Weasels, Newts, Bats, Sparrowhawks, Egrets & Frogs amongst others and all of which have been recorded with ERIC by residents. How when you concrete over it can you possibly achieve any net gain ? • I object to the Bull Field (site 467) being described as "agricultural" in the current LGS Assessment. It has not been described as this previously and the Council are seeking to	Objection to the allocation of site 467 Tees Grange for housing and for the non designation as a Local Green Space. Inconsistencies between assessments and documents on certain areas, e.g. the ecological value of the site. Concern that the site will not deliver 10% biodiversity net gain. The site is not agricultural land as defined in the Local Green Space Assessment. No mention in the March 2026 HELAA that the adjacent Broken Scar Water Treatment Works is a COMAH site. Concerns raised that sites considered as Local Green Space did not go through a defined scoring matrix and were only considered internally. Comparison provided with two other sites which were designated, highlighting inconsistencies in scoring. The site is not necessary given the reduction of the housing requirement and over delivery of the plan. Concern over the transparency of the consultation process.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR050	Housing	Ian Walker	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	See submission. References to suitability of site and LGS submissions.	Objection to the allocation of site 467 Tees Grange for housing and for the non designation as Local Green Space. The Local Plan is prioritising greenfield land. Excess of house building in the borough harms the character of the town. Allocating the site will contravene the independence of the planning process. Supporting documents are not available. The site has been used for leisure by the community. Inconsistencies between assessments and documents on certain areas, e.g. the ecological value of the site. The site has significant ecological value which has been ignored. Issues with the description of the site in Council documents. Its sole use is not just grazing land. Public opinion has not been taken on board via the pre app process. No mention in the March 2026 HELAA that the adjacent Broken Scar Water Treatment Works is a COMAH site. Concerns raised that sites considered as Local Green Space did not go through a defined scoring matrix and were only considered internally.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR057	Housing	Mark Clayton	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	I object to the plan change relating to the Tees Grange 467 being allocated for housing. There is too much new build housing in our area and i object to the loss of this green space which is important to me. There is also alot of wildlife in the area, which is going to be greatly affected due to potential house builds.	Objection to the allocation of site 467 Tees Grange for housing. There is too much new housing in the area. Loss of green space which is important to the community. Detrimental impacts on local wildlife.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR063	Housing	Ian Barnes	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	1. Over intensification of houses. 2. Loss of recreational area. 3. Bungalows overlooked by two storey properties. As proposed. 4. Removal of open land regarded as parkland by local residents.	Objection to the allocation of site 467 Tees Grange for housing. Concerns around over intensification of houses, loss of recreational area, existing bungalows overlooked by two storey properties and removal of open land considered as parkland.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR066	Housing	James C Watterson	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	1. The loss of yet another green space for not needed housing 2. The Infrastructure cannot support yet more housing in this part of the town. There have been no improvements to roads and a number of years ago Northumbrian Water announced sewage handling was almost at capacity. 3. Using the stile access to the site it has been used for dog walking, recreation and exercise by myself and many others in the 40 years I have lived next to the field. 4. I am concerned about the lack of privacy caused by the dominance and overlooking of the build. 5. I object to building levels which mean my property would be looked into from the road. 6. Object to the noise, disturbance and general loss of quality of life as this development adds no benefit to these. 7. Object to the health consequences there may be in removing the asbestos pipe that is in the ground. 8. Object to the fact that building houses is the only consideration after DBC advised us at the time of building that the land was only suitable for bungalows. 9. Object to the effect this will have on the biodiversity of wildlife such as Foxes, Grouse, Pheasants, Toads, Newts, Birds of Prey, Bats, Voles, Stoats plus the insect population. 10. Object to the light pollution will bring from street lighting and vehicle headlights which with building levels and road position will shine into my house. 11. Object to the site being designated as agricultural land. It was only grazed by a small number of cattle during the 40 years i have been here and then supplemented with root crops (turnips), as it doesn't produce enough grass.	Objection to the allocation of site 467 Tees Grange for housing. A number of issues raised; loss of green space; lack of infrastructure; used for recreation; loss of privacy to existing homes; noise disturbance; health consequences with removing an underground asbestos pipe; DBC advised only bungalows could be built not houses; impact on biodiversity and wildlife; light polution from new homes and vehicles; object to the land being designated as agricultural land.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR070	Housing	R Bradshaw	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	I object to the plan change relating to the Tees Grange site 467 being allocated for housing as there is too much new build housing in our area, and I object to the loss of this green space which is important to me. Is this proposed development really necessary bearing in mind the close proximity of the ongoing project you have between Low Coniscliffe and Staindrop Road? In my opinion absolutely not.	Objection to the allocation of site 467 Tees Grange. There is to much new build housing in the area and it will result in the loss of green space. This development is not necessary given the proximity of housing development at Coniscliffe Park.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR073	Housing	Peter and Marjorie	Residents	No	Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	We object to the plan change relating to the Tees Grange site 467 being allocated for housing. Our area is being overwhelmed by new build housing without adequate provision for Doctors, Dentists & Education facilities. This site is not needed, given outstanding permission for housing in the locality. Of particular concern is the loss of an open space, well used by many residents.	Objection to the allocation of site 467 Tees Grange Farm. The area is overwhelmed by new housing without adequete services. Loss of open space which is used by residents. The site is not needed given permissions in the area.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR088	Housing	Helen Rondo (Petition submitted providing approximately 513 signatures)	Hummersknott Residents Group and Bull Field Protection Group		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	Objection to 467 Tees Grange	Objection to the allocation of site 467 Tees Grange Farm and the failure to designate the area as Local Green Space. Concerns raised with the Local Green Space Designation Report (March 2026); it is not robust and does not consistently apply national standards for determining suitability. The assessment disregards evidence. The objection consists of a number of points. (1) Failure to comply with the NPPF. The site does meet the criteria within the NPPF for LGS designation. It is of particular importance to the community. It is consistent with sustainable development. The site is used regularly by residents as a safe, tranquil, accessible space. It has numerous positive aspects, e.g. recreational value, historic significance and richness of wildlife. It is significantly important to the local community given the evidence submitted (petition, letters of support, LGS applications etc). The site is not extensive. In summary using the NPPF guidance Tees Grange meets the criteria for LGS designation. (2) Lack of transparency in methodology. There has been no standard methodology produced by the goverment. Concern with the lack of thoroughness around the assessment approach. Numerous examples provided. (3) Potential bias in assessment process - examples put forward of Tommy Crooks Park and Bellburn Field. The Council doesn't appear to be applying robust, transparent or fair criteria to the assessment process. Inconsistency in decision making. An alternative site has been designated with similar characterstics. (4) Other areas of concern. It is questioned who has proposed the changes to the Local Plan, are they officer or politically driven. Concern with the publicity of the consultation and lack of community involvement. Concern over the number of greenfield sites proposed for development and not utilising brownfield sites. Proximity of NWL water treatment works, chlorine storage and designation as a COMAH site. Submission includes; a petition signed by approximately 513 residents objecting to the development of the site, letters of support for designating as LGS and evidencing community use, newspaper articles about the history of the site and maps highlighting the	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR120b	Housing	Councillor Bryony Holroyd	Darlington Green Party		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	b.Tees Grange Farm - residents are concerned whether soil chlorine levels monitored, as well as amounts stored on site, are safe. Also, the type & sizes of homes proposed must meet the needs of the local community (smaller desirable downsizing opportunities are most lacking in an area where home under-occupation is the biggest problem - so the site proposals aren't currently meeting local need), sworn affidavits have been prepared showing long-term community use of the bull field, and important archaeological remains on the site - all render it unsuitable.	Concerns raised regarding the allocation of site 467 Tees Grange. Concern with soil chlorine levels as well as amount of chlorine stored on site. Homes should meet local needs which are for smaller dwellings suitable for downsizing. To address issues with under occupation. The site is unsuitable due to long term community use and archaeological remains.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR127, 128 & 129w	Housing	Ros Kain	Historic England		Site	467 Tees Grange			Neutral	See Appendix B of submission. The site area of 6.84 hectares is proposed to deliver 89 dwellings. The closest designated heritage asset is the Coniscliffe Road Waterworks. This is a Scheduled Monument and prominent local landmark. The Scheduled Monument is south of Coniscliffe Road. The site is located to the north of an existing housing development (Coniscliffe Mews) also accessed from Coniscliffe Road. The site has archaeological potential. DBC should consider whether a HIA is necessary. This should include any NDHAs falling within the site or close to it, and consider the proximity to the Scheduled Monument and the archaeological potential identified. Coniscliffe Mews is a later 20th century residential development with design quality and a greater sense of place than more generic 21st century developments. If this site is allocated, we suggest Design Guidelines are specified. This should draw upon the attractive variations in architectural detailing, scale and massing and soft landscaping represented in this built form. Suggested change - DBC should consider whether an HIA is required. The Historic Environment and Site Allocations in Local Plans We support the archaeological requirements set out in the Appendix. We suggest Design Guidelines are produced for this site and informed by the best quality development in the vicinity of the site.	Site ref 467 Tees Grange Farm - The closest designated heritage asset is the Coniscliffe Road Waterworks. This is a Scheduled Monument and prominent local landmark to the south of Coniscliffe Road. The site has archaeological potential. Support for the archaeological requirements set out in the appendix. DBC should consider whether a HIA is necessary. This should include any NDHAs falling within the site or close to it, and consider the proximity to the Scheduled Monument and the archaeological potential identified. If this site is allocated, we suggest Design Guidelines are specified. This should draw upon the attractive variations in architectural detailing, scale and massing and soft landscaping represented in this built form.	Having asessed the likely impacts on the Scheduled monument we do not consider the proposal will have a significant enough impact to require a Heritage Impact Asessment. Further design guidelines to be included.	Yes	Include design guidelines for the site.
LPR130	Housing	Beverley Thomas	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	I am writing to object to the proposed development on green belt land. The fundamental purpose of green belt is to prevent urban sprawl, safeguard countryside from encroachment, and preserve the character of rural communities. The proposed development would directly undermine these objections. This land is not only valuable for its openness and visual amenity but also its ecological importance. It provides habitat for wildlife and contributes to local biodiversity which would be significantly and irreversibly harmed. In a time when environment protection is increasingly critical the loss of such land can not be justified. Local infrastructure would also be impacted including healthcare already impacted and under pressure.	Objection to the allocation of site 467 Tees Grange for housing. A number of concerns raised. The land is greenbelt and purpose is to prevent urban sprawl and safeguard the countryside. The site is valuable for its openness, visual amenity and ecological importance. Local infrastructure and services would be negatively impacted upon.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	

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LPR131	Housing	Helen Rondo	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	My complaints are mainly against the inclusion of Site 467 Tees Grange / LGS27 Tees Grange (known locally as the Bull Field) in the Local Green Space Designation Report and therefore the Draft Local Plan. My objections to the inclusion of that site are very much reflected in the objection I submitted on behalf of the Hummerskinott Residents Group. It serves little purpose to repeat them here, although I would like to express in this objection that I wholeheartedly support the views of the group, and wish that objection to be considered alongside this one. On page 20 of the tracked draft plan paragraph 4(if) states an objective of the council is to `improve access to green spaces for leisure and recreation`, yet the council consistently takes the easy option of building on green spaces. It seems that a significant number of brownfield and town centre sites have been removed from the plan, despite the NPPF guidance, Local Plan statements and many of the councils' own policies, stating that brownfield development should take priority. DBC seems to take the approach that writing a policy down is enough – they then make no attempts to meet the standards set by those policies. The council's apparent willingness to hand over green sites means developers are not motivated to look to develop the more complex brown field sites. Paragraph 3.0.3 states that `failure to respect the scale and function of places can lead to inappropriate development`. Paragraph 9.3.1 reflecting the NPPF reinforces that sentiment `valued landscapes should be protected...` apparently the Local Plan seeks to protect `rural gaps, green wedges and green corridors`, yet despite the council receiving many pieces of evidence that show how the community values and uses this green space they seem determined to disregard their own plan and are determined to continue with allowing the potential for development on the site. The Local Plan is extremely focused on the deliverability of sites rather than meeting housing needs. The draft Local Plan (and associated documents) consistently talks of the need for affordable housing, social housing, adaptable housing and housing in the town centre. Yet a recent FOI, reported on SWAG social media states `since August 2015, 5,157 new houses had been approved in the borough. Only 1,175 of those approved were `affordable` and ultimately only 808 affordable houses were built. ` DBC's own figures record a consistent shortfall in the delivery of affordable housing in sites granted planning approval. There are also 784 `long term empty houses` in Darlington. It would seem to me that the council should be looking at ways to meet actual housing needs rather than saying yes to developments that are biased towards the purposes of the council (political and financial) rather than the real needs of the residents of Darlington.	Objection to the allocation of site 467 Tees Grange Farm and the failure to designate the area as Local Green Space. Concerns raised with the Local Green Space Designation Report (March 2026). Reasons for objection are reflected in the Hummerskinott Resident Group submission. Concern with the loss of the green space which conflicts with Local Plan policy. Focus on greenfield rather than brownfield sites which should be a priority. Some brownfield sites have in fact been removed from the plan. The Council should be addressing affordable housing needs and looking at empty homes rather than the deliverability of sites. Concern with housing requirement figure. Commuities should decide LGS deisgnations. The cosultation process for the Local Plan has not happened in a meaningful way and the Council has not followed its own process. Sufficient publicity not undertaken.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR031	Housing	Chris Park			Site	467 Tees Grange Farm	H2 - Housing Allocations (strategic policy)		Object	Assuming this is the Bull Field I think it is totally inappropriate to build on more of Darlington's beautiful green land with inadequate road access.I would like to add my objection to this proposal.	Objection to the allocation of site 467 Tees Grange. It is inappropriate to build on more of Darlington's beautiful green land with inadequate road access.	See combined 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)'	No	
LPR127, 128 & 129x	Housing	Ros Kain	Historic England		Site	468 Kendrew St Car Park Regeneration Area			Neutral	See appendix B of submission. The allocation of this site must be informed by the Northgate Urban Design Masterplan Framework. We note this is a proposed allocation 1.34 hectares (125 dwellings). This site is partly in a Conservation Area and in the setting of listed buildings. The site contains some NDHAs. We note an application for outline planning permission is pending. Historic England has requested any development is informed by the Northgate Masterplan 2022. Are the Development Zone referenced A, B & C informed by the Masterplan? Suggested change - A HIA is required * The Historic Environment and Site Allocations in Local Plans This should be cross referenced to the Northgate Masterplan. The policy text should be informed by the findings of the HIA and the recommendations of the Masterplan.	Site ref 468, Kendrew St Car Park Regeneration Area. The allocation of this site must be informed by the Northgate Urban Design Masterplan Framework. This site is partly in a Conservation Area, in the setting of listed buildings and contains some NDHAs. A HIA is required. This should be cross referenced to the Northgate Masterplan. The policy text should be informed by the findings of the HIA and the recommendations of the Masterplan.	Comments noted. The Council will undertake an HIA for the site. There is heritage criteria within the proposed allocation statement and this will be updated if necessary once the HIA is complete.	No	
LPR120c	Housing	Councillor Bryony Holroyd	Darlington Green Party		Site	471 Land east of Maidendale (Former Ingenium Parc)	H2 - Housing Allocations (strategic policy)		Object	a.We raise concerns over the allocation of Ingenium Parc site for housing - only in that it has few / no existing services & connections. We must ensure that the site is provided with adequate public transport, safe active travel infrastructure, local shops and services, community centre etc. where these aren't already available within a 10-minute walk, to ensure a new sustainable community is created (unlike Neasham Road site with no on-site shops, public transport or community services). This is true for any other site allocated - it must meet 20-minute neighbourhood principles.	Concerns with the allocation of site ref 471 Land east of Maidendale (Former Ingenium Parc). Main issue raised is that it has few / no existing services, infrastructure and connections. The site must meet 20 minute neighbourhood principles.	The Council has put forward sites for allocation which are considered the most suitable and sustainable for development. This has been informed by the HELAA and SA process. The Local Plan will also be supported by an Infrastructure Delivery Plan and highways modelling to ensure developments are supported with suitable infrastructure and highways mitigation.	No	
LPR127, 128 & 129y	Housing	Ros Kain	Historic England		Site	471 Land east of Maidendale (former Ingenium Parc)			Neutral	See appendix B of submission. We note this is a proposed residential allocation (30.65 ha) and could deliver 720 residential units over the Plan Period). This proposed allocation would replace an employment site (Site 356 - a 40.8 ha industrial and commercial development site south of the Cummins Factory on Yarm Road). The site is due south of the Grade II* listed Cummins Factory. The factory is set in minimalist designed grounds subject to an individual designation as a Registered Park & Garden. The listing description refers to views from this site - fields to the south - to the RP&G. The level topography of this site is such that a direct relationship exists between the heritage designations and the proposed allocation site. Although a HIA was carried out in 2019, this needs to be amended to reflect the alternative use proposed (720 residential units) A Design Code is also strongly recommended if this site is allocation for residential use. This must ensure the scale, massing and design is informed by the distinct architectural interest of the Factory and the designed grounds it sits within. The Design Code should also consider the S&DR Branch Line which runs along the south boundary, albeit this is live railway line. Suggested change - A HIA is required * The Historic Environment and Site Allocations in Local Plans This should consider the impact of a residential allocation in lieu of the employment allocation. Design Code requirement should be added to the site requirements including any recommendations of the HIA. Consider whether the S&DR walking and cycling route can be incorporated into the site layout.	Site ref 471 Land east of Maidendale (former Ingenium Parc). This proposed allocation would replace an employment site. The site is due south of the Grade II* listed Cummins Factory and Registered Park & Garden. Although a HIA was carried out in 2019, this needs to be amended to reflect the alternative use proposed (720 residential units). A Design Code is also strongly recommended if this site is allocation for residential use. This must ensure the scale, massing and design is informed by the distinct architectural interest of the Factory and the designed grounds it sits within. The Design Code should also consider the S&DR Branch Line which runs along the south boundary, albeit this is live railway line.	The site HIA is to be reviewed. The allocation statement will be updated to reflect the findings and to include a design code if considered necessary.	No	
LPR127, 128 & 129u	Housing	Ros Kain	Historic England		Site	504 Snipe Lane Hurworth (phase 2)			Neutral	See Appendix B of submission. This is an additional allocation adjacent to an existing allocation / housing commitment. Phase 1 – 700 units. Phase 2 site reference number is 504. The site area is 10.28 proposes an additional 145 units. If the total site area has been increased and the quantum of development increased to 845. DBC should be sure there is no cumulative impact on the historic environment from Phase 1 & Phase 2. Suggested change - DBC should consider whether a HIA is required. The Historic Environment and Site Allocations in Local Plan	Site ref 504 Snipe Lane Hurworth (phase 2). This is an additional allocation adjacent to an existing housing commitment. Phase 1 – 700 units. Phase 2 site reference number is 504. The site area is 10.28 proposes an additional 145 units. If the total site area has been increased and the quantum of development increased to 845. DBC should be sure there is no cumulative impact on the historic environment from Phase 1 & Phase 2. DBC should consider whether a HIA is required.	The quantum of development has not been increased for this site overall. The site has been split to identify the area which does not have planning permission and therefore continued to be proposed as an allocation. The part which does have planning permission and is currently building out is now identified as a housing commitment. As such it is considered that an HIA is not required as there will not be an additional impact on the historic environment.	No	
LPR052i	Housing	Louise Tait	Environment Agency		Site	504 Snipe Lane Hurworth Moor	H2 - Housing Allocations (strategic policy)	Housing	Neutral	Based on our limited records there is a former landfill located on land adjacent to this allocation. The former landfill site is known as Area B East of Skerne Park. The site operated and closed Pre COPA 1974. The Environment Agency holds no information on the types of waste the site accepted or when the site operated. The local authority may hold further information on this historic closed landfill site.	There is a former landfill located on land adjacent to this allocation (Area B East of Skerne Park). The site operated and closed Pre COPA 1974. The Environment Agency holds no information on the types of waste the site accepted or when the site operated. The local authority may hold further information on this historic closed landfill site.	Comments noted.	No	
LPR104x	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621239	Site	85 Land at Coniscliffe Road, Low Coniscliffe	H2 - Housing Allocations (strategic policy)		Object	Concerns raised with policy H2 and the narrow range of sites allocated. Alternative sites at Berrymead Farm and Coniscliffe Rd should be allocated. (HELAA site ref 49 and 85). See proposed submission.	Concern with the approach to site selection in policy H2. The plan relies on only 11 allocations the majority of which are in the current plan. This is an overly narrow and inflexible approach. Development is also constrained to settlement boundries via policy SD3. Lack of evidence on consideration of alternatives and explanation of why suitable, available and achievable sites with the draft HELAA have not been taken forward for allocation. The Council should consider a broader range of sites to support housing supply. Issues such as delays with delivery and longer lead in times referenced. An updated housing and economic needs assessment should be prepared along with a reassessment of HELAA sites. Land at Berrymead Farm (HELAA site ref 49) and Coniscliffe Road (HELAA site ref 85) should be allocated for housing development.	The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. If a site is catergorised as suitable, available and deliverable in the HELAA it does not necessarily mean that it will be proposed for allocation. At this time there is not the quantitaive need for site at Berrymead Farm. The Coniscliffe Road site is not considered suitable as it is essential for maintaining the openness of the area and separation of Low Coniscliffe, Merrybent and the main urban area.	No	
LPR095	Housing	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Site	Site 468 Kendrew St car park regeneration area	H2 - Housing Allocations (strategic policy)		Neutral	Site Representation for South of Gladstone Street. Please see submitted documents.	The landholdings in which our client has an interest in are included within the area of site 468 Kendrew Street Car Park Regeneration Area. We are generally supportive of its inclusion in policy H2. However there are concerns about the limited extent of the allocation and it is requested that it is expanded to included other uses to facilitate future development. The site has the potential to support a more co-ordinated approach to sustainable development. For example a care facility (use class C2) is currently being considered for the site. It is suggested that additional text is added to the allocation statement. "The site is allocated for housing, with a yield of approximately 125 dwellings together with compatible mixed commercial development and with the opportunity to support specialist housing"	The changes proposed are considered acceptable.	Yes	Update appendix B allocation statement for site 468 with the suggested wording in first paragraph - The site is proposed for allocation for mixed use development with an indicative yield of 125 dwellings, including compatible commercial development and potential for specialist housing.
LPR041b	Housing	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy		H2 – Housing Allocations (strategic)		Object	NPPF paragraph 73 states small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. It continues to promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. Table 6.4, summary of five year supply, row A states that there are no sites of 10 dwellings or less with outline or full planning permission. Table 6.4 row F includes a small sites allowance of 125 dwellings. In Table 6.5, Housing Allocations, none of the listed sites are less than one hectare in area. Additionally 10 of the 11 sites allocated / proposed to be allocated are Urban Extension or Urban Area sites. There is only one allocation in the Villages, Beech Crescent East, Heighington. This is an existing allocation, not a new allocation. There is an undue over emphasis on Urban Extension and Urban Area sites. This is not sustainable and is not consistent with national policy, NPPF para 36 criterion d). In Table 6.7 Housing Commitments, only sites 78, 395, 412, 424, 425, 426 and 429 are less than one hectare in area and have completions remaining to be delivered. Considering these in turn; Site 78 has 3 dwellings remaining to be completed. Site 395 has 46 dwellings remaining to be completed. Site 412 has 16 dwellings remaining to be completed. Site 424 has 24 dwellings remaining to be completed. Site 425 has 18 dwellings remaining to be completed. Site 426 has 14 dwellings remaining to be completed.	Concerns raised with the mix of housing sites in the the draft Local Plan. The NPPF requires that local planning authorities should identify through the development plan and brownfield registers land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. The draft Local Plan does not achieve this requirement. There is an over emphasis on urban extensions and urban area sites with only one allocation located in the villages (Beech Crescent East, Heighington). This is not sustainable and is not consistent with national policy. Additional provision of small sites is necessary particularly at the rural villages. Proposed allocations put forward at Former MW Wood Nursery, New Lane, Neasham and land to the east of 30 New Lane, Neasham.	The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking.	No	

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LPR044b	Housing	Vanessa			Policy		H2 – Housing Allocations (strategic)		Object	Site Allocations Ingenium Parc - concern that this (& all sites) must have shops, services and public transport built in, to ensure new homes are accessible 15-20 minute communities. Tees Grange Farm / Bull field - It is disputed that chlorine levels are safe, proposed home types & sizes are unsuitably large (under-occupation issues), community use and archaeological remains make it unsuitable.	Concern that the housing allocations must have services and public transport incorporated. Specific reference to site ref 471 land east of Maidendale (former Ingenium Parc). Concerns raised with site ref 467 Tees Grange due to chlorine levels, proposed house types are too large (under-occupation issues), community use and archaeological remains.	The Council has put forward sites for allocation which are considered the most suitable and sustainable for development. This has been informed by the HELAA and SA process. The Local Plan will also be supported by an Infrastructure Delivery Plan and highways modelling to ensure developments are supported with suitable infrastructure and highways mitigation. Also see 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm'	No	
LPR022	Housing	Michael Drysdale	N/A		Policy		H2 Allocations (Strategic)		Object	Reading the number of houses that are to be built, the infrastructure to support these houses will have to be dramatically improved. The Hospital is starting to look old, no viable parking following the Barn rush, Roads are in a shocking state, regardless of you boasting of getting an award for fixing potholes, Lack of school places for all the children that will supposedly move to the area or will be born and grow up here, Lack of doctors, Lack of dentists every thing appears to be targeted at building thousands of houses, that quite frankly the town cant manage, if you travel at busy times in Darlington the roads are gridlocked.	Objection to policy H2 and the proposed number of homes to be built. Concerns there is not the infrastructure to support the new homes. Roads are in a poor state and congested. Hospital requires investment and lack of school places, doctors and dentists.	The Local Plan will be supported by an Infrastructure Delivery Plan outlining what infrastructure is needed to support new development and when. Transport modelling will test highway mitigaton schemes to ensure developments do not have an unacceptable impact on the local and strategic highway network.	No	
LPR028	Housing	Lee Whatmore			Section		H2 - Housing Allocations (strategic policy)	6. Housing	Object	I am a resident of Burtree Lane (No. 30), directly adjacent to land that has previously been acquired for residential development. I understand that this area is being considered for significant housing growth, and I would like to raise the following concerns and observations. Firstly, my primary concern relates to infrastructure, particularly traffic and pedestrian safety. Burtree Lane already experiences traffic pressures, and any increase in housing will inevitably add to this. At present, pedestrian access in the area is inadequate. There is a lack of safe, continuous walkways connecting existing and future residential areas, which creates a genuine safety risk for those walking locally. Previous opportunities to improve pedestrian infrastructure have not been taken forward, and this must be addressed as a priority if further development is proposed. I would strongly urge that any allocation of housing land in this area is accompanied by: * Meaningful upgrades to road infrastructure to accommodate increased traffic * Safe, well-designed pedestrian routes linking to surrounding residential areas and local amenities * Consideration of connectivity as a fundamental initial requirement, not an afterthought. Construction works due to heavy traffic will make walking more worry some than it already is. the walkways need installing before one brick is laid! Secondly, while I do not object in principle to development on the adjacent land, I believe that any proposals should be planned comprehensively. I own approximately one acre of land adjoining the area in question. At present, access to this land is restricted; however, if the neighbouring land is brought forward for development, it would be logical and beneficial for infrastructure (such as roads and access points) to be designed in a coordinated manner. I would like to build 2 bungalows to the rear of my property and access via this development would be sensible and a coordinated best use of land availability. In this context, I would ask the Council to consider a more integrated approach to land use in this location. This could include enabling appropriate access to neighbouring land parcels, such as my own, so that any future development is cohesive, efficient, and supported by shared infrastructure rather than piecemeal arrangements. In summary, my position is as follows: * I have significant concerns regarding traffic impact and pedestrian safety * I believe infrastructure improvements must be a prerequisite for development * I support a coordinated approach to development that allows adjoining land, including my own, to be sensibly integrated where appropriate I would appreciate it if these comments could be taken into account as part of the consultation process.	Concerns raised regarding any further housing development in the Burtree Lane area. Significant concerns regarding traffic and pedestrian safety. Infrastructure improvements must be a prerequisite for development. Support for a coordinated approach to development that allows adjoining land, including my own, to be sensibly integrated where appropriate.	No additional housing allocations are proposed in the Burtree Lane area. The Local Plan will be supported by an Infrastructure Delivery Plan outlining what infrastructure is needed to support new development and when. Transport modelling will test highway mitigaton schemes to ensure developments do not have an unacceptable impact on the local and strategic highway network.	No	
LPR028d	Housing	David Phillips	Butterfly Conservation North East		Policy		H2 - Housing Allocations (strategic)		Object	Items 6.6.1-6.6.3 Policy H & H6. The scale of committed development and the number of proposed new dwellings including Burtree Garden Village, Skerningham Garden Village and Coniscliffe Park is noted. These developments on the rural-urban edge will make it more difficult for people to access green spaces and the countryside. Indeed, the continued erosion of green spaces through cumulative development within the borough significantly damages the environment, changes the character and distinctiveness of the landscape and damages residents' quality of life as well as well as significantly increasing pressure on remaining nearby green spaces. This draft plan therefore needs to recognise a requirement for quality green space including wildlife friendly green space to promote health and well-being and reduce health inequalities, particularly where proposed major development will result in the countryside being pushed further away. The risk of disturbance from increased footfall, domestic animals and increased noise and lighting from new developments will make it more difficult for wildlife to thrive. This plan needs to recognise this risk and look at mitigating measures, particularly if developments go head at at the above places and at Maidendale, Burtree and Snipe Lane close to existing Local Nature Reserves.	The housing development committed on the rural-urban edge of Darlington (Burtree GV, Skerningham, and Coniscliffe Park) will make it more difficult for people to access green spaces and the countryside. Concerns regarding impacts on the environment, landscape character and quality of life. The plan needs to recognise the requirement for quality wildlife friendly green space. Mitigation measures needed if development is to go ahead at Maidendale, Burtree and Snipe Lane close to existing Local Nature Reserves.	Housing sites proposed for allocation are considered the most suitable and have been selected using the HELAA and SA process where environmental impacts are fully considered. There are also a number of environmental policies within the draft plan which protect environmental features, promote biodiversity and require the provision of green space.	No	
LPR051g	Housing	Chris Martin	HBF		Policy		H2 - Housing Allocations (strategic)		Neutral	HBF does not comment on specific housing allocations, although the Council will need to demonstrate through evidence that the allocations it is putting forward are sustainable, meet the needs of the Borough in terms of their location, can be delivered and are viable. The HBF would also support the allocation of a wide selection of sites in terms of sizes, which should include smaller sites. This will assist in the delivery of homes by Small and Medium Enterprises (SMEs), who often operate in more constrained financial circumstances and therefore need the certainty of allocations for their businesses to best operate. Table 6.6 of the Local Plan Review notes that the total supply that the Council considers can be delivered over the plan period is 9,456 dwellings. This figure comfortably exceeds the minimum LHN figure in Policy H1 (7,582 dwellings) and therefore further underlines that the Council has the supply to achieve a higher housing requirement and therefore there is no reason as to why the Council cannot be more ambitious when it comes to housing growth. The HBF also notes that where the adopted Local Plan states: "The sites will provide a supply of housing land sufficient to evidence a deliverable five year rolling housing supply in accordance with the National Planning Policy Framework." The Council is proposing to remove the word 'rolling'. It is unclear as to the rationale for this change and without the word 'rolling', the policy is not clear that this should be a consistent requirement over the plan period. For clarity, the HBF considers that the wording should be amended to: "The sites will provide a supply of housing land sufficient to annually evidence a deliverable five year housing supply in accordance with the National Planning Policy Framework." This wording better aligns with the NPPF (see paragraph 78).	The HBF would support the allocation of a wide selection of sites in terms of sizes, which should include smaller sites. This will assist the delivery of homes by Small and Medium Enterprises (SMEs). Commented that the housing land supply is higher than the housing requirement and therefore there is no reason why the Council cannot be more ambitious with housing growth. Noted that the word 'rolling' is proposed to be removed from the policy with regards to five year housing land supply. It is suggested that the wording should be amended to "The sites will provide a supply of housing land sufficient to annually evidence a deliverable five year housing supply in accordance with the National Planning Policy Framework." to better align with the NPPF (paragraph 78).	Comments noted. The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. Large strategic sites are also being divided into smaller sites and brought forward by different house builders. The word rolling was removed from policy H2 given it no longer featured in the NPPF. However it is agreed to include the addition of the word 'annually' within the policy so that it is consistent with national policy.	Yes.	Amend the wording in policy H2 to read "The sites will provide a supply of housing land sufficient to annually evidence a deliverable five year housing supply in accordance with the National Planning Policy Framework."
LPR059 & 60d	Housing	Dominic Crowley	Lichfields		Policy		H2 – Housing Allocations (strategic)		Object	Limited information is provided on the proposed additional housing allocations. Although it is understood that the Council have confidence in their deliverability, they are subject to constraints associated with their urban environments and historic uses, including likely remediation costs of some sites and the complexities of delivering large strategic urban extensions which mean they should be accompanied by a series of smaller sites to ensure continuity of delivery - Hallam Land wish to raise concerns in this respect. Hallam Land have previously highlighted the development opportunity on their land to the west of Roundhill Road in Hurworth (SHLAA Site Ref: 449) which is not subject to any constraints which would affect deliverability and could deliver around 150 new homes in a very high quality, sustainable development in the short-medium and without significant or onerous infrastructure or site preparation works. Whilst we understand the Council have undertaken a comprehensive review of sites submitted to them in the 2025 Call for Sites when determining the additional allocations, it is essential that evidence of deliverability be provided on the proposed allocated sites to ensure they are sound.	Limited information is provided on the proposed additional housing allocations. The sites are subject to constraints associated with their urban environments and historic uses, including likely remediation costs of some sites and the complexities of delivering large strategic urban extensions. They should be accompanied by a series of smaller sites to ensure continuity of delivery - concerns raised in this respect. Alternative site put forward for allocation west of Roundhill Road in Hurworth (SHLAA Site Ref: 449) which is not subject to any constraints and could deliver around 150 new homes. It is essential that evidence of deliverability be provided on the proposed allocated sites to ensure they are sound.	The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. Large strategic sites are also being sectioned into smaller sites and brought forward by different house builders. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. The alternative site referenced has been considered as available, suitable and achievable in the draft HELAA site assessment, however it is not considered necessary to meet housing needs at this time. Further evidence on the deliverability of the allocations will be published at the next stage.	No	
LPR064 & 065f	Housing	Nick Pleasant	Stantec on behalf of Vistry		Policy		H2 – Housing Allocations (strategic)		Object	In line with their position on Policy H1, Vistry strongly objects to the direction chosen by DBC in relation to its overarching housing strategy, including the approach set out in Policy H2. Policy H2 states that the land allocations required to meet the housing target are already provided for within the adopted plan, notwithstanding the extended plan period to 2042, and as such no additional large-scale housing allocations have been proposed. Stantec analysis of the Housing Allocations highlights a significant reliance on a number of large strategic sites carried forward from the adopted plan which have yet to commence delivery. These include sites such as Burtree Garden Village (formerly Greater Faverdale), Skerningham, and Land South of the Railway. In addition, Policy H2 relies on several allocated but uncommitted sites, which are assumed to deliver early in the plan period. Given the failure of the adopted plan to secure the commencement of a substantial proportion of allocated housing sites, Vistry considers it essential that robust and proportionate evidence of deliverability is provided as part of the Draft Plan's evidence base. This is necessary to provide confidence that the proposed allocations strategy is sound and capable of delivering the intended level of housing growth. It is essential the local plan follows the stated purpose of the settlement hierarchy and the evidence behind it and allocates a range of sites (of varying scales) in a range of locations (including service villages). A failure to allocate land outside of the urban area simply perpetuates an issue of not delivering the most local levels of growth within the borough. It results in development which does not necessarily deliver development where it is needed and prevents those seeking a home in the smaller settlements from accessing such homes. See submitted attachment.	Objetion to the approach in policy H2. No additional large scale housing allocations have been proposed despite the extended plan period. Significant reliance on a number of large strategic sites carried forward from the adopted plan which have not yet commenced delivery. Reliance on allocated sites to deliver early in the plan period which require planning permission. Evidence on deliverability is essential given that a substantial proportion of allocated sites have not commenced development. A range of sites of different sizes and locations should be provided following the settlement hierarchy.	To clarify 3 new housing allocations are proposed. The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. Large strategic sites are also being divided into smaller sites and brought forward by different house builders. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. Further evidence on the deliverability of sites is to be provided at the next stage.	No	
LPR067 & 68e	Housing	Georgina Cox	Gladman		Policy		H2 – Housing Allocations (strategic)		Object	See submitted attachment. Gladman would encourage a wider variety of sites are allocated and so including more small to medium sized sites. This will ensure the council can maintain a robust five year housing land supply when larger strategic sites may be delayed due to their longer delivery times. These small to medium sized sites should be considered from within the tier 2 settlements which are sustainable to accommodate the growth and settlements that can also support the growth of the tier one Darlington settlement. A prime example of one being is Middleton St George situated southeast of the tier 1 settlement, it has the established infrastructure to allow for growth in the next five to ten years while supporting Darlington with it being located off the A67.	Gladman would encourage a wider variety of sites are allocated and so including more small to medium sized sites. This will ensure the Council can maintain a robust five year housing land supply when larger strategic sites may be delayed due to their longer delivery times. Small/medium sites should be considered for allocation in the tier 2 settlements such as Middleton St George.	The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. Large strategic sites are also being sectioned into smaller sites and brought forward by different house builders. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. The alternative site referenced has been considered as available, suitable and achievable in the draft HELAA site assessment, however it is not considered necessary to meet housing needs at this time. Further evidence on the deliverability of the allocations will be published at the next stage. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners.	No	

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LPR067 & 68f	Housing	Georgina Cox	Gladman		Policy		H2 – Housing Allocations (strategic)		Object	See submitted attachment. Site submission for land west of Middleton St George. Gladman are promoting Land West of Middleton St George shown below in figure 1 with the revised development framework plan for the site. The site sits west of Grendon Gardens and south of an approved application for 198 dwellings which has now nearly been built out. Middleton St George is a tier 2 'Service Village' in the adopted development plan, which is recognised to offer a range of facilities and services. Growth was directed to northwest of the settlement through an allocated site for 260 dwellings in the adopted plan. While land south of the allocation has come forward also, the land being promoted by Gladman as shown in the image above is the next logical parcel to round off development in the settlement. The settlement sits southeast of the tier 1 'Darlington Urban Area,' and is well connected on the regional road network, the A67 runs north of the settlement and connects the site to the tier 1 settlement, there is also the train station Dinsdale that connects the settlement directly to Darlington's Urban core. The site was previously considered suitable as a draft allocation and therefore should be considered favourably again. Gladman considers the land suitable for allocation in the emerging plan, supported by the fact that the site was previously identified for allocation. Middleton St George is a tier 2 settlement which offers an array of services and facilities within walking distance including a primary school, pharmacy, local shops and more. While the settlement itself offers amenities, it also sits southeast of Darlington's Urban Core. There is the Dinsdale train station less than a ten minute walk from the site, trains travel into Darlington every thirty minutes and only take ten minutes, making the urban core easily accessible while utilizing sustainable transport methods from the site. Additionally, there is a bus stop for the number 6 bus service which also travels directly into the centre of Darlington with buses every hour. The settlement has seen significant growth in the past ten years due to its sustainability and capacity to accommodate growth. The land being promoted would relate well to the existing settlement area, allowing for a logical extension to the recent growth. The site has a previously refused outline application (Ref: 19/00231/OUT) for up to 160 dwellings, public open space, landscaping and sustainable drainage system. All matters reserved except for means of vehicular access from The Greenway. Since the application was refused in November 2020, Gladman have worked to resolve the reasons for refusal.	Gladman are promoting land west of Middleton St George - HELAA site 375 Land South of High Stell. Submission highlights that Middleton St George is a tier 2 service village which offers a range of facilities and services. Growth has been directed here in the past due to the village's sustainability and capacity to accommodate growth. The site was considered suitable as a draft allocation previously and should be identified as a suitable allocation in the emerging plan. It is a logical extension to the recent growth. Site previously refused for outline permission (19/00231/OUT) for 160 dwellings. Gladman have revised the development framework with a reduced number of dwellings (146) and more open space provision (see submission).	Site 375 Land South of High Stell has been considered as not suitable for development in the draft HELAA assessment. A suitable access cannot be achieved with the access through the adjoining estate already at maximum capacity.	No	
LPR071a	Housing	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy		H2 – Housing Allocations (strategic)		Object	Client supports the following allocations, as identified in Policy H2, subject to the comments set out within the attached submissions. Site ref 504 Snipe Lane Site ref 467 Tees Grange Site ref 471 Maindendale (Ingenium Parc) See submission for further comments and proposed changes.	Client supports the following allocations, subject to the comments set out. Site ref 504 Snipe Lane Site ref 467 Tees Grange Site ref 471 Maindendale (Ingenium Parc). Detailed layout work has been undertaken for site 504 and the site can accommodate up to 180 dwellings. The indicative yield should be increased from 145 dwellings to 180 in both policy H2 and the allocation statement in appendix B. Site 467 access involves the demolition of an existing property on Conniscliffe Road. The policy map should be amended to illustrate this and the allocation statement in appendix B amended to identify the access requirement. Requested that site 471 is altered to extend further north and that the allocation statement is updated to set out that land south of the railway is to be provided as an area for biodiversity net gain. Alternative site proposed for allocation - the northern part of site ref 500 Land at Faverdale East Business Park could deliver 340 dwellings.	The yield for site 504 Snipe Lane, Hurworth Moor, Phase 2 will be increased to 180 dwellings as advised given that layout work has been undertaken. Comments noted regarding site 467 Tees Grange. The site boundary will be updated to reflect the current planning application which includes site access involving the demolition of an existing property. The allocation statement will also be updated to include this. Site 471 Land east of Maidendale (former Ingenium Parc) agreed for site area to be altered and the area south of railway identified as an area for BNG. Site 500 is not being proposed for housing given it is within a largely existing empowment area and there is significant ecological value on the site (open mosaic habitat).	Yes	Increase yield for site 504 Snipe Lane, Hurworth Moor, Phase 2 to 180 dwellings in policy H2, Appendix A Housing Trajectory and Appendix B allocation statements. Alter site area for 467 Tees Grange to be in line with the current planning application and update the asscoaited allocation with the access proposal. Update site area for 471 Land east of Maidendale (former Ingenium Parc) as suggested and update allocation statement.
LPR089	Housing		Karbon Homes	Alanzon Chan GFW LLP Dean Street Arch, 22 Dean Street, Newcastle-upon-Tyne	Policy		H2 – Housing Allocations (strategic)		Object	Re - Land south of School Aycliffe (HELAA site ref. 455) - please see submitted documents	Karbon Homes request that Land south of School Aycliffe [HELAA site ref 455) is allocated for residential development in policy H2 or identified as a safeguarded housing site to provide flexibility and resiliance in the hsouing land supply. The Site is suitable, available and achievable, and its allocation is necessary to ensure the Draft Plan is positively prepared, justified and effective. The site can accommodate 120 dwellings. It is a logical extension to School Aycliffe and is a sustainable location with access to services and facilities in Heighington and Newton Aycliffe. No significant site constraints. Concerns that the site has been discounted for a low DfT connectivity score in the HELAA when an existing housing allocation achieves a very similar score. Karbon Homes would look to deliver over the policy requirement for affordable housing in this area which is 20%. The distribution of allocations raises significant concerns regarding deliverability and flexibility. Housing supply is reliant on a small number of large strategic sites (Skerningham and Burtree GV). This involves delivery risks and progress on these sites appears limited. There is only one housing allocation in the borough's villages. This restricts the growth of these settlements.	The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. Comments noted regarding site 455 Land South of School Aycliffe and the related connectivity score. It has however been considered as not suitable within the HELAA assessment. It is appreciated that the overall score for the site is similar to an existing housing allocation site ref 95 Land North of Station Road. However the allocation does generally have better access to services and facilities within Heighington village which is within walking distance.	No	
LPR092g	Housing	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		H2 – Housing Allocations (strategic)		Object	The Draft Local Plan only includes 3 additional housing allocations, and it is understood that these sites are, at least in part, in the ownership of the Council. There is currently no evidence base documents outlining the Council's rationale for allocating these site over other options. One of the sites (417 - Land east of Maidendale) is currently allocated for employment use (Site 356 – Ingenium Parc), forming part of a wider employment allocation and adjoining Cummins, which is a major Darlington employer. The site is described in the current Local Plan as, "Site 365 – Ingenium Parc A prime industrial and commercial development site south of the Cummins Engine Factory on Yarm Road." Planning permission (LPA Ref: 25/01406/RM1) is currently being sought by Cummins to expand their premises on part of the same employment allocation, which includes increasing the amount of B2 floorspace, which is typically incompatible with residential areas. There is no supporting evidence that is available to view, that would support the deallocation of the employment land. Neither is there any consideration of how the proposed housing allocation would affect existing major employment use and the retained employment allocation, which has outline planning permission, including for B2 use. Considering that the current Local Plan only recently allocated the site as a key employment site, that it adjoins a major Darlington employer, and knowing that there are pending applications for major employment development on the wider site, we would query the justification and suitability of the residential allocation. Indeed, the available evidence and retained economic ambitions of the Council, would reinforce the need to retain the employment allocation. In addition, the Draft Local Plan retains the majority of allocations from the current Local Plan. Where allocations have not come forward since the adoption of the current Local Plan in 2022 the Council must demonstrate that these are	The Draft Local Plan only includes 3 additional housing allocations, and it is understood that these sites are, at least in part, in the ownership of the Council. There is currently no evidence base documents outlining the Council's rationale for allocating these site over other options. Concerns raised with housing allocation 417 Land east of Maidendale (former Ingenium Parc) given the adjacent Cummins Engine Factory is looking to expand (25/01406/RM1) and there is no evidence to support deallocation of the employment land. No consideration of impacts on the wider employment area. Questions the justification and suitability of the residential allocation.	Comments noted. Further evidence will be published at the reg 19 stage which will support the proposed housing allocations.	No	
LPR096	Housing	Jeremy Good	ELG Planning		Section			6. Housing	Object	It is considered that the Council should be looking to allocate additional housing land to deliver executive housing. In recent years Darlington has seen a greater level of demand for additional self-building and executive housing schemes. There is no reference within the Local Plan which would encourage the delivery of executive housing, nor does it seek to allocate suitable locations within the authority to deliver those properties. There are suitable locations within the authority to accommodate such schemes. Following the successful delivery of housing on the former Blackwell Grange site, the Council should be identifying opportunities to deliver suitable executive housing sites. Failure to provide such accommodation will lead to residents moving into neighbouring authorities where such provision is being made. It is considered that the delivery of high-quality, high-value residential developments, would support local economic growth and community needs and play a key role in attracting and retaining skilled workers. DBC should encourage the development of high-quality "executive" housing (such as lower density or specialized designs), to help attract new high earners and retain skilled talent within the area.	The Council should be looking to allocate additional housing land to deliver executive housing. Darlington has seen greater demand for self-building and executive housing schemes. No reference in the plan to encourage delivery of executive homes or allocate sites. Blackwell Grange given as an example. It would support local economic growth by attracting and retaining skilled workers.	The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet quantitative and qualitative housing needs. Policy H3 Housing Mix encourages an appropriate mix of housing in terms of types, sizes and tenures which would include executive style and larger homes. It is not considered necessary to allocate sites specifically for this type of housing which can also be difficult to define. Policy H4 also sets requirements on self-build and custom build housing.	No	
LPR102b	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Conisclliffe Road, Darlington, DL3 7EH	Policy		H2 – Housing Allocations (strategic)		Object	It is proposed to include 3 additional housing allocations, which include: •467 – Tees Grange (indicative yield of 89 dwellings) •468 – Kendrew Street Car Park Regeneration Area (indicative yield of 125 dwellings) •471 – Land east of Maidendale (former Ingenium Parc) (indicative yield of 420 dwellings) It is understood that these sites are, at least in part, in the ownership of the Council. Whilst these sites have been included, there is no supporting evidence that is able to be viewed, to help understand the rationale/justification for the allocations, and why they have been chosen over other sites (i.e. the site selection process). It is recognised that the Kendrew Street Car Regeneration Area (Site 468) is an adaptation of the current allocation/commitment, however Tees Grange (Site 467) would appear to be a constrained greenfield site with no planning permission or clear evidence to demonstrate its developability or deliverability. One of the sites (417 - Land east of Maidendale) is also currently allocated for employment use (Site 356 – Ingenium Parc), forming part of a wider employment allocation and adjoining Cummins, which is a major Darlington employer. Whilst this site has been included, there is no supporting evidence that is able to be viewed, to help understand the rationale/justification for the allocation, and why it has been chosen over other sites (i.e. the site selection process). The site is described in the current Local Plan as, "Site 365 – Ingenium Parc A prime industrial and commercial development site south of the Cummins Engine Factory on Yarm Road." Planning permission (LPA Ref: 25/01406/RM1) is currently being sought by Cummins to expand their premises on part of the same employment allocation, which includes increasing the amount of B2 floorspace, which is typically incompatible with residential areas.	The Draft Local Plan only includes 3 additional housing allocations, and it is understood that these sites are, at least in part, in the ownership of the Council. There is currently no evidence base documents outlining the Council's rationale for allocating these sites over other options. Concerns raised with housing allocation 417 Land east of Maidendale (former Ingenium Parc) given the adjacent Cummins Engine Factory is looking to expand (25/01406/RM1) and there is no evidence to support deallocation of the employment land. No consideration of impacts on the wider employment area. Questions the justification and suitability of the residential allocation.	Comments noted. Further evidence will be published at the reg 19 stage which will support the proposed housing allocations.	No	

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LPR104k	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621226	Policy		Policy H2: Housing Allocations (Strategic Policy)		Object	11.1 Taylor Wimpey is concerned with the Council's approach to site selection within the emerging Local Plan. The Plan relies almost exclusively on sites previously allocated in the adopted Local Plan, without demonstrating that reasonable alternatives have been properly considered or that this represents the most appropriate spatial strategy. In particular, the findings of the draft Housing and Economic Land Availability Assessment (HELAA), prepared following the recent call for sites, do not explain why a number of sites assessed as suitable, available and achievable have been excluded, including Berrymead Farm, Darlington, and also seems to exclude sites that should be considered to be suitable, available and achievable. 11.2 The allocation of only 11 sites to meet the Borough's housing requirement represents an overly narrow and inflexible approach to supply. When read alongside Policy SD3, which tightly constrains development beyond defined settlement boundaries, this strategy unduly limits the availability of alternative sites and reduces resilience should delivery on allocated sites stall or be delayed. This approach risks a lack of flexibility and choice in the housing land supply, contrary to the objectives of the 2024 National Planning Policy Framework. 11.3 As drafted, the Plan has not been demonstrated to be justified, having failed to adequately consider reasonable alternatives or to explain the rejection of otherwise deliverable sites, nor effective, given the reliance on a limited number of allocations and restrictive development boundaries. To ensure consistency with the tests of soundness, the Council should consider a broader range of sites to support a flexible, deliverable and responsive housing supply over the plan period, including Berrymead Farm, Darlington Justification 11.1 The reliance on a limited number of allocations (11 sites) to deliver the Borough's housing requirement represents a high-risk and inflexible strategy. This approach assumes that all allocated sites will come forward without delay; however, evidence from existing allocations demonstrates that delivery has already fallen behind anticipated trajectories. There is therefore a clear risk that future delays could undermine the effective delivery of housing over the plan period. 11.2 Empirical evidence highlights the importance of allowing for realistic lead-in times. Research by the Home Builders Federation identifies a minimum two-year lag between the granting of planning permission and first completions, noting that the standard three-year commencement period often reflects the time required to discharge pre-commencement conditions and resolve technical matters. Further industry research, by Chamberlain Walker/Barratts states that lead in times on average were as follows pre-application phase 1.2 to 2.1 years (including preparing for the planning application and due diligence, optioning, and promotion); planning application submission to consent – 0.5 to 0.8 years; planning	Taylor Wimpey is concerned with the approach to site selection in the emerging Local Plan. Reliance on previous allocationswith no evidence that alternatives have been considered or that this is th emost appropriate spatial strategy. Allocation of only 11 sites is a narrow and inflexible approach. SD3 also tightly constrains development within settlement limits which limits alternative sites if allocations are delayed. Concern with delivery estimates which appear to have already fallen behind anticipiated trajectories. There shoud be an up to date assessment of housing and economic needs. The Council should consider a broader range of sites to support a flexible, deliverable and responsive housing supply over the plan period, including land at Berrymean Farm (HELAA site ref 49) and Coniscliffe Road (HELAA site ref 85).	Comments noted. Further evidence will be published at the reg 19 stage which will support the proposed housing allocations. The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. With regards to the alternative sites put forward; site 49 was considered suitable, available and developable but not required to meet housing needs in this plan period. More centrally located sites have been allocated. Site 85 was not considered suitable as the site is essential for maintaining the openness, separation and individual identity of Low Coniscliffe from the Darlington Urban Area and Merrybent.	No	
LPR105k	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621228	Policy		H2 – Housing Allocations (strategic)		Object	Taylor Wimpey is concerned with the Council's approach to site selection within the emerging Local Plan. The Plan relies almost exclusively on sites previously allocated in the adopted Local Plan, without demonstrating that reasonable alternatives have been properly considered or that this represents the most appropriate spatial strategy. In particular, the findings of the draft Housing and Economic Land Availability Assessment (HELAA), prepared following the recent call for sites, do not explain why a number of sites assessed as suitable, available and achievable have been excluded and also seems to exclude sites that should be considered to be suitable, available and achievable, including Coniscliffe Road, Darlington. 11.2 The allocation of only 11 sites to meet the Borough's housing requirement represents an overly narrow and inflexible approach to supply. When read alongside Policy SD3, which tightly constrains development beyond defined settlement boundaries, this strategy unduly limits the availability of alternative sites and reduces resilience should delivery on allocated sites stall or be delayed. This approach risks a lack of flexibility and choice in the housing land supply, contrary to the objectives of the 2024 National Planning Policy Framework. 11.3 As drafted, the Plan has not been demonstrated to be justified, having failed to adequately consider reasonable alternatives or to explain the rejection of otherwise deliverable sites, nor effective, given the reliance on a limited number of allocations and restrictive development boundaries. To ensure consistency with the tests of soundness, the Council should consider a broader range of sites to support a flexible, deliverable and responsive housing supply over the plan period, including Coniscliffe Road, Darlington. The reliance on a limited number of allocations (11 sites) to deliver the Borough's housing requirement represents a high-risk and inflexible strategy. This approach assumes that all allocated sites will come forward without delay; however, evidence from existing allocations demonstrates that delivery has already fallen behind anticipated trajectories. There is therefore a clear risk that future delays could undermine the effective delivery of housing over the plan period. Empirical evidence highlights the importance of allowing for realistic lead-in times. Research by the Home Builders Federation identifies a minimum two-year lag between the granting of planning permission and first completions, noting that the standard three-year commencement period often reflects the time required to discharge pre-commencement conditions and resolve technical matters. Further industry research, by Chamberlain Walker/Barratts states that lead in times on average were as follows pre-application phase 1.2 to 2.1 years (including preparing for the planning application and due diligence, optioning, and promotion); planning application submission to consent – 0.5 to 0.8 years; planning consent to start on site, 1.7 years (21 months), Site build out start to completion 2.3 years (27 months). Lichfield's start to finish report highlights that for schemes more than 500 dwellings	See above	See above	No	
LPR107b	Housing	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, 01325469236, jeremy@elgplanning.co.uk	Policy		H2 - Housing Allocations (strategic)		Object	CityheartsupportstheinclusionofKendrewStreetCarParkRegenerationAreawithintheredraftedpolicy. Although the wording acknowledges that the suggested yield is indicative, we would suggest a change in the wording to make this clearer. It is also considered that it should be acknowledged that for certain sites within the urban area and closer to the town centre, greater flexibility should be adopted in relation to the introduction of complementary uses rather than focusing on purely residential developments. Amended wording is suggested below. The yield identified is for indicative purposes only and should not be treated as a maximum or minimum. The final number, mix, and form of development (including the incorporation of non-residential uses where appropriate) will be determined through the planning application process, having regard to site-specific circumstances, design considerations, viability, and market demand. In particular, for centrally located or regeneration sites, a flexible approach should be taken to support mixed-use development where it would enhance place-making and optimise the use of land. With respect to the flexibility of uses, it is acknowledged that further detail can be added to the appendix relating specifically to Kendrew Street Car Park which would negate the need for the second part of the above suggested change. With this in mind we would suggest the final sentence of the first paragraph be amended to read The site is allocated for residential-led mixed-use development, incorporating approximately 125 dwellings, and, where appropriate, complementary town centre uses such as office, care, and other supporting uses, where these would enhance the vitality, viability, and overall deliverability of the scheme.	Support for the inclusion of site 468 Kendrew Street Car Park Regeneration Area as a housing allocation within policy H2. Wording changes proposed to ensure the yield is indicative and that sites closer to the urban area and town centre may have a mix of uses and a flexible approach will be taken. Also suggested that flexibility of uses could instead be added to the allocation statement which would negate the need for changes to H2.	Comments noted. It is considered that it is already clear within policy H2 that yields are indicative. Additional wording would be acceptable for the allocation statement of site 468 to allow some flexibility in uses.	Yes	Update appendix B allocation statement for site 468 Kendrew Street Car Park with the suggested wording in first paragraph - <u>The site is proposed for allocation for mixed use development with an indicative yield of 125 dwellings, including compatible commercial development and potential for specialist housing.</u>
LPR113 & 114g	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		H2 – Housing Allocations (strategic)		Object	In line with their position on Policy H1, Bellway strongly object to the direction chosen by DBC in relation to its overarching housing strategy, including the approach set out in Policy H2. Policy H2 states that the land allocations required to meet the housing target are already provided for within the adopted plan, notwithstanding the extended plan period to 2042, and as such no additional large-scale housing allocations have been proposed. Stantec's analysis of the Housing Allocations highlights a significant reliance on a number of large strategic sites carried forward from the adopted plan which have yet to commence delivery. These include sites such as Burtree Garden Village (formerly the Greater Faverdale), Skerningham, and Land South of the Railway. In addition, Policy H2 relies on several allocated but uncommitted sites, which are assumed to deliver early in the plan period. Direct discussions between Stantec and DBC in the context of ongoing pre-application engagement have resulted in an understanding that DBC considers it can adequately evidence that the allocated sites included within the housing trajectory are likely to come forward within the Plan period. However, Bellway remain unconvinced that there is sufficient evidence to demonstrate the certainty of delivery across the full portfolio of allocations within the Draft Plan period. For example, Land South of Burtree Lane continues to be included within the Draft Plan trajectory, despite remaining undelivered due to ongoing issues associated with the provision of highway infrastructure. Given the failure of the adopted plan to secure the commencement of a substantial proportion of allocated housing sites, Bellway consider it essential that robust and proportionate evidence of deliverability is provided as part of the Draft Plan's evidence base. This is necessary to provide confidence that the proposed allocations strategy is sound and capable of delivering the intended level of housing growth.	Objection to the approach taken in policy H2. No additional large scale housing allocations have been proposed. Reliance on a number of large strategic sites carried forward from the adopted plan which have to commence delivery. Concerns regarding a lack of evidence around the delivery of sites across the allocations. A number of allocations have failed to commence development. A robust and proportionate evidence base of deliverability should be provided.	Comments noted. Further evidence will be published at the reg 19 stage which will support the proposed housing allocations and their deliverability. The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. Three additional housing allocations are proposed in the Draft Local Plan: site 467 Tees Grange, 468 Kendrew Street Car Park Regeneration Area and 471 Land east of Maindendale (former Ingenium Parc).	No	
LPR113 & 114j	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Section		H2 - Housing Allocations (strategic)	6. Housing	Object	Representation of the land North of Burtree Lane - see submitted document.	Alternative site proposed for allocation - site ref 446 Land North of Burtree Lane. See submission for background detail and supporting vision document. To read alongside the overarching representations to the Draft Plan consultation. Bellway do not believe that Darlington has a five year housing land supply (supporting assessment submitted). Adjacent to existing housing commitments and logically placed to deliver new homes (150 homes). Accompanying concept masterplan. No significant constraints and sustainably located. Located adjacent to existing commitments and allocations (Berrymead Farm, Burtree Lane, Burtree GV, Skerningham). The site is available, suitable and deliverable and would contribute towards the housing requirement for Darlington.	Comments noted. The site has been considered as suitable, available and developable for housing development in the draft HELAA site assessment. It is adjacent to existing commitments and appears to have few constraints that could be overcome by sensitive development. However, at this time there are more suitable sites available for allocation within the eixtsng main urban area which will meet housing needs. As such this site has not been proposed for allocation.	No	
LPR113 & 114v	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		H2 - Housing Allocations (strategic)	6. Housing	Object	Representation of the land High Beaumont - see submitted document.	Alternative site proposed for allocation - site ref 252 Land at High Beaumont Hill Farm. See submission for background detail and supporting vision document. To read alongside the overarching representations to the Draft Plan consultation. Bellway do not believe that Darlington has a five year housing land supply. The site is a logical and well connected opportunity for residential development (675 homes). Few constraints on site. The site has had recent approval for the installation of an underground water pipe main. Expected that the site will be available for residential development in 2029. It is the next stage of surrounding growth (Burtree Lane, Berrymead Farm, Skerningham and Burtree GV).	Comments noted. The site has been considered in the HELAA and the draft assessment classified the site as not suitable for development in the short term over the reviewed Local Plan period as it is currently distant from the urban area and its development limit including site allocations. There were also concerns with development on the north eastern part of the site as it forms part of the openness and separation of Coatham Mundeville from the expanding urban area.	No	
LPR115f	Housing	Emma Williams	Church Commisioners for England - Deloitte	Emma Williams, Deloitte,	Policy		H2 - Housing Allocations (strategic)		Neutral	Policy H2 identifies sites allocated for housing development to meet the housing requirements for the Borough. This continues to identify the Commissioners' land at Hall Farm, Branksome, as a housing-led urban extension. The Commissioners support the retention of this allocation within the updated Local Plan and confirm that the site remains available, deliverable and suitable with no constraints to development. Policy H2 identifies the indicative anticipated yield for proposed housing allocations. It is noted that the yield identified is for indicative purposes only and the final number of homes to be delivered on site will be determined by the planning application process. Hall Farm, Branksome, is allocated as an urban extension. Policy H2 Table 6.5 identifies an indicative site yield of 400 homes by 2042. This compares with the previous local plan identifying the site yield as 270 homes by 2036, and 180 homes after 2036, totalling 450 homes. A development partner for the site has been engaged in pre-application discussions with the Council, and a planning application will be submitted imminently for development of the site. This demonstrates the immediate deliverability of the site. The Commissioners support the revised yield and timescales for delivery in line with the revised Local Plan period.	Church Commissioners support the retention of site 100, Hall Farm, Branksome as a housing allocation and confirm that the site remains available, deliverable and suitable with no constraints to development. Noted that the yield identified is indicative and delivery of 400 units expected by 2042 which is supported. A development partner has been engaged and a planning application to be submitted imminently.	Comments noted.	No	

LPR121	Housing	Richard Morgan	IC Planning Ltd		Section		H2 - Housing Allocations (strategic)	6. Housing	Object	"No additional land has been proposed for housing allocation and instead existing allocations are being rolled forward. We believe the existing supply needs to be supplemented with additional sites that can be demonstrated to be suitable and deliverable to ensure an effective supply of housing land is maintained through the plan period and to distribute new housing to all areas where is can be supported. As a 'Service Village', Hurworth is expected to accommodate a reasonable level of development and this is essential to sustain its vitality but there is currently no land in Hurworth safeguarded for future housing development, with existing allocations already built out. Land to the south and east of Hurworth is heavily constrained by flood risk. HELAA Site Ref. 454 which we submitted to the Call for Sites is on the north west side of the village and represents the most appropriate location for growth that will effectively 'round off' this edge of the settlement. Its development would create a defensible village boundary without encroaching into the countryside any further than already exists to the south of the site. The site can accommodate a level of housing that will ensure the role of Hurworth as a 'Service Village' is maintained and the vitality and viability of existing local services and facilities will be adequately supported moving forward. The existing access can be made to adoptable standard and this can be demonstrated through the submission of further technical evidence. We therefore strongly encourage the Council to look at allocating additional housing land as part of the Local Plan Review and HELAA Site Ref. 454 specifically. We also believe further flexibly could be added to the housing strategy for the Local Plan by including a policy that allows non-allocated sites to be considered where they are closely related to the built up area of a settlement and can be demonstrated to be appropriate and deliverable and in accordance with all other development plan policies."	No additional land has been proposed for housing allocation and instead existing allocations are being rolled forward. Existing supply needs to be supplemented with additional sites that are suitable and deliverable to ensure an effective supply of housing land is maintained through the plan period and to distribute new housing to all areas where it can be supported. Concerns raised that no land is proposed for development in Hurworth. Existing allocations are already built out. HELAA site 454 Land West of Roundhill Road site 3 proposed for allocation. Positive aspects of the site referenced. Development will support the vitality and viability of the service village. The existing access can be made to adoptable standard which can be demonstrated through the submission of further technical evidence. Would encourage the Council to allocate additional housing land and specifically site 454. Comments also suggest including a policy that allows non-allocated sites to be considered where they are closely related to the built up area and are in accordance with all other development plan policies. This would add further flexibility.	The Council considers that a sufficient range of sites have been identified in the Draft Local Plan to meet housing needs. The approach taken is planning for larger scale development via significant extensions to the main urban area. This is supported in national planning policy. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. Three additional housing allocations are proposed in the Draft Local Plan: site 467 Tees Grange, 468 Kendrew Street Car Park Regeneration Area and 471 Land east of Maindendale (former Ingenium Parc). HELAA site 454 was not proposed for allocation as there were considered to be issues with access and more suitable sites are available within the main urban area. The Council is not pursuing a windfall sites type policy in the draft plan. There are allowances for sites to come forward beyond development limits related to exception sites and the windfall mechanism in policy H1.	No	
LPR 064 & 065i	Housing	Nick Pleasant	Stantec on behalf of Vistry		Policy		H3 – Housing Mix		N/A	Vistry broadly supports the principle of delivering a diverse and balanced mix of dwellings within new developments in order to meet the needs of a wide range of demographic groups. Vistry also accepts that the provision of accessible and adaptable dwellings (M4(2)) and wheelchair user dwellings (M4(3)) should be informed by a robust Local Housing Needs Assessment, which is properly evidenced and capable of being rigorously tested through the plan-making process. However, ongoing engagement with DBC has confirmed that the Local Housing Needs Assessment (LHNA) remains in draft form and has not yet been finalised or made publicly available. As such, this evidence which the proposed amendments to the Draft Plan policies has been based upon it has not been published alongside the Draft Plan. This is extremely disappointing. Vistry does not understand how stakeholders are expected to participate meaningfully in the consultation process when the evidence base underpinning relevant policies is neither finalised nor publicly available and will not be accessible until after the consultation has closed. Vistry would urge DBC to seriously consider the importance of properly evidencing the policies within the Draft Plan. Paragraph 32 of the NPPF makes clear that "The preparation and review of all policies should be underpinned by relevant and up to date evidence". When this evidence is absent it is not possible to appropriately assess whether the policies can be considered sound. See submitted attachment.	Broad support for the principle of delivering a diverse and balanced mix of dwellings within new developments in order to meet the needs of a wide range of demographic groups. Vistry also accepts that the provision of accessible and adaptable dwellings (M4(2)) and wheelchair user dwellings (M4(3)) should be informed by a robust Local Housing Needs Assessment, which is properly evidenced and capable of being rigorously tested through the plan-making process. Concerns raised that a LHNA is in draft form and not available. Stakeholders cannot meaningfully participate in the consultation process when evidence underpinning policies is not available. The NPPF makes clear that the preparation and review of all policies should be underpinned by relevant and up to date evidence (para 32).	Comments noted. A Local Housing Needs Assessment and evidence supporting the M4(2) and M4(3) requirements will be published prior to the next stage of plan preparation (Reg 19).	No	
LPR051h	Housing	Chris Martin	HBF		Policy		H3 Housing Mix		N/A	The HBF welcomes and supports that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment (LHNA, 2025), other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. It is also noted that the requirement for the percentage of new homes on development sites to be built to the enhanced M4(2) accessible and adaptable standard is proposed to increase from 45% to 57%, whilst those built to M4(3) wheelchair user standards has decreased from 9% to 8%. The supporting text highlights that these changes are justified through the LHNA. The LHNA does not appear to have been published on the Council's website, however irrespective of this, the Council will need to ensure that all the relevant PPG tests are met in this case (Reference ID: 56-007-20150327). This includes: •The likely future need for housing for older and disabled people (including wheelchair user dwellings). •The size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes). •The accessibility and adaptability of existing housing stock. •How needs vary across different housing tenures. •The overall impact on viability. In particular, the latter requirement will need to be addressed in a whole plan viability assessment. The Local Plan Review also adds a requirement to Policy H3 that all new homes should be de-signed to meet Nationally Described Space Standards (NDSS). NDSS is an optional technical standard and the Council will need to justify its inclusion, with the PPG requiring evidence in terms of need, viability and consideration of timing (ie. a suitable transitional period) (Reference ID: 56-020-20150327). The HBF is currently unaware that the Council has provided this evidence and until it has done so, the requirement for NDSS is unjustified.	Support that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment (LHNA, 2025), other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. Changes to the M4(2) and M4(3) requirements noted. LHNA not published. The Council will need to ensure that all relevant PPG tests are met for these requirements including the impact on viability. The inclusion of Nationally Described Space Standards will also need to be justified. The PPG requires evidence of need, viability and consideration of timing. The requirement for NDSS is currently unjustified.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR059 & 60e	Housing	Dominic Crowley	Lichfields		Policy		H3 – Housing Mix		N/A	Amendments to Policy H3 will require all new homes to meet the requirements of the Nationally Described Space Standards (NDSS). These are optional standards, with Footnote 51 of the NPPF clear that it may be used where the need for such a standard can be justified. We would welcome the opportunity to review the accompanying evidence justifying the local application of the NDSS in this respect, particularly with regard to Local Plan viability. Footnote 51 of the NPPF is also clear that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties. The Local Plan review seeks an uplift to the percentage of homes which must meet these requirements against those contained in the current Local Plan (an uplift from 45% to 54% of all new dwellings for M4(2) and from 8% to 9% for M4(3)). The updated supporting text for this policy directs us to the latest Local Housing Needs Assessment ('LHNA') (2025) for evidence of housing need of specific types in the Borough however this does not appear to be available for review. We would welcome the opportunity to review this document in the context of the requirements of NPPF Footnote 51.	Changes to policy H3 noted including the introduction of NDSS and alterations to the M4(2) and M4(3) requirements. Footnote 51 of the NPPF referenced which states NDSS may be used where the need for such a standard can be justified. Accessible and adaptable housing should also address an identified need for such properties. We would welcome the opportunity to review the accompanying evidence for these requirements.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and evidence supporting the NDSS.	No	
LPR067 & 68p	Housing	Georgina Cox	Gladman		Policy		H3 – Housing Mix		N/A	See submitted attachment. Gladman supports policy H3 and the flexible approach to housing mix which is proposed to be retained in the Local Plan Review. Alongside the Local Housing Needs Assessment produced in 2025, other local factors should be taken into account when assessing the housing mix including the site's location, surroundings and any physical constraints. The Draft Local Plan Review notes all new homes should be designed to meet Nationally Described Space Standards (NDSS). This is an optional standard and so the council will need to justify the reasoning for its inclusion while also including evidence of the terms of need, viability and consideration of timing to meet PPG requirements.	Gladman supports policy H3 and the flexible approach to housing mix which is proposed to be retained in the Local Plan Review. Alongside the Local Housing Needs Assessment produced in 2025, other local factors should be taken into account when assessing the housing mix including the site's location, surroundings and any physical constraints. Inclusion of Nationally Described Space Standards (NDSS) noted. The council will need to justify the reasoning for its inclusion along with providing evidence of need, viability and consideration of timing to meet PPG requirements.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published to support the inclusion of NDSS.	No	
LPR071j	Housing	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy		H3 – Housing Mix		N/A	Our client supports the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment (LHNA, 2025), other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. However, the increase in the M4(2) accessible and adaptable standard from 45% to 57%, along with the addition of the requirement that all new homes should be designed to meet Nationally Described Space Standards ('NDSS') will add significant policy requirements. No updated whole plan viability assessment has been provided to consider the implications of the additional requirements on the viability of housing delivery in Darlington. The Planning Practice Guidance requires evidence in terms of need, viability and consideration of timing (ie. a suitable transitional period) (Reference ID: 56-020-20150327) to justify the proposed additional policy requirements.	Our client supports the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment (LHNA, 2025), other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. Changes to the M4 (2) and M4(3) requirements noted along with the inclusion that all new homes should meet Nationally Described Space Standards (NDSS). PPG requires evidence in terms of need, viability and consideration of timing to justify the proposed additional policy requirements. No updated whole plan viability assessment has been provided to consider implications of the requirements.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR079	Housing	Rosie Tunnadine	Habinteg Housing Association		Policy		H3 – Housing Mix		Object	Habinteg strongly supports that the local plan includes accessibility design standards, specifically Building Regulations M4(2) and M4(3). We believe that 'Policy H3: Housing Mix' has the foundations of a strong policy that sets a high ambition for providing homes for older and disabled people and avoids ambiguity. The simple, robust language used alongside clear percentages leaves little room for doubt in the local authority's commitment to accessible and adaptable homes. The ambition is key in responding to our ageing population and providing suitable homes for disabled people. The 8% wheelchair user home target will significantly help to address the backlog of unmet need in Darlington. It acts on evidence presented in the Housing and Economic Development Needs Assessment which strengthens its justification. Mandating for 8% of new homes to be built to the M4(3) wheelchair user standards will generate significant social and economic value – by reducing reliance on social care, minimising accidents in the home and maximising the potential for disabled people to be economically active and take up employment. (See Habinteg's 2023 report with London School of Economics: Living not Existing) The benefits of M4(3) homes are plentiful, and amongst them, new homes that meet category M4(3) will deliver: •For a working age wheelchair user, the benefit of living in a wheelchair user home can be valued at around £94,000 over a 10 year period. •For a later years wheelchair user household (aged 65 and over), the benefit could be around £100,000 over a 10 year period. •For a household with a child who is a wheelchair user, the benefit of living in a suitable wheelchair user home could be around £67,000 over a 10 year period. •Removes or reduces the cost of care assistance in the home •Improves confidence, independence, and self esteem •Enables greater social inclusion and community participation •Reduction in trips and falls in the home. While we welcome the 8% target for wheelchair user housing (robustly supported by the HEDNA data), we are concerned by the decision to split the remaining provision between M4(1) and M4(2) standards. We strongly recommend that all new, non-wheelchair-accessible housing be built to the M4(2) Accessible and Adaptable standard. There is a common misunderstanding that M4(2) homes are "specialist" housing reserved solely for older or disabled people. This is incorrect. The Accessible and Adaptable standard provides a baseline for all residents. Anyone, regardless	Support for the inclusion of accessibility design standards in the policy. The simple and clear language of the policy is supported. Mandating for 8% of homes to be built to the M4(3) user standards will generate significant social and economic value. It will help to address the backlog of need in Darlington. Benefits of the standard are highlighted. Concerns with the decision to split the remaining provision between M4(1) and M4(2) standards. All new, non-wheelchair-accessible housing should be built to the M4(2) Accessible and Adaptable standard. Framing M4(2) as a specialist requirement rather than a universal necessity risks creating a future housing stock that is inherently exclusionary. Relying on M4(1) to meet the needs of the majority is a short-sighted strategy. Designing homes to the M4(2) standard at the point of construction is significantly more cost-effective than attempting to adapt a substandard property later. By ensuring all new homes are built to the M4(2) standard, the Council effectively future-proofs the local housing stock, mitigating the significant financial burden on individuals and public health budgets to retrofit older, incompatible properties.	Support and comments noted. Unfortunately, the technical standards for accessible and adaptable housing are required to address an identified need for such properties in line with the NPPF/NPPG. As such it is not possible to apply a requirement that all new non-wheelchair accessible homes, are built to the M4(2) standard.	No	

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LPR087m	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		H3 - Housing Mix		N/A	Draft Policy H 3 remains largely flexible in respect of the appropriate mix of housing types, sizes and tenures. Our Client supports this flexible approach and welcomes the Council's decision to retain wording that has regard to a site's location physical constraints, character and surrounding context. Notwithstanding this, it is noted that the individual criteria of Policy H 3 seeks to vary the percentage requirement for M4(2) and M4(3) compliant dwellings. Part (a) of Draft Policy H3 increases the existing requirement for M4(2) dwellings from 45% to 57%. While our Client does not, in principle, object to the provision of M4(2) dwellings as part of residential development, there is no relevant or up-to-date evidence provided, either within the Local Plan Review or elsewhere, to justify this increase. The inter alia text at the outset of the Policy refers to having regard to the most up-to-date LHNA, or other relevant evidence; however, this assessment, or any other supporting evidence, has not been published as part of the Local Plan Review. Simiarly, our Client notes reference within Paragraph 6.6.3 to the fact that Local Plan viability testing has not been undertaken at this stage. In the absence of this information, our Client is unable to comment on the soundness of Draft Policy H 3 at this time, nor its compliance with the 'Housing: Optional Technical Standards' PPG (Paragraph 007 Reference ID: 56-007-20150327), until such a time further information is made available. Additional inter alia text has also been introduced at the conclusion of Policy H 3, requiring mandatory compliance with the Nationally Described Space Standards ('NDSS'), as set out under Appendix F of the Local Plan Review document. The 'Housing: Optional Technical Standards' PPG (Paragraph 020 Reference ID: 56-020-20150327) requires local planning authorities to provide justification for requiring internal space standards, based on need, viability and timing. Firstly, and as previously noted, the Council has not demonstrated a need for mandatory NDSS compliance on the basis that the LHNA or any associated evidence informing this policy requirement has not been published for public viewing. As such, until the Council can demonstrate evidence for the mandated NDSS compliance, the draft Policy H 3 is not justified or positively prepared as required by the NPPF. Secondly, our Client also wishes to draw attention to the fact a Whole Plan Viability Assessment (WPVA) has not been prepared in support of the Local Plan Review Consultation. As a result, there has been no assessment of viability, as required by Planning Practice Guidance. Thirdly, and finally, draft Policy H 3 makes no provision for a transitional period, nor is there any evidence to indicate whether such transitional arrangements were cosidered and, if so, the reasons why they were no pursued. When these three matters are considered cumulatively, our Client considers that further works are required to be	Draft Policy H 3 remains largely flexible in respect of the appropriate mix of housing types, sizes and tenures. Support for the flexible approach and the decision to retain wording that has regard to a site's location physical constraints, character and surrounding context. Alterations to the M4 (2) and M4(3) standards noted however there is no relevant or up to date evidence provided to justify the changes. It is also highlighted that Local Plan viability testing has not been undertaken at this stage. Without this information it is not possible to comment on the soundness of policy H3. The introduction of the Nationally Described Space Standards is also noted. The PPG requires justification for these standards based on need, viability and timing. The evidence for this has not been published by the Council and as such policy H3 is not justified or positively prepared.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR092	Housing	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		H3 – Housing Mix		N/A	Miller Homes support the flexibility in Policy H3 in relation to housing mix, the wording of which has been carried over from the current Local Plan. It is noted that Policy H3 intends to introduce the requirement for all new houses to meet Nationally Described Space Standards (NDSS) as well as increasing the M4(2) requirement to 57% but reduce the M4(3) requirement to 8%. In terms of NDSS, PPG confirms (ref: Paragraph: 002 Reference ID: 56-002-20160519) that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area. It does not appear, at this stage, that Darlington have such evidence so the inclusions within the plan of such a requirement will need to be fully justified. The PPG also provides detailed guidance on the test that needs to be met for the accessible and adaptatble dwellings standards including: • the likely future need for housing for older and disabled people (including wheelchair user dwellings). • size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes). • the accessibility and adaptability of existing housing stock. • how needs vary across different housing tenures. • the overall impact on viability. Whilst there is reference in the Draft Local Plan Review to a LHNA report, this does not appear to have been published to enable review of the Council's evidence. There is also a requirement for the requirements to be considered as part of the Whole Plan Viability Assessment. This also does not appear to have been carried out or if it has, not made available for review.	Miller Homes support the flexibility in Policy H3 in relation to housing mix, the wording of which has been carried over from the current Local Plan. Introduction of Nationally Described Space Standards (NDSS) and alterations to M4(2) and M4(3) requirements noted. In terms of NDSS, PPG requires that evidence is provided around need to justify their inclusion. This evidence does not appear to be provided. PPG also sets out detailed guidance on the tests that need to be met for accessible and adaptable dwelling standards including need and impact on viability. A Local Housing Needs Assessment does not appear to have been published to enable review of the evidence. A whole plan viability assessment is also required but does not yet appear to have been undertaken.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR094d	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469240	Policy		Policy H 3 Housing Mix		N/A	Mandale Homes support the flexibility in Policy H 3 in relation to housing mix, the wording of which has been carried over from the current Local Plan. Policy H3 intends to introduce a requirement for all residential development to meet the Nationally Described Space Standards (NDSS), as well as increase the M4(2) requirement to 57% but reduce the M4(3) requirement to 8%. On NDSS, PPG confirms (ref: Paragraph: 002 Reference ID: 56-002-20160519) that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area. It does not appear, at this stage, that Darlington have such evidence so the inclusions within the plan of such a requirement will need to be fully justified. The PPG also provides detailed guidance on the tests for the accessible and adaptable dwellings standards. These include: •The likely future need for housing for older and disabled people (including wheelchair user dwellings); •The size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); •The accessibility and adaptability of existing housing stock; •How needs vary across different housing tenures; and •The overall impact on viability. Despite the Draft Local Plan Review referring to a Local Housing Needs Assessment (LHNA) report, it does not appear to have been published. Therefore, there has been no opportunity to scrutinise the Council's evidence. In addition, both NDSS and M4 requirements need to be considered as part of the Whole Plan Viability Assessment (WPVA), which again does not appear to have been carried out, or, if it has, it has not been made available for review. As a result, Mandale Homes reserve their position on the above matters until the LHNA and WPVA are available for scrutiny.	Mandale Homes support the flexibility in Policy H3 in relation to housing mix, the wording of which has been carried over from the current Local Plan. Introduction of Nationally Described Space Standards (NDSS) and alterations to M4(2) and M4(3) requirements noted. In terms of NDSS, PPG requires that evidence is provided around need to justify their inclusion. This evidence does not appear to be provided. PPG also sets out detailed guidance on the tests that need to be met for accessible and adaptable dwelling standards including need and impact on viability. A Local Housing Needs Assessment does not appear to have been published to enable review of the evidence. A whole plan viability assessment is also required but does not yet appear to have been undertaken.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR095e	Housing	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Hayfofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Policy		H3 - Housing Mix		Object	Draft Policy H3 is considered to be in accordance with the National Planning Policy Framework and largely retains the wording of the currently adopted Policy from the DLP, amended to reference the most up-to-date Local Housing Needs Assessment (LHNA). As referenced within Paragraph 6.4.2, the LHNA details that there will be an increasing demand in the future for specialist housing to meet the needs of the elderly and those with physical or learning disabilities. Our client is supportive of the provision of new homes following the standards outlined within Building Regulations Approved Document M: Volume 1, and the increase in the requirement of M4(2) increasing from 45% to 57%. However, a lack of justification has been provided for the decrease in M4(3) from 9% to 8%. Suggested Modification Based on the above, it is considered that the LHNA, through detailing the future need for specialist housing, should result in an increase to the requirement for M4(3), which would be reflected in the wording of Draft Policy H3. We would also note that the up to date LHNA has not been published alongside the draft DLP.	Draft policy H3 is considered to be in accordance with the NPPF and largely retains the wording of adopted policy. It is referenced in para 6.4.2 that there will be an increasing demand in the future for specialist housing to meet the needs of the elderly and those with physical or learning disabilities. Support given for increasing the M4(2) requirement from 45% to 57%. However, a lack of justification has been provided for the decrease in M4(3) from 9% to 8%. Based on the above, it is considered that the LHNA, through detailing the future need for specialist housing, should result in an increase to the requirement for M4(3), which would be reflected in the wording of Draft Policy H3. We would also note that the up to date LHNA has not been published alongside the draft DLP.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment. The NPPF sets out that policies for accessible and adaptable homes should address identified need. As such the policy requirement within policy H3 for M4(3) dwellings refects the latest evidence the Council has on need for these homes. It does not necessarily mean that the requirement will increase with every review of the policy. Needs may fluctuate over time.	No	
LPR104l	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621227	Policy		Policy H3: Housing Mix		N/A	12.1 Taylor Wimpey understand the principle of securing an appropriate mix of housing types and the retention of flexibility to respond to identified need and viability considerations. However, Taylor Wimpey has concerns that the evidence base underpinning the proposed approach has not been made available alongside the consultation document. In particular, the Local Housing Needs Assessment has not been published, and it is therefore unclear what evidence supports the proposed increase in requirements for accessible and adaptable homes. 12.2 Furthermore, no viability assessment has been provided to demonstrate that the proposed requirements can be viably delivered across the plan area. In addition, no evidence has been published to justify the introduction of the Nationally Described Space Standards or amendments to the accessibility standards. In the absence of proportionate and up-to-date evidence addressing need, viability and deliverability, the proposed policy requirements cannot be considered justified or effective, contrary to the requirements of the 2024 National Planning Policy Framework. Justification 12.3 Taylor Wimpey welcomes and supports that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment, other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. 12.4 Taylor Wimpey welcomes and supports that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment (LHNA, 2025), other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. 12.5 It is noted that the proportion of new homes required to meet the enhanced M4(2) accessible and adaptable standard is proposed to increase from 45% to 57%, while the proportion of M4(3) wheelchair user dwellings is proposed to decrease from 9% to 8%. The supporting text indicates that these changes are justified by the LHNA; however, the LHNA does not appear to have been published on the Council's website. Notwithstanding this, the Council will need to demonstrate full compliance with the relevant Planning Practice Guidance requirements (PPG Reference ID: 56-007-20150327). This includes consideration of the likely future need for housing for older and disabled people, including wheelchair user dwellings; the size, type, location and quality of dwellings needed to meet specifically evidenced needs; the accessibility and adaptability of the existing housing stock; how identified needs vary across different housing tenures; and the overall impact of the proposed standards on development viability. 12.6 In particular, the impacts on viability will need to be robustly assessed through a whole-plan viability assessment, in	Taylor Wimpey welcomes and supports that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment, other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. Alteration to the M4(2) and M4(3) requirements noted. A Local Housing Needs Assessment has not been published to justify the requirements. The Council will need to demonstrate compliance with the PPG requirements including future need and impacts on development viability. A whole plan viability assessment will also be required in line with the NPPF to ensure the plan is deliverable. Introduction of the Nationally Described Space Standards (NDSS) within the policy noted. PPG requires evidence of need, an assessment of impact on viability and consideration of transitional arrangements. Taylor Wimpey is not aware that the Council has published the necessary evidence to support NDSS. To address the above the Council should provide updated evidence to justify the policy approach or remove the requirements if these are unable to be justified through evidence.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	

LPR105l	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621229	Policy		H3 - Housing Mix		N/A	Taylor Wimpey understand the principle of securing an appropriate mix of housing types and the retention of flexibility to respond to identified need and viability considerations. However, Taylor Wimpey has concerns that the evidence base underpinning the proposed approach has not been made available alongside the consultation document. In particular, the Local Housing Needs Assessment has not been published, and it is therefore unclear what evidence supports the proposed increase in requirements for accessible and adaptable homes. 12.2 Furthermore, no viability assessment has been provided to demonstrate that the proposed requirements can be viably delivered across the plan area. In addition, no evidence has been published to justify the introduction of the Nationally Described Space Standards or amendments to the accessibility standards. In the absence of proportionate and up-to-date evidence addressing need, viability and deliverability, the proposed policy requirements cannot be considered justified or effective, contrary to the requirements of the 2024 National Planning Policy Framework. Taylor Wimpey welcomes and supports that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment, other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. 12.4 Taylor Wimpey welcomes and supports that the flexible approach to housing mix is proposed to be retained in the Local Plan Review, where alongside having regard to the Local Housing Needs Assessment (LHNA, 2025), other factors can be taken into account when assessing housing mix including site location, physical constraints, character and surrounding context. 12.5 It is noted that the proportion of new homes required to meet the enhanced M4(2) accessible and adaptable standard is proposed to increase from 45% to 57%, while the proportion of M4(3) wheelchair user dwellings is proposed to decrease from 9% to 8%. The supporting text indicates that these changes are justified by the LHNA; however, the LHNA does not appear to have been published on the Council's website. Notwithstanding this, the Council will need to demonstrate full compliance with the relevant Planning Practice Guidance requirements (PPG Reference ID: 56-007-20150327). This includes consideration of the likely future need for housing for older and disabled people, including wheelchair user dwellings; the size, type, location and quality of dwellings needed to meet specifically evidenced needs; the accessibility and adaptability of the existing housing stock; how identified needs vary across different housing tenures; and the overall impact of the proposed standards on development viability. 12.6 In particular, the impacts on viability will need to be robustly assessed through a whole-plan viability assessment, in accordance with the 2024 National Planning Policy Framework's requirement for plans to be deliverable.	See above	See above	No	
LPR107c	Housing	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, 01325469236, jeremy@elgplanning.co.uk	Policy		H3-Housing Mix		Object	Cityheart are supportive of the policy and the flexibility in determining a suitable mix based on the sites location, cophysical constraints, character and surrounding context. With respect to the wording of the application of M4(2) and M4(3) requirements Cityheart support the flexibility in acknowledging that achieving such standards can be dependant on site suitability and viability. In relation to the application of NDSS, it is suggested that the wording be amended to include a similar degree of flexibility to ensure delivery is not hampered by a blanket requirement to comply completely with NDSS. The suggested wording amendment of the last paragraph is set out below. will be expected to comply with the Nationally Described Space Standards unless it can be demonstrated that compliance would compromise the viability, deliverability, or optimal use of the site.	Cityheart are supportive of the policy and the flexibility in determining a suitable mix based on the sites location, cophysical constraints, character and surrounding context. With respect to the wording of the application of M4(2) and M4(3) requirements Cityheart support the flexibility in acknowledging that achieving such standards can be dependant on site suitability and viability.In relation to the application of NDSS, it is suggested that the wording be amended to include a similar degree of flexibility. The suggested wording amendment of the last paragraph is set out below. "...will be expected to comply with the Nationally Described Space Standards unless it can be demonstrated that compliance would compromise the viability, deliverability, or optimal use of the site."	Comments noted. Wording is considered appropriate. Viability testing will be undertaken for the Local Plan and a pragmatic approach will be taken via the application process, e.g. for conversions / change of use.	Yes	See suggested wording
LPR108	Housing	Chris smith	Skerningham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1RF 0191 2615685	Policy		H3 – Housing Mix		N/A	"In relation to Draft Policy H3 (Housing Mix), the Council are seeking to amend the requirements for the provision of Building Regulations Approved Document M: Volume 1 Category 2 and 3 homes. It is our understanding that the evidence supporting the Local Plan Review comprises a Call for Sites and Housing and Economic Land Availability Assessment (March 2025), a Local Green Space Designation Report (March 2026), and a Sustainability Appraisal (March 2026). On review of the evidence base, the only mention of technical standards is within a review of National Policy in the Appendix of the Sustainability Appraisal. There does not appear to be any evidence identifying a need to increase the requirement of dwellings to be built to M4(2) standards from 45% to 57%. This is an increase of c.23.5% which is considered to be significant given there is no clear evidence pointing to the need for the increase. Our client would welcome further dialogue from the Council in relation to the origin for the increased requirement."	Alterations to the M4(2) standard noted. There does not appear to be any evidence identifying a need to increase the requirement of dwellings to be built to M4(2) standards from 45% to 57%. This is an increase of c.23.5% which is considered to be significant given there is no clear evidence pointing to the need for the increase. We would welcome further dialogue with the Council in relation to the origin for the increased requirement.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment.	No	
LPR111 & 112d	Housing	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		H3 – Housing Mix		N/A	Our Client supports the retained flexibility afforded within Draft Policy H 3 in respect of acknowledging the need for consideration to be given to a site's location, physical constraints, character and surrounding context when identifying an appropriate housing mix. We acknowledge the revisions proposed to Draft Policy H 3, to amend the percentage requirement of dwellings required to comply with Building Regulations Approved M4(2) standards. Part (a) of Draft Policy H3 increases the existing requirement for M4(2) dwellings from 45% to 57%. Principally, our Client does not disagree with the need to provide M4(2) dwellings as part of residential development to ensure that new homes provide quality living environments for residents both now and in the future. However there is no evidence provided as part of, nor outside of, the Local Plan Review Regulation 18 consultation to evidence the proposed increase in M4(2) requirements for development proposals, set out in Policy H 3. Paragraph 6.4.5 of the supporting text to Draft Policy H 3 refers to a 2025 Local Housing Needs Assessment ('LHNA'), which appears to be the basis for the proposed revisions to the M4(2) requirements. This document has not been published as part of the Local Plan Review. Similarly, we note reference in Paragraph 6.6.3 to the fact that Local Plan viability testing has not been undertaken at this stage. As such, we cannot comment on the soundness of Draft Policy H 3 at this time nor its compliance with the 'Housing: Optional Technical Standards' PPG (Paragraph 007 Reference ID: 56-007-20150327) until further information is provided in this regard. Our Client reserves the right to comment further at the time when the 2025 LHNA, and any supporting evidence, is made available. Draft Policy H 3 also introduces an expectation that all new residential development proposals will comply with the Nationally Described Space Standards ('NDSS'), as set out under Appendix F of the Local Plan Review Regulation 18 document. The 'Housing: Optional Technical Standards' PPG (Paragraph 020 Reference ID: 56-020-20150327) requires local planning authorities to provide justification for requiring internal space standards, based on need, viability and timing. To reiterate, the Council has not demonstrated a 'need' for mandatory NDSS compliance on the basis that the 2025 LHNA or any associated evidence informing this policy requirement has not been made publicly available at the time of writing. As such, until the Council can demonstrate evidence for the mandated NDSS compliance, there is no evidence that Draft Policy H 3 is justified or positively prepared as required by the NPPF. Again, it should be noted that a Whole Plan Viability Assessment has not been prepared in support of the Local Plan	Barratt David Wilson Homes support the retained flexibility afforded within Draft Policy H 3 in respect of acknowledging the need for consideration to be given to a site's location, physical constraints, character and surrounding context when identifying an appropriate housing mix. Alterations to the M4(2) and M4(3) requirements noted. In principle agrees with the requirement to provide M4(2) standard dwellings. However there is no evidence available to support the increase in the M4(2) requirement. Local Housing Needs Assessment mentioned but not published. Introduction of Nationally Described Space Standards also noted. PPG requires justification around need, viability and timing which has not been provided. Whole plan viability assessment has not be prepared to test the requirements within policy H3.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR113 & 114i	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		H3 – Housing Mix		N/A	Bellway broadly supports the principle of delivering a diverse and balanced mix of dwellings within new developments in order to meet the needs of a wide range of demographic groups. Bellway also accepts that the provision of accessible and adaptable dwellings (M4(2)) and wheelchair user dwellings (M4(3)) should be informed by a robust Local Housing Needs Assessment, which is properly evidenced and capable of being rigorously tested through the plan-making process. However, ongoing engagement with DBC has confirmed that the Local Housing Needs Assessment (LHNA) remains in draft form and has not yet been finalised or made publicly available. As such, this evidence which the proposed amendments to the Draft Plan policies has been based upon it has not been published alongside the Draft Plan. This is extremely disappointing. Bellway does not understand how stakeholders are expected to participate meaningfully in the consultation process when the evidence base underpinning relevant policies is neither finalised nor publicly available and will not be accessible until after the consultation has closed. Bellway would urge DBC to seriously consider the importance of properly evidencing the policies within the Draft Plan. Paragraph 32 of the NPPF makes clear that "The preparation and review of all policies should be underpinned by relevant and up to date evidence". When this evidence is absent it is not possible to appropriately assess whether the policies can be considered sound.	Bellway broadly supports the principle of delivering a diverse and balanced mix of dwellings within new developments in order to meet the needs of a wide range of demographic groups. Bellway also accepts that the provision of accessible and adaptable dwellings (M4(2)) and wheelchair user dwellings (M4(3)) should be informed by a robust Local Housing Needs Assessment, which is properly evidenced and capable of being rigorously tested through the plan-making process. The LHNA has not been published alongside the Draft Plan. When this evidence is absent it is not possible to appropriately assess whether the policies can be considered sound.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	
LPR116b	Housing	Jack Conroy	Tivlot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		H3 – Housing Mix		N/A	Part a. of Draft Policy H3 increases the existing requirement for M4(2) dwellings from 45% to 57%. However, there is no evidence provided within the Regulation 18 document to justify this increase, nor has separate evidence base documentation been made available by the Council in this regard. The justification for the proposed increase in M4(2) compliance is therefore unclear at this time in the absence of evidence regarding the likely future need for older and disabled people's housing, accessibility and adaptability of existing housing stock, how needs vary across housing tenures and overall impacts on viability. Reference is made to a Local Housing Needs Assessment ('LHNA') within the Regulation 18 document, however this document has not been published as part of the LPR process. Similarly, we note reference in Paragraph 6.6.3 to the fact that Local Plan viability testing has not been undertaken at this stage. As such, we cannot comment on the soundness of Draft Policy H3 at this time, nor its compliance with the 'Housing: Optional Technical Standards' PPG (Paragraph 007 Reference ID: 56-007-20150327) until such information is provided. We also note the inclusion of mandatory compliance with the Nationally Described Space Standards ('NDSS') inserted in Draft Policy H3 (with Appendix F confirming the standards). The 'Housing: Optional Technical Standards' PPG (Paragraph 020 Reference ID: 56-020-20150327) requires local planning authorities to provide justification for requiring internal space standards, based on need, viability and timing. Taking each point in turn, the Council has not demonstrated a 'need' for mandatory NDSS compliance on the basis that the LHNA and/or associated evidence informing this policy requirement has not been made publicly available. Until such a time that such evidence is made available, the mandated NDSS compliance within Draft Policy H3 is not justified in this regard. There is also no evidence demonstrating that potential implications of NDSS compliance upon land supply have been considered, as a Whole Plan Viability Assessment has not been prepared in support of the LPR Regulation 18 consultation. As such, 'viability' cannot yet been accounted for in the preparation of the policy wording, conflicting with PPG requirements. Finally, turning to 'timing', there is no transitional period included within Draft Policy H3, nor is there any evidence to confirm whether such transitional arrangements were considered, and if so why they were discounted. Our Client reserves the right to comment further on Draft Policy H3 at a later stage in the LPR process, subject to evidence (i.e. the LHNA and/or associated evidence) being made publicly available.	Alterations proposed to the M4(2) requirements noted. However, there is no evidence to justify this increase. Supporting evidence required in line with the PPG relating to future need, accessibility and adaptability of exitsing stock, how needs vary across tenures and impacts on viability. No Local Housing Needs Assessment or Whole Plan Viability published. Inclusion of Nationally Described Space Standards noted. No evidence published in relation to need, viability and timing as required by the PPG.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No	

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LPR115a	Housing	Emma Williams	Church Commissioners for England - Deloitte	Emma Williams, Deloitte,	Policy		H3 - Housing Mix		Object	The Commissioners consider the proposed increase in requirement for the percentage of homes required to meet accessible and adaptable dwelling standards (Category 3) from 45% to 57% could impact viability of developments across the borough and should be fully analysed through a viability appraisal. Without robust, publicly available evidence, such as an updated Local Housing Needs Assessment and comprehensive viability testing, it is difficult to ascertain the justification and soundness of this increase. Combined with other proposed policy changes that also increase development costs, the Council should carefully assess the cumulative impact of these policy changes on the deliverability of housing sites and provide necessary evidence to support this policy or reconsider its proposed amendments to ensure the policy is positively prepared and justified in accordance with the NPPF. The Commissioners therefore suggest that the Council undertakes a comprehensive viability assessment of the proposed increase in accessible and adaptable dwelling standards or reconsiders its proposed amendments to Policy H4.	The Commissioners consider that the proposed increase in the M4(2) standard for accessible and adaptable homes from 45% to 57% could impact on viability and should be fully analysed through a viability appraisal. Without available evidence shuch as a Local Housing Needs Assessment and comprehensive viability testing it is difficult to ascertain the justification and soundness of the increase. The Council should also carefully assess the cumulative impact of other policy changes on the deliverability of housing sites.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR102c	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy		H3 - Housing Mix		N/A	It is noted that section 6.6.3 of the draft Local Plan Review states "Local Plan viability testing will take place at the next stage of plan making and will inform the publication draft. This will examine the impact of the affordable housing requirement on the viability of housing development across the borough. If necessary, the percentages will be altered within policy H5 to ensure the requires are viable". It is essential that the plan fully considers viability in forming the policy requirements. Considering the impacts of the current Local Plan Review for the Borough, which includes extending the plan period by a further 6 years, we have concerns that viability does not appear to have been a factor in the current draft version of the Local Plan. This is particularly so when several changes have been made to the housing trajectory, which include an increase to delivery rates and site capacities. We therefore reserve our right to comment in further detail on this critical matter at the next stage of consultation.	It is noted that Local Plan viability testing will take place at the next stage of plan making. It is essential that the plan fully considers viability in forming the policy requirements. We have concerns that viability does not appear to have been a factor in the current draft version of the Local Plan. This is particularly so when several changes have been made to the housing trajectory, which include an increase to delivery rates and site capacities. We therefore reserve our right to comment in further detail on this critical matter at the next stage of consultation.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR123i		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	Burtree Employment Park (Policy E2)	H3 - Housing Mix		N/A	It is noted that affordable housing requirements remain at 20% for Brinkburn and Faverdale, with proposed changes to the tenure split. Changes are also proposed to the number of accessible dwellings within a housing mix (category 2 and 3 requirements) and new requirements for 1% of homes to be self or custom build. This is based on a referenced Local Housing Needs Assessment (LHNA) dated 2025. HLL/HE reserve the right to comment further on these matters following the publication of the associated evidence base. Site suitability and viability is a consideration on policies H3 and H5 and could also be referenced in H4.	It is noted that affordable housing requirements remain at 20% for Brinkburn and Faverdale, with proposed changes to the tenure split. Changes are also proposed to the number of accessible dwellings within a housing mix (category 2 and 3 requirements) and new requirements for 1% of homes to be self or custom build. This is based on a referenced Local Housing Needs Assessment (LHNA) dated 2025. HLL/HE reserve the right to comment further on these matters following the publication of the associated evidence base. Site suitability and viability is a consideration on policies H3 and H5 and could also be referenced in H4.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR123i		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	Burtree Employment Park (Policy E2)	H4 - Self and Custom Build Housing		N/A	It is noted that affordable housing requirements remain at 20% for Brinkburn and Faverdale, with proposed changes to the tenure split. Changes are also proposed to the number of accessible dwellings within a housing mix (category 2 and 3 requirements) and new requirements for 1% of homes to be self or custom build. This is based on a referenced Local Housing Needs Assessment (LHNA) dated 2025. HLL/HE reserve the right to comment further on these matters following the publication of the associated evidence base. Site suitability and viability is a consideration on policies H3 and H5 and could also be referenced in H4.	It is noted that affordable housing requirements remain at 20% for Brinkburn and Faverdale, with proposed changes to the tenure split. Changes are also proposed to the number of accessible dwellings within a housing mix (category 2 and 3 requirements) and new requirements for 1% of homes to be self or custom build. This is based on a referenced Local Housing Needs Assessment (LHNA) dated 2025. HLL/HE reserve the right to comment further on these matters following the publication of the associated evidence base. Site suitability and viability is a consideration on policies H3 and H5 and could also be referenced in H4.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. The site size threshold in policy H4 is to be increased to 500 units. This should mitigate any issues with site suitability and result in a more appropriate number of self/custom build units on a development site. The viability of self and custom build has also been tested and shown to not have significant implications for deliverability. As such no other changes are proposed to the policy.	Yes	Increase site threshold within policy H4 to 500 dwellings or more.
LPR051i	Housing	Chris Martin	HBF		Policy		H4 - Self build and custom build housing		Object	Policy H4 seeks to require that on sites of 150 dwellings or more, that 1% of the housing plots should be made available as self-build or custom build plots. Whilst the HBF considers that plans should have policies in place to encourage and support the development of self-build and custom build homes on a general basis, it does not consider that there is adequate evidence to support a set percentage from development sites. Such evidence comes in the form of the number of individuals on the Council's self-build and custom build register. Whilst this number has not been provided, the supporting text to the policy outlines that the number is 'limited' and that the Council is intending to require a percentage on larger residential sites in order to boost the demand for self-build and custom build development. The HBF considers this approach to be flawed given that there is no evidence of any latent demand for such products and it doesn't necessarily follow that boosting the supply of such plots will automatically then boost demand, indeed, this is pure speculation that has been unsubstanti-ated by the Council. The HBF considers that such an onerous requirement of developers of larger sites is more likely to frustrate delivery of new homes by having to accommodate plots for which there is no proven demand. Even leaving this aside, it is considered unlikely that the provision of such plots on new housing developments can be coordinated with the development of a wider site. At any one time, there are often multiple contractors and large machinery operating on-site and therefore from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. For self-build in particular, the HBF also notes that many would prefer not to be on a large residential development. The HBF considers that in light of this, that the policy should be amended so that only the first sentence of the policy remains. That is to say, the policy should simply read: "To improve choice and variety of new housing, proposals for self-build and custom build homes that comply with other policies in this plan will be supported."	There is insufficient evidence to support a percentage requirement of self-build or custom build on development sites of 150 dwellings or more. Evidence comes from the number of individuals on the Council's self-build and custom build register. Whilst this number has not been provided, the supporting text to the policy outlines that the number is 'limited' and that the Council is intending to require a percentage on larger residential sites in order to boost the demand for self-build and custom build development. This approach is flawed and increasing supply will not necessarily boost demand. Concerns raised with the practicalities of delivering self/custom build on large sites with multiple contractors, large machinery operating etc. Self-build often prefer not to be on a large residential developments. Only the first sentence of the policy should remain.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19). To mitigate potential issues around the practicalities of delivering self build and custom build it is proposed to increase the site threshold to 500 dwellings within the policy. This will also result in a more suitable number of self/custom build units on sites.	Yes	Increase site threshold within policy H4 to 500 dwellings or more.
LPR059 & 60f	Housing			Dominic Crowley Lichfields, St Nicholas Building, Nicholas Street, NE1 1RF	Policy		H4 – Self-Build and Custom Build Housing		Object	Policy H4 introduces a requirement for 1% of housing plots on sites of 150 dwellings or more to be made available as self-build or custom-build plots, to meet the demand identified on the Council's self-build register. Hallam Land wish to raise concerns regarding the wording of this policy as it is considered unduly onerous in its requirement and could delay the delivery of much-needed new homes through its adoption. These concerns are further reinforced by the supporting text to this policy which is explicit in its statement that whilst there has been some demand for self-build plots in Darlington, this is "limited" (Local Plan review paragraph 6.5.1). Whilst Hallam Land support the principle of meeting self-build and custom build demand, the current proposed wording is not considered to be justified. We recommend that the wording be reviewed to ensure sufficient flexibility is embedded in the policy wording to ensure the delivery of self and custom build homes does not frustrate the delivery of major residential development sites.	Concerns regarding the wording of the policy and the introduction of a requirement that 1% of housing plots on sites of 150 dwellings or more should be made available for self-build or custom build. Concern with the supporting text refering to some demand but this is 'limited'. Current proposed wording is not justified and should be reviewed.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	
LPR064 & 065t	Housing	Nick Pleasant	Stantec on behalf of Vistry		Policy		H4 - Self Build and Custom Build Housing		Object	Vistry supports the principle of widening housing choice, where it is justified and supported by robust evidence. However, the policy relies on evidence from the LHNA which remains in draft form and has not been published alongside the Draft Plan. As such, it is not possible to assess whether the requirements for sites of in excess of 150 dwellings to provide 1% of plots as self-build or custom build plots is justified or proportionate. Paragraph 6.5.1 of the supporting text acknowledges that demand for self-build plots within the Borough is limited. Therefore, Vistry fails to see how Policy H4 can be justified in introducing a blanket requirement in the absence of clear evidence demonstrating sufficient demand. This approach will place unnecessary and ineffective requirements on larger developments. Vistry therefore reserves the right to revisit Policy H4 once the Local Housing Needs Assessment has been published, in order to fully assess the policy's soundness in the context set out above. See submitted attachment.	Concerns regarding the wording of the policy and the introduction of a requirement that 1% of housing plots on sites of 150 dwellings or more should be made available for self-build or custom build. Supporting evidence has not been published in a Local Housing Needs Assessment as such it is not possible to assess if the requirement is justified or proportionate. Concern that the supporting text references that there is 'limited' demand. Vistry therefore fails to see how policy H4 is justified.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	
LPR067 & 68g	Housing	Georgina Cox	Gladman		Policy		H4 – Self-Build and Custom Build Housing		Object	Gladman does not support a set percentage of self-build plots on schemes of 150 or more dwellings. The council has a self-build and custom build register where evidence should be derived from the number of individuals on the register. Otherwise, self-build plots will be accommodated potentially when there is no demand for them.	Gladman does not support a set percentage of self-build plots on schemes of 150 or more dwellings. The council has a self-build and custom build register where evidence should be derived from the number of individuals on the register. Otherwise, self-build plots will be accommodated potentially when there is no demand for them.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	
LPR071k	Housing	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy		H4 – Self-Build and Custom Build Housing		Object	Policy H4 seeks to require that on sites of 150 dwellings or more, that 1% of the housing plots should be made available as self-build or custom build plots. Our client objects to the requirement for the onsite provision of this type of product and considered unlikely that the provision of such plots on new housing developments can be coordinated with the development of a wider site. At any one time, there are often multiple sub-contractors and large machinery operating on-site and therefore from both a practical and health and safety perspective the development of single plots by individuals operating alongside this construction activity is considered to be very problematic. We also note that in the supporting text to the policy that demand is 'limited'. Given that there is no evidence of any latent demand for such products, this is an onerous requirement for developers of larger sites, and it is more likely to frustrate delivery of new homes by having to accommodate plots for which there is no proven demand. Our client considers that the policy should either be removed or be amended so that only the first sentence of the policy remains: "To improve choice and variety of new housing, proposals for self-build and custom build homes that comply with other policies in this plan will be supported."	Objection to the requirement for the onsite provision of 1% of housing plots being made available for self or custom build on sites of 150 dwellings of more. It is unlikely that the provision of such plots on new housing developments can be coordinated with the development of a wider site. Practical health and safety concerns with large residential development. Concerns with the supporting text describing demand as 'limited'. The policy should be either removed or amended so that only the first sentence of the policy remains.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19). To mitigate potential issues around the practicalities of delivering self build and custom build it is proposed to increase the site threshold to 500 dwellings within the policy. This will also result in a more suitable number of self/custom build units on sites.	Yes	Increase site threshold within policy H4 to 500 dwellings or more.
LPR087n	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		H4 - Self and Custom Build Housing		Object	It is recognised that draft Policy H 4 is a newly developed policy that elaborates from the text previously included at the end of adopted Policy H 4. Draft Policy H 4 sets out a requirement that "on sites of 150 dwellings or more at least 1% of the housing plots should be made available as self-build or custom build plots to meet the demand identified on the Council's self-build register". As previously outlined by our Client at earlier stages of these representations, there has been no evidence published to support the Local Plan Review, including a LHNA or the referred to Council's self-build register. As such, there is no justified or evidenced rationale to support the provision of 1% of self-build or custom plots. Notwithstanding the absence of evidence to support the delivery of 1% self-build plots on any development site, our Client also questions how the Council has arrived at a trigger threshold of 150 dwellings. Again, no evidence has been provided to demonstrate whether alternative development thresholds would be more appropriate. Taking indicative yields on allocated sites to be delivered within the Plan period at draft Policy H 2, this would equate to the minimum delivery of 46 self-build or custom homes. Supporting text at 6.5.1 then states "there is some demand for self-build plots but this is limited". As such, the policy would seemingly deliver more self-build plots than required. In light of the above, our Client proposes that the requirement for 1% self-build or custom dwellings on residential schemes exceeding 150 units is removed. If the Council was minded to retain a policy on self-build / custom dwellings, then this must be worded so that it is only encouraged and caveat that it is based on evidence of both viability and demand.	There has been no evidence published to support the Local Plan Review, including a LHNA or the referred to Council's self-build register. As such, there is no justified or evidenced rationale to support the provision of 1% of self-build or custom plots. Questioned how the Council has arrived at a trigger threshold of 150 dwellings. No evidence provided to demonstrate if alternatives are more appropriate. Concerns raised that the housing allocations proposed would deliver 46 self-build or custom homes yet supporting text describes the demand as limited. Suggested that the requirement for 1% self/custom build on schemes exceeding 150 units is removed. Alternatively a policy could be retained if it encouraged this type of housing and sould be based on evidence of both viability and demand.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	

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LPR094e	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469241	Policy		Policy H 4 Self Build and Custom Build Housing		Object	To confirm, Mandale Homes are supportive of the first line of the policy, which states: 'To improve choice and variety of new housing, proposals for self-build and custom build homes that comply with other policies in this plan will be supported.' Mandale Homes also welcome the recognition, at new supporting paragraph 6.5.1, that: 'The Council are however keen to widen opportunities for people to build their own homes as this is an important element of boosting housing supply and meeting housing aspirations.' However, the proposed policy approach to increasing opportunities for self and custom build housing is considered flawed; specifically, the requirement for 1% of plots made available for self or custom-build properties on sites comprising of 150no. dwellings or more. Moreover, having this requirement forced upon developers could impact on site viability by reducing the amount of the site that is available for market housing. There are also concerns over the practicalities of constructing self or custom-build housing within a site that is otherwise being developed by a volume house builder, and it is doubtful whether people wishing to develop their own home would actually want to live within a large estate. It is the view of Mandale Homes that there is greater demand for self and custom build housing in the Borough than indicated by the existing Custom and Self-Build Register, and that the fee to join will invariably have deterred many of those interested from joining. As a result, to widen opportunities the Council should be looking to support self and custom build housing on some small sites in suitable locations. It is for this reason that Mandale Homes are supportive of the first line of the policy, as confirmed above. Nevertheless, it is believed that the supported policy wording should be supplemented as follows: 'To improve choice and variety of new housing, proposals for self-build and custom build homes that comply with other policies in this plan will be supported, including on suitable sites directly adjacent to development limits.'	The proposed policy approach to increasing opportunities for self and custom build housing is considered flawed; specifically, the requirement for 1% of plots made available for self or custom-build properties on sites comprising of 150no. dwellings or more. Concerns regarding impact on site viability, practicalities of construction and whether people wishing to build their own home would want to do so on a large estate. To widen opportunities the Council should be looking to support self and custom build housing on some small sites in suitable locations. Support for the first line of the policy. It is believed that the supported policy wording should be supplemented as follows: 'To improve choice and variety of new housing, proposals for self-build and custom build homes that comply with other policies in this plan will be supported, including on suitable sites directly adjacent to development limits.' The above change is sought based on Mandale's experience of popular self and custom build sites, which are often located adjacent to urban areas and villages.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19). To mitigate potential issues around the practicalities of delivering self build and custom build it is proposed to increase the site threshold to 500 dwellings within the policy. This will also result in a more suitable number of self/custom build units on sites.	Yes	Increase site threshold within policy H4 to 500 dwellings or more.
LPR104m	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621228	Policy		Policy H4: Self-Build and Custom Build Housing		Object	13.1 Taylor Wimpey is concerned that there is no robust evidence to justify the introduction of a fixed percentage requirement for self-build and custom build dwellings on residential sites of 150 homes or more, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified and based on proportionate evidence. Justification 13.2 Policy H4 proposes to require that 1% of plots on residential sites of 150 dwellings or more are made available for self-build or custom build housing. While Taylor Wimpey supports the inclusion of policy measures to encourage and facilitate self-build and custom build housing in principle, it is not considered that there is sufficient evidence to justify the imposition of a fixed percentage requirement on larger development sites. 13.3 The evidential basis for such a requirement should be derived primarily from the level of demonstrable demand recorded on the Council's self-build and custom housebuilding register. While specific figures have not been published, the supporting text acknowledges that demand is currently limited. In these circumstances, the introduction of a mandatory percentage requirement appears to be predicated on the assumption that increasing supply will stimulate demand. Taylor Wimpey considers that this approach is speculative and is not supported by robust evidence, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified and based on proportionate evidence. 13.4 Moreover, the requirement of a fixed percentage risks undermining residential delivery on larger sites by obliging developers to accommodate plots for which there is no proven market demand. This could delay site build-out rates and adversely affect overall housing delivery, conflicting with the Framework's overarching objective of significantly boosting the supply of homes. 13.5 There are also practical and deliverability considerations. The integration of individual self-build plots within large, active construction sites raises logistical and health and safety challenges, particularly where multiple contractors and heavy machinery are operating concurrently. In addition, there is limited evidence to demonstrate that prospective self-builders would typically wish to develop individual plots within the context of large-scale residential developments. 13.6 In light of the above, Taylor Wimpey considers that Policy H4 should be amended so that it operates as a supportive and enabling policy, rather than imposing a mandatory percentage requirement. This would better reflect the 2024 National Planning Policy Framework's emphasis on flexibility, deliverability and proportionate, evidence-based plan-making. Proposed Approach	Concerns that there is no robust evidence to justify the introduction of a fixed percentage requirement for self-build and custom build dwellings on residential sites of 150 homes or more, contrary to the 2024 NPPF's requirement for policies to be justified and based on proportionate evidence. The evidence should be based on numbers registered on the Council's self-build and custom build register. These figures have not been published and the supporting text describes that demand is currently limited. Concerns with the approach of increasing supply to stimulate demand. This could undermind residential delivery on larger sites by requiring developers to accommodate plots where there is no demand. There are practical considerations for large construction sites and this requirement could cause logistical and health and safety challenges. Limited evidence that self-builders wish to develop on large scale developments. Policy H4 should be amended so that it operates as a supportive and enabling policy rather than imposing a percentage requirement.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19). To mitigate potential issues around the practicalities of delivering self build and custom build it is proposed to increase the site threshold to 500 dwellings within the policy. This will also result in a more suitable number of self/custom build units on sites.	Yes	Increase site threshold within policy H4 to 500 dwellings or more.
LPR105m	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621230	Policy		H4 – Self build and custom build housing		Object	Taylor Wimpey is concerned that there is no robust evidence to justify the introduction of a fixed percentage requirement for self-build and custom build dwellings on residential sites of 150 homes or more, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified and based on proportionate evidence. Policy H4 proposes to require that 1% of plots on residential sites of 150 dwellings or more are made available for self-build or custom build housing. While Taylor Wimpey supports the inclusion of policy measures to encourage and facilitate self-build and custom build housing in principle, it is not considered that there is sufficient evidence to justify the imposition of a fixed percentage requirement on larger development sites. 13.3 The evidential basis for such a requirement should be derived primarily from the level of demonstrable demand recorded on the Council's self-build and custom housebuilding register. While specific figures have not been published, the supporting text acknowledges that demand is currently limited. In these circumstances, the introduction of a mandatory percentage requirement appears to be predicated on the assumption that increasing supply will stimulate demand. Taylor Wimpey considers that this approach is speculative and is not supported by robust evidence, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified and based on proportionate evidence. 13.4 Moreover, the requirement of a fixed percentage risks undermining residential delivery on larger sites by obliging developers to accommodate plots for which there is no proven market demand. This could delay site build-out rates and adversely affect overall housing delivery, conflicting with the Framework's overarching objective of significantly boosting the supply of homes. 13.5 There are also practical and deliverability considerations. The integration of individual self-build plots within large, active construction sites raises logistical and health and safety challenges, particularly where multiple contractors and heavy machinery are operating concurrently. In addition, there is limited evidence to demonstrate that prospective self-builders would typically wish to develop individual plots within the context of large-scale residential developments. 13.6 In light of the above, Taylor Wimpey considers that Policy H4 should be amended so that it operates as a supportive and enabling policy, rather than imposing a mandatory percentage requirement. This would better reflect the 2024 National Planning Policy Framework's emphasis on flexibility, deliverability and proportionate, evidence-based plan-making. To address the comments, the following approach is proposed: • Policy is amended to reflect only a supportive policy position.	See response to comment 104m above.	See response to comment 104m above.	Yes	See response to comment 104m above.
LPR108a	Housing	Chris smith	Skerningham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1RF 0191 2615685	Policy		H4 – Self-Build and Custom Build Housing		Object	Policy H4 of the Local Plan Review seeks to introduce a requirement whereby on sites of 150 dwellings or more, at least 1% of the housing plots should be made available as self-build or custom-build plots. Whilst our client recognises the intention of the policy, our client would urge for a pragmatic approach to be taken with regards to self-build/custom-build requirements. On a site of 150 dwellings (at the lower end of the threshold), a 1% requirement would equate to just 1.5 housing plots. A self-build/custom-build development has very specific requirements and it is considered that preparing a Design Code and Plot Passport for a single plot is an onerous requirement. It would also be helpful to understand the background evidence to this policy which could be drawn from the Council's self build register, that is referenced in the policy. From our client's experience, the market for self build/custom build plots, is different from the market for the 'turn key' housing developments. It is unclear how the inclusion of a self build plots on a typical residential development would work in practice. The policy includes a clause whereby if the plot has not sold in a period no less than 12 months, the self-build requirement will fall away. However, the logistics of site build out need to be considered. If the self-build plot is located at the start of the build out period, construction may surpass the plot by the time the requirement falls away. This would either necessitate a developer having to return to the plot which could very well be situated within an occupied area of the development. This could easily give rise to complaints from new residents. On the other hand, if a single dwelling is being built within an area of the site which is finished, it may affect plot sales if residents do not want to live next to an active building site. If the self-build plot is located within the development, either in the middle or end of the build period, if the plot sells and the developer is not up to that plot in their build period, the purchaser of the plot would be unable to build their plot due to lack of infrastructure. They would be required to sit on the land until access roads and drainage are installed to their boundary. Thirdly, it is considered that the introduction of such a requirement significantly raises the risk of conflict as it introduces a new contractor on an active building site. Logistically, imposing such a small requirement has the potential to cause a number of issues. Lastly, and in the context of Skerningham, our client has previously identified its intension to provide an area of self build/custom build plots in a later phase of the development in a location of the site where it would be appropriate and desirable. This is a logical and pragmatic approach to the overall site masterplan, rather than incorporating 1% across	Skerningham Estates would urge for a pragmatic approach to be taken with regards to self-build/custom-build requirements. On a site of 150 dwellings a 1% requirement would equate to just 1.5 housing plots. Preparing a Design Code and Plot Passport for a single plot is an onerous requirement. It would be helpful to understand the background evidence to this policy which could be drawn from the Council's self build register. The market for self-build/custom build plots is often different and including them within a typical residential development could pose practical issues. The policy includes a clause whereby if the plot has not sold in a period no less than 12 months, the self build requirement will fall away. The logistics of site build out need to be considered. If the self build plot is located at the start of the build out period, construction may surpass the plot by the time the requirement falls away. This would either necessitate a developer having to return to the plot which could be situated within an occupied area of the development (leading to complaints from residents). If a single dwelling is being built within an area of the site which is finished, it may affect plot sales if residents do not want to live next to an active building site. Infrastructure would also need to be in place for a self-build plot to begin construction. This would create potential issues. Setting the requirement would raise the risk of conflict as it introduces a new contractor on an active building site. In the context of Skerningham, there is the intension to dprovide an area of self build/custom build plots in a later phase of the development in a location of the site where it would be appropriate and desierable. This is a logical and pragmatic approach, rather than incorporating 1% across each phase.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19). To mitigate potential issues around the practicalities of delivering self build and custom build it is proposed to increase the site threshold to 500 dwellings within the policy. This will also result in a more suitable number of self/custom build units on sites.	Yes	Increase site threshold within policy H4 to 500 dwellings or more.

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LPR111 & 112e	Housing	Ben Westwood / Jo	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		H4 – Self-Build and Custom Build Housing		Object	It is recognised that Draft Policy H 4 is a new policy that expands on previous policy text within adopted Policy H 4. Draft Policy H 4 sets out a requirement that "on sites of 150 dwellings or more at least 1% of the housing plots should be made available as self-build or custom build plots to meet the demand identified on the Council's self-build register". To reiterate, there has been no evidence published to support the Local Plan Review, including the 2025 LHNA nor details of the Council's self-build register. At the time of writing, there is no justified or evidenced rationale to support the provision of 1% of self-build or custom plots until such time that required evidence to support this policy requirement is provided. Notwithstanding the lack of evidence provided by the Council for the delivery of 1% of self-build plots on any site, our Client would also question the proposed 'threshold' of 150 dwellings as a trigger for requiring self-build plot provision. Again, there is no evidence to confirm whether alternative development yields have been tested, and if so why other 'thresholds' were discounted. No viability testing is understood to have been undertaken to assess any impacts of a 1% provision on schemes of 150 dwellings, also. Paragraph 6.5.1 of the supporting text makes reference to identifying "some demand for self-build plots" from the 2025 LHNA and self-build register, without confirming the exact demand (i.e. the number of prospective residents registered with the Council for self-build plots). Paragraph 6.5.1 continues by confirming that "this [demand] is limited". Despite this limited demand, the Council are seeking "to widen opportunities for people to build their own homes" by providing for a 1% allowance in Draft Policy H 4. This approach assumes that delivering a larger supply of self-build and/or custom build plots will increase demand for such products, which is unfounded and without evidence. Our Client therefore does not consider the requirements of Draft Policy H4 to be justified. Therefore, we would propose that the requirement for 1% self-build or custom homes to be delivered on residential schemes over 150 units is deleted. Instead, our Client would support an approach that delivers a flexible policy mechanism to achieve self-build and custom homes based on identified demand at any given time across the Plan period. If the Council was minded to retain the second paragraph of Draft Policy H4, we would propose that a caveat is added to allow applicant's to submit evidence in order to demonstrate a lack of demand within a particular market area for self-build or custom build properties, thus negating the 1% requirement to be provided.	There is no justified or evidenced rationale to support the provision of 1% of self-build or custom plots. The threshold of 150 dwellings is also questioned as there is no evidence to confirm whether alternative development yields have been tested and if so discounted. No viability testing has been undertaken on the impacts. Concerns raised that the supporting text describes the demand as limited. Appears that the approach is to increase supply to stimulate demand, which is unfounded and without evidence. It is proposed that the 1% requirement for self-build and custom build plots on schemes over 150 units is deleted. Support for an approach that is flexible and based on identified demand at any given time across the Plan period. If the Council retains the second paragraph of H4, we would propose that a caveat is added to allow applicant's to submit evidence in order to demonstrate a lack of demand within a particular market area for self-build or custom build properties, thus negating the 1% requirement to be provided.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	
LPR113 & 114k	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		H4 – Self-Build and Custom Build Housing		Object	Bellway supports the principle of widening housing choice, where it is justified and supported by robust evidence. However, the policy relies on evidence from the LHNA which remains in draft form and has not been published alongside the Draft Plan. As such, it is not possible to assess whether the requirements for sites of in excess of 150 dwellings to provide 1% of plots as self-build or custom build plots is justified or proportionate. 3.14.3 Paragraph 6.5.1 of the supporting text acknowledges that demand for self-build plots within the Borough is limited. Therefore, Bellway fail to see how Policy H4 can be justified in introducing a blanket requirement in the absence of clear evidence demonstrating sufficient demand. This approach will place unnecessary and ineffective requirements on larger developments. Bellway therefore reserves the right to revisit Policy H4 once the Local Housing Needs Assessment has been published, in order to fully assess the policy's soundness in the context set out above.	The policy relies on evidence from the LHNA which is not available. As such, it is not possible to assess whether the requirements for sites of in excess of 150 dwellings to provide 1% of plots as self-build or custom build plots is justified or proportionate. Concerns raised that the supporting text refers to limited demand. Therefore how can the banket requirement be justified.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	
LPR116c	Housing	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		H4 – Self-Build and Custom Build Housing		Object	Draft Policy H4 mandates a requirement for all major residential developments delivering 150 dwellings or more to provide 1% of plots for self-build or custom-build opportunities. Firstly, there is no justification provided within the draft policy wording, supporting text or supporting evidence documents to justify why the seemingly arbitrary figure of 150 dwellings has been selected as the 'trigger' point for self-build/custom-build provision. There is no evidence to confirm whether other development yields have been tested, and why the 150 dwelling trigger was deemed appropriate. Paragraph 6.5.1 of the supporting text makes reference to both the Council's LHNA, which has not been published, and the Councils Custom and Self-build Register, data from which has not been provided, identifying "some demand for self-build plots" without quantifying said demand, before going on to say "this [demand] is limited". Despite this limited demand, Paragraph 6.5.1 concludes that the Council are seeking "to widen opportunities for people to build their own homes". This approach is not considered to be justified, and is therefore unsound, as it is predicated on an unfounded assumption, in the absence of supporting evidence, that by simply delivering a greater supply of self-build and custom build plots, this will automatically increase demand for such products. On this basis, our Client does not consider the requirements of Draft Policy H4 to be justified. We would propose that the mandatory 1% requirement for delivery of self-build and custom build plots be deleted in its entirety, to instead allow greater flexibility based on identified demand at a given point in time across the Plan period. If the Council was minded to retain the second paragraph of Draft Policy H4, we would propose that a caveat is added to allow applicants to submit evidence in order to demonstrate a lack of demand within a particular locale/market area for self-build or custom build properties, thus negating the 1% requirement to be provided.	No evidence or justification behind the 150 uits threshold or explanation if alternatives had been considered. Concerns raised as the supporting text describes limited demand with no detail published in a LHNA or data from the Council's self-build and custom build register. Increasing supply to stimulate demand is not a justified approach. It is proposed that the 1% requirement for self build and custom build plots on schemes over 150 units is deleted. Support for an approach that is flexible and based on identified demand at any given time across the Plan period. If the Council retains the second paragraph of H4, we would propose that a caveat is added to allow applicant's to submit evidence in order to demonstrate a lack of demand within a particular market area for self-build or custom build properties, thus negating the 1% requirement to be provided.	Further evidence on the demand for self build and custom build housing will be porvided at the next stage of plan preparation (Reg 19).	No	
LPR102d	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy		H4- Self build and custom build housing		N/A	It is noted that section 6.6.3 of the draft Local Plan Review states "Local Plan viability testing will take place at the next stage of plan making and will inform the publication draft. This will examine the impact of the affordable housing requirement on the viability of housing development across the borough. If necessary, the percentages will be altered within policy HS to ensure the requires are viable". It is essential that the plan fully considers viability in forming the policy requirements. Considering the impacts of the current Local Plan Review for the Borough, which includes extending the plan period by a further 6 years, we have concerns that viability does not appear to have been a factor in the current draft version of the Local Plan. This is particularly so when several changes have been made to the housing trajectory, which include an increase to delivery rates and site capacities. We therefore reserve our right to comment in further detail on this critical matter at the next stage of consultation.	It is noted that Local Plan viability testing will take place at the next stage of plan making. It is essential that the plan fully considers viability in forming the policy requirements. We have concerns that viability does not appear to have been a factor in the current draft version of the Local Plan. This is particularly so when several changes have been made to the housing trajectory, which include an increase to delivery rates and site capacities. We therefore reserve our right to comment in further detail on this critical matter at the next stage of consultation.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR119	Housing	Natasha Styles	McCARTHY & STONE & CHURCHILL LIVING	The Planning Bureau, 4th Floor, 100 Holdenhurst Road, Bournemouth, Dorset, BH8 8AQ	Policy		H3 - Housing Mix		Object	See submission for full detail. Locally, the council commissioned Housing Market Assessment in 2020 which looks in detail at the specific needs of older people. Of note from this study it shows that there is a need for 2,148 sheltered housing units to 2036 and a need for 980 extra care housing units. The above confirms a pressing need for specialist housing for older people locally. A positive policy approach will be required to facilitate such delivery. The best approach towards meeting the diverse housing needs of older people is for the plan to: • Identify the older person's housing need. • Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services. • Include a standalone policy actively supporting the delivery of specialist older people's housing with good access to services and facilities for older people. Developers of older person's housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring. Given also that such developments "help reduce costs to the social care and health systems" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided. While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council: "The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."	Background information submitted on olderpersons housing need. References to the NPPF and PPG requirements around meeting the needs of this group. Evidence within the Strategic Housing Market Assessment 2020 referenced. The study shows that there is a need for 2,148 sheltered housing units to 2036 and a need for 980 extra care housing units. The above confirms a pressing need for specialist housing for older people locally. A positive policy approach will be required to facilitate such delivery. The best approach towards meeting the diverse housing needs of older people is for the plan to; identify the older person's housing need; allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services; include a standalone policy actively supporting the delivery of specialist older people's housing with good access to services and facilities for older people. While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided: "The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."	Comments noted. Policy H4 of the current Local Plan includes a similar policy approach for older persons housing, supporting proposals for older people and those with disabilities in sustainable locations. This is to be retained in the reviewed Local Plan. There are allocations coming forward potentially with some older persons housing provided. However, these plans are not certain at this stage and therefore it is not considered appropriate to allocate them for this specific use.	No	
LPR123i		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	Burtree Employment Park (Policy E2)	H5 - Affordable Housing		N/A	It is noted that affordable housing requirements remain at 20% for Brinkburn and Faverdale, with proposed changes to the tenure split. Changes are also proposed to the number of accessible dwellings within a housing mix (category 2 and 3 requirements) and new requirements for 1% of homes to be self or custom build. This is based on a referenced Local Housing Needs Assessment (LHNA) dated 2025. HLL/HE reserve the right to comment further on these matters following the publication of the associated evidence base. Site suitability and viability is a consideration on policies H3 and H5 and could also be referenced in H4.	It is noted that affordable housing requirements remain at 20% for Brinkburn and Faverdale, with proposed changes to the tenure split. Changes are also proposed to the number of accessible dwellings within a housing mix (category 2 and 3 requirements) and new requirements for 1% of homes to be self or custom build. This is based on a referenced Local Housing Needs Assessment (LHNA) dated 2025. HLL/HE reserve the right to comment further on these matters following the publication of the associated evidence base. Site suitability and viability is a consideration on policies H3 and H5 and could also be referenced in H4.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR029a	Housing	David Phillips	Butterfly Conservation North East		Section		H5 - Affordable Housing (strategic)	6. Housing	Support	6.6.1-6.6.3 Policy H5 & H6. Very welcome that Darlington Borough Council recognises there is a significant need for affordable housing, however, the Council must ensure that affordable housing remains a priority within this Local Plan and that targets are not watered down by developers once planning permission has been secured.	Welcome that the Council recognises there is a significant need for affordable housing, however, the Council must ensure that affordable housing remains a priority within this Local Plan and that targets are not watered down by developers once planning permission has been secured.	The Council does recognise that there is a significant need for affordable homes in the borough. Delivery of these homes is being pursued through various routes. It should be noted that the percentage requirements of policy H5 are subject to site viability. Please see the final paragraph of the policy.	No	
LPR041d	Housing	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy		H5 – Affordable Housing (strategic)		Object	The interrelationship between this policy, H3 and H6 needs to be worked through.	The interrelationship between this policy, H3 and H6 needs to be worked through.	The Council considers that the approach across these policies and SD3 Development Limits is appropriate and has previously been found sound in the adopted Local Plan.	No	

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LPR044c	Housing	Vanessa			Policy		H5 – Affordable Housing (strategic)		Object	Affordable Housing Wording changes shift it from social to affordable (80% of market rate) rents. This contradicts government policy for councils to offer more social rents, and reduces affordability. This wording change should be reversed to prioritise social rent. An increase in the proportion of affordable homes in higher value wards is welcomed. These must normally be built as mixed developments, not payment given in lieu for off-site delivery, and must include the council's own joint-venture developments. I disagree with 100% of affordable homes in low-value wards being for affordable ownership. These wards have the highest rates of private renting. More social rents are needed to make rents more affordable, before people can afford to buy. Land allocated for housing must be close to shops, services and public transport, or these must be delivered early in its build-out. This is critical for social housing where car ownership is low, or we embed continued deprivation and car dependence. Viability assessments have built in a too high (20% profit margin) the government must lower this. Until then, borderline viability must be firmly challenged, and not be a reason to drop essential affordable housing and social / mitigation requirements. Development which doesn't meet our needs should not be built. Policy H5, p.337 uses current ward names - these must be updated once the Boundary Review is complete to ensure clarity. New garden villages built beyond the current urban edge should be a new category, requiring 30% affordable homes. We disagree with removal of the First Homes policy (30% discount on 20% of the homes, for local key but low-income workers). It's successfully implemented nearby, if we need an affordable housing officer to deliver it, we should employ one.	A number of concerns raised with policy H5. Wording changes from social to affordable rents. This contradicts government policy to offer more social rents. Increase in the proportion of affordable homes in higher value wards welcomed. Affordable must be delivered in mixed developments, not payment of off-site contributions and must include the Council's own joint venture developments. Disagree with the requirement that 100% of homes in low value areas should be affordable home ownership. More social rent is needed here. Land allocated for housing must be close to shops, services and public transport, or these must be delivered early in its build-out. This is critical for social housing where car ownership is low. Viability assessments build in too high a profit margin for developers. This must be lowered. Ward names must be updated once the boundary review is complete. The garden villages should require 30% affordable homes. Disagree with the removal of the First Homes policy.	Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. The policy also sets out that affordable housing will normally be provided on-site alongside market housing to create balanced and mixed communities. There are exceptions to this approach involving off-site provision and this was found sound for the adopted Local Plan. 100% affordable home ownership is still being pursued in the central, lower value wards as this was informed by viability testing which is currently being updated. Profit inputs for viability assessments are usually set at 20% which is in line with planning guidance. Ward names will be updated if available before the Local Plan Review is adopted. Affordable housing requirements at the garden village sites are informed by Local Plan viability testing. The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, has been removed via footnote 31 of the NPPF. As such the Council cannot insist on the inclusion of First Homes in affordable provision but this tenure is still accepted as an affordable home ownership product.	No	
LPR049a	Housing	Ken Maddison - sut	Resident		Policy		H5 - Affordable Housing (strategic)		Object	Why should Hummersnott, Mowden, Hurworth and Park West carry the highest affordable home category of 30%. It would be much better if the entire borough shares the mantle at 20%, but it must be applied to all developments and not just ones that are deemed "appropriate". This would be in line with the Planning Inspectorate observation at the last examination. Mr William Fieldhouse in fact went as far as to suggest DBC where planning Getto's and this practice must cease !	Why should Hummersnott, Mowden, Hurworth and Park West have a 30% affordable housing requirement. It would be better if there was a standard 20% requirement for the whole borough. It must be applied to all developments and not just ones that are deemed "appropriate". This would be in line with the Planning Inspectorate observation at the last examination.	Affordable housing requirments in policy H5 are informed by whole plan viability testing. This ensures that maximum delivery is secured without impacting on the deliverability of sites. As such higher value areas can often have a higher requirement and they can vary across the borough as it has done in policy H5. There are exceptions in policy H5 to allow off-site delivery of affordable homes and this approach was found sound in the adopted Local Plan.	No	
LPR051j	Housing	Chris Martin	HBF		Policy		H5 - Affordable Housing (strategic)		N/A	Policy H5 seeks to retain the percentage affordable housing requirements that are in the current adopted Local Plan. These vary depending on the location within the Borough (ranging from 10% – 30%). However, the Council has sought to change the tenure requirements in areas which have 20% and 30% affordable housing requirements to the following split:. •51% social rent. •7% affordable rent. •42% affordable home ownership For those areas falling in the 10% affordable housing requirement, the affordable offer is to be 100% affordable home ownership. When examining tenure, the Council requires that applicants have regard to the most recent LHNA. The HBF would seek additional flexibility for affordable housing requirements for in-stances where a site may struggle to deliver the exact tenure split in the policy. This may be for viability reasons or that a Registered Provider cannot be identified to acquire the affordable prop-erties on a site. The Council will also need to robustly test the viability of the affordable housing requirement with reference to the new tenure split to ensure that it does not undermine the deliverability of new homes. The supporting text to Policy H5 copies over the definitions of each of these tenures from the NPPF. Given that these definitions can slightly change over time, the HBF recommends that rather than copying the definitions, the supporting text should simply point the reader to the NPPF where the definitions are provided. That way, the supporting text can remain up to date throughout the plan period.	Changes to the tenure requirements within policy H5 noted. Additional flexibility sought for the requirements, for instances where a site may struggle to deliver the exact tenure split in the policy. This may be for viability reasons or that a Registered Provider cannot be identified to acquire the affordable units. The affordable requirements and new tenure split will need to be considered in local plan viability testing to ensure that they do not undermine deliverability of new homes. Suggested to remove the definitions of affordable housing and refer to the NPPF where the definitions are provided. This will prevent the text becoming out of date.	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed. Definitions of affordable housing are to be removed and reference to the NPPF provided.	Yes	Remove affordable housing definitions in supporting text and refer to the NPPF 2024.
LPR053a	Housing	Patricia Meredith	Resident		Section		H5 - Affordable Housing (Strategic Policy)		Object	I object to the shift from social rent to affordable rent (80% of market rate), which contradicts national policy encouraging more social rent provision. I support increased affordable housing in high value wards, delivered on site rather than through off site payments. Low value wards require more social rent, not 100% affordable ownership. Viability assessments currently assume an inflated 20% profit margin; borderline viability must be challenged. Garden villages should require 30% affordable housing. The removal of the First Homes policy is not supported, why not?	Concerns raised. Objection to the shift from social rent to affordable rent, which contradicts national policy. Support increased affordable housing in high value wards, delivered on site rather than through off site payments. Low value wards require more social rent, not 100% affordable ownership. Viability assessments currently assume an inflated 20% profit margin. Garden villages should require 30% affordable housing. The removal of the First Homes policy is not supported and questioned.	Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. The policy also sets out that affordable housing will normally be provided on-site alongside market housing to create balanced and mixed communities. There are exceptions to this approach involving off-site provision and this was found sound for the adopted Local Plan. 100% affordable home ownership is still being pursued in the central, lower value wards as this was informed by viability testing which is currently being updated. Profit inputs for viability assessments are usually set at 20% which is in line with planning guidance. Affordable housing requirements at the garden village sites are informed by Local Plan viability testing. The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, has been removed via footnote 31 of the NPPF. As such the Council cannot insist on the inclusion of First Homes in affordable provision but this tenure is still accepted as an affordable home ownership product.	No	
LPR059 & 60g	Housing		Hallam Land	Dominc Crawley, Lichfields	Policy		H5 – Affordable Housing (strategic)		Object	Hallam Land note that Policy H5 remains largely as per the adopted Local Plan albeit the tenure mix requirement has been updated for two of the three location areas. Whilst Hallam Land has no objection to this in principle, they wish to raise the following points: • It important that the latest affordable housing requirements are tested to ensure they do not unacceptably impact on the viability of delivery across Darlington; and • Flexibility should be incorporated within the policy to allow alternative affordable housing mixes to be accepted where circumstances demonstrate this would be appropriate.	Alterations to tenure split noted. Alterations to affordable housing requirements should be tested to ensure they do not unacceptably impact on viability of delivery. Flexibility should be incorporated within the policy to allow alternative affordable housing mixes to be accepted where circumstances demonstrate this would be appropriate.	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed.	No	
LPR062	Housing	David Clark	Resident		Section			6. Housing	Object	I would like object that DBC want to remove First Home Scheme from their revised local plan. This scheme that offers local First Time Buyers, prioritising key workers up to 30% discount of properties has not been closed its still active in England (closed in Scotland only) many local authorities in the North East are delivering these First Homes for their First Time Buyers but so far DBC have managed to secure none? The Skerningham GV developers document entitled 'Skerningham Strategic Allocation, Darlington Viability Assessment Skerningham Estates Ltd 14 June 2024' has an allocation for First Homes by listing 185 dwellings under the scheme so why remove it from the revised local plan? In doing so this would deprive Darlington First Time Buyers being able to purchase properties on allocations such as Skerningham GV with a 30% discount and a Local Plan is supposed to be for people living in Darlington and not new home builder profits / site allocation viability. So DBC will need to give a valid reason for wanting to remove First Homes from their revised Local Plan affordable home strategy and check current NPPF requirements in doing so. Screen shot below from Skerningham developers viability report 14 June 2024. See submission. NPPF & National Policy Requirements •Mandatory Requirement: National policy (established via a Written Ministerial Statement) generally requires that First Homes should account for at least 25% of all affordable housing units delivered through planning obligations. Evidence Base: The NPPF requires local plan policies to be "underpinned by relevant and up-to-date evidence". If Darlington Borough Council (DBC) intends to remove First Homes, they must provide a robust Housing Needs Assessment (HNA) or Strategic Housing Market Assessment (SHMA) justifying why this specific tenure no longer meets Darlington's local needs.	Objection to the removal of the First Homes scheme from the revised Local Plan. This scheme that offers local First Time Buyers, prioritising key workers, up to 30% discount off properties has not been closed and is still active in England. Many local authorities in the North East are delivering these homes but so far DBC have managed to secure none. The Skerningham GV developers document entitled 'Skerningham Strategic Allocation, Darlington Viability Assessment Skerningham Estates Ltd 14 June 2024' has an allocation for First Homes by listing 185 dwellings under the scheme so why remove it from the revised Local Plan.	The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, has been removed via footnote 31 of the NPPF. As such the Council cannot insist on the inclusion of First Homes in affordable provision but this tenure is still accepted as an affordable home ownership product. The Council have secured First Homes at Maxgate Farm, MSG (Ashwood Grange) and Conscliffe Park South.	No	
LPR064 & 065k	Housing	Nick Pleasant	Stantec on behalf of Vistry		Policy		H5 – Affordable Housing (strategic)		Object	Vistry supports the principle of delivering affordable housing as part of new residential developments and has a strong track record of doing so across the country. Vistry is therefore concerned that the proposed reduction in the housing requirement will have a direct impact on the delivery of affordable housing. Reducing the overall level of planned housing growth will constrain the scale and number of residential schemes coming forward and will inevitably reduce opportunities to secure affordable housing through market led development. However, in the context of these concerns following confirmation from DBC the LHNA remains in draft form and has not been published alongside the Draft Local Plan, it is not possible to appropriately assess the evidence base for the amendments to tenure split introduced in the updated Policy H5. Highly prescriptive tenure splits are introduced but stakeholders are unable to meaningfully assess or test these requirements without access to the LHNA which underpins them. This prevents effective engagement in the consultation process and fails to provide transparency as to how the percentages and tenure assumptions have been derived. Nevertheless, DBC should provide the necessary evidence at the next available stage once the LHNA is finalised including a comprehensive evidence base which includes key documents such as a PPG compliant Viability Assessment which should appropriately test the implications of the policy requirement against the other policy requirements for residential developments. In addition, Vistry questions the change to Policy H5 to introduce a significantly different tenure split of the affordable requirement, from what is currently adopted. Local requirements for such a tenure split must be properly evidenced as it can have significant development viability implications. It should also not be overlooked that the long-term management of affordable housing is reliant on Registered Providers who may not want or consider the specified tenure mix as appropriate. Therefore, Vistry would strongly advocate for a more flexible policy approach on affordable housing tenure mix which considers the variety of complex factors involved in delivering affordable housing. See submitted attachment.	Concerns raised that reducing the housing requirement will have a direct impact on the delivery of affordable homes. Reducing housing growth will reduce opportunities to secure affordable housing through market led development. Given the LHNA has not been published it is not possible to assess the evidence base for the amendments to the tenure split.The lack of evidence prevents effective engagement. This evidence should be provided at the next available stage including a compliant viability assessment. Questions the significantly different tenure split. The long-term management of affordable housing is reliant on Registered Providers who may not want or consider the specified tenure mix as appropriate. Suggest a more flexible policy approach on tenure mix.	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed.	No	
LPR067 & 68h	Housing	Georgina Cox	Gladman		Policy		H5 – Affordable Housing (strategic)		Support	See submitted attachment. Gladman supports policy H5 and the affordable housing requirements set out across the Darlington Borough.	Gladman supports policy H5 and the affordable housing requirements set out across the Darlington Borough.	Support noted.	No	

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LPR075d	Housing	Lisa Locke	Resident		Policy		HS - Affordable Housing (Strategic Policy)		Object	6. Affordable housing must meet real needs: The shift in wording from "social rent" to "affordable rent" weakens the commitment to genuinely affordable housing. Affordable rent levels (up to 80% of market rates) are often still unaffordable for many local residents. The plan should prioritise social rent in line with local need and national policy direction. 7. Questionable viability assumptions: The use of high assumed developer profit margins in viability assessments risks reducing the level of affordable housing and necessary mitigation. Where developments cannot meet policy requirements, this should be challenged robustly. Schemes that fail to deliver community benefits should not proceed in their current form.	Affordable housing must meet real needs. Concerns with the change in wording from social rent to affordable rent. This weakens the commitment to genuinely affordable housing. Affordable rent is still often unaffordable to local residents. Social rent should be prioritised in line with local need and national policy. The use of high developer profit margins in viability assessments risks reducing the level of affordable housing.	Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. Profit inputs for viability assessments are usually set at 20% which is in line with planning guidance.	No	
LPR084	Housing	Tony Gillam	Resident		Section		Policy H5 - Affordable Housing (Strategic Policy)	6. Housing	Object	Affordable Housing I object to the shift from social rent to affordable rent (80% of market rate), which contradicts national policy encouraging more social rent provision. We support increased affordable housing in high value wards, delivered on site rather than through off site payments. Low value wards require more social rent, not 100% affordable ownership. Viability assessments currently assume an inflated 20% profit margin; borderline viability must be challenged. Garden villages should require 30% affordable housing. The removal of the First Homes policy is not supported; if staffing is required to deliver it, the council should provide this.	Objection to the shift from social rent to affordable rent which contradicts national policy. Support for increased affordable housing in high-value wards, delivered on site rather than through off-site payments. Low value wards require more social rent not 100% affordable ownership. Viability assessments assume inflated 20% profit margin. Garden villages should requore 30% affordable housing. Objection to the removal of the First Homes policy.	Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. The tenure required in low value areas factors in what is viable. Profit inputs for viability assessments are usually set at 20% which is in line with planning guidance. The percentage requirement for affordable housing at the Garden Villages will be informed by the whole plan viability assessment. The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, has been removed via footnote 31 of the NPPF. As such the Council cannot insist on the inclusion of First Homes in affordable provision but this tenure is still accepted as an affordable home ownership product.	No	
LPR087o	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy H5 - Affordable Housing		N/A	Draft Policy H 5 remains largely unchanged, continuing to apply a stepped affordable housing requirement across identified wards within the Borough. The minimum requirement for any site is 10%, with this increasing to 30% depending on the site's location. For context, our Client's site falls within the Sadberge and Middleton St George Ward which has an affordable housing requirement of 20% While there is no proposed amendments to the requirement of affordable homes to be delivered, which our Client broadly supports, it is recognised that change is to be made to the tenure split of the affordable housing requirement. The currently adopted Policy H 5 in the DBLP requires an even 50 / 50 split of affordable rent and affordable home ownership. Draft Policy H 5 proposes: •51% Social Rent •7% Affordable Rent •42% Affordable Home Ownership As consistently highlighted throughout our Client's representations, the Local Plan Review has not been supported by any publicly available evidence to justify amendments of this nature. This includes the absence of a LHNA and a WPVA. The LHNA would assist in determining the market demand for such products, while the WPVA would assess the clear viability implications. Until such a time evidence is produced to justify this revised split, based on considerations such as market demand and demonstrating that this would be viable, our Client is unable to support or comment on the proposed amendments at this stage. Should the Council bring forward evidence at a later stage of Local Plan Review Consultation, our Client reserves the right to make further comments on this topic.	Changes to the policy noted; alterations to the tenure split. This has not however been supported by any publicly available evidence to justify the amendments. This includes the absence of a LHNA and a WPVA. The LHNA would assist in determining the market demand for such products, while the WPVA would assess the clear viability implications. Therefore unable to support or comment on the proposed amendments at this stage.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR092a	Housing	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		HS – Affordable Housing (strategic)		N/A	It is not possible to comment on the proposed affordable housing requirements as the Council's Whole Plan Viability Assessment is not available at this stage. Miller Homes therefore reserve their position on such matters until this vital part of the evidence base is available.	It is not possible to comment on the proposed affordable housing requirements as the Council's Whole Plan Viability Assessment is not available at this stage. Miller Homes therefore reserve their position on such matters until this vital part of the evidence base is available.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR094f	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469242	Policy		Policy H 5 Affordable Housing		Object	It is not possible to comment in detail on the proposed affordable housing requirements as the Council's WPVA is not available at this stage. As a result, Mandale Homes reserve their position on the above matter until the WPVA is available for scrutiny. Nevertheless, the proposed affordable tenure split within the policy is highly prescriptive and the policy would benefit from such additional wording to add some flexibility to allow a different tenure split to be delivered, where justified, without conflicting with the policy wording, for example where it would increase the viability of a scheme. Some suggested amended wording is below: 'The tenure split to be provided on site is set out within table 6.8 and differs across the three requirement areas. Any divergence from the stipulated requirements at table 6.8 would need to be robustly justified, and in determining the type and size of affordable housing to be provided, the Council will also have regard to individual site-specific circumstances, the evidence in the most recent Local Housing Needs Assessment and viability evidence.'	It is not possible to comment in detail on the proposed affordable housing requirements as the Council's WPVA is not available at this stage. Despite this, the proposed affordable tenure split is highly prescriptive. Would suggest adding some flexibility. 'The tenure split to be provided on site is set out within table 6.8 and differs across the three requirement areas. Any divergence from the stipulated requirements at table 6.8 would need to be robustly justified, and in determining the type and size of affordable housing to be provided, the Council will also have regard to individual site-specific circumstances, the evidence in the most recent Local Housing Needs Assessment and viability evidence.'	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed.	No	
LPR102e	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Conisclffe Road, Darlington, DL3 7EH	Policy		HS - Affordable Housing (Strategic Policy)		N/A	It is noted that section 6.6.3 of the draft Local Plan Review states "Local Plan viability testing will take place at the next stage of plan making and will inform the publication draft. This will examine the impact of the affordable housing requirement on the viability of housing development across the borough. If necessary, the percentages will be altered within policy H5 to ensure the requires are viable". It is essential that the plan fully considers viability in forming the policy requirements. Considering the impacts of the current Local Plan Review for the Borough, which includes extending the plan period by a further 6 years, we have concerns that viability does not appear to have been a factor in the current draft version of the Local Plan. This is particularly so when several changes have been made to the housing trajectory, which include an increase to delivery rates and site capacities. We therefore reserve our right to comment in further detail on this critical matter at the next stage of consultation.	It is noted that Local Plan viability testing will take place at the next stage of plan making. It is essential that the plan fully considers viability in forming the policy requirements. We have concerns that viability does not appear to have been a factor in the current draft version of the Local Plan. This is particularly so when several changes have been made to the housing trajectory, which include an increase to delivery rates and site capacities. We therefore reserve our right to comment in further detail on this critical matter at the next stage of consultation.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR104n	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621229	Policy		Policy H5: Affordable Housing (Strategic Policy)		Object	14.1 While Taylor Wimpey supports the delivery of affordable housing, the proposed levels and tenure mix are not supported by an adequate evidence base. In particular, neither a whole-plan viability assessment nor an up-to-date Local Housing Needs Assessment has been published. In the absence of such evidence, the policy cannot be demonstrated to be justified or deliverable, contrary to the requirements of the 2024 National Planning Policy Framework. Justification 14.2 Policy H5 seeks to retain the percentage affordable housing requirements that are in the current adopted Local Plan. These vary depending on the location within the Borough (ranging from 10% – 30%). However, the Council has sought to change the tenure requirements in areas which have 20% and 30% affordable housing requirements to the following split: • 51% social rent. • 7% affordable rent. • 42% affordable home ownership 14.3 For those areas falling in the 10% affordable housing requirement, the affordable offer is to be 100% affordable home ownership. 14.4 When examining tenure, the Council requires that applicants have regard to the most recent LHNA. Taylor Wimpey would seek additional flexibility for affordable housing requirements for instances where a site may struggle to deliver the exact tenure split in the policy. This may be for viability reasons or that a Registered Provider cannot be identified to acquire the affordable properties on a site. 14.5 The Council will also need to robustly test the viability of the affordable housing requirement with reference to the new tenure split to ensure that it does not undermine the deliverability of new homes. 14.6 The supporting text to Policy H5 copies over the definitions of each of these tenures from the Framework. Given that these definitions can slightly change over time, Taylor Wimpey recommends that rather than copying the definitions, the supporting text should simply point the reader to the Framework where the definitions are provided. That way, the supporting text can remain up to date throughout the plan period. 14.7 Policy H5 proposes to retain the percentage affordable housing requirements set out in the adopted Local Plan, which vary across the Borough from 10% to 30%. However, the policy introduces revised tenure requirements within areas subject to 20% and 30% affordable housing provision, comprising 51% social rent, 7% affordable rent and 42% affordable home ownership. Within areas subject to a 10% affordable housing requirement, the proposed approach seeks 100% affordable home ownership.	The proposed levels and tenure mix of affordable housing are not supported by an adequate evidence base; neither a whole-plan viability assessment nor an up-to-date Local Housing Needs Assessment has been published. Therefore, the policy cannot be demonstrated to be justified or deliverable, contrary to the requirements of the 2024 NPPF. Taylor Wimpey would seek additional flexibility for affordable housing requirements for instances where a site may struggle to deliver the exact tenure split in the policy. This may be for viability reasons or that a Registered Provider cannot be identified to acquire the affordable properties on a site. The supporting text to the policy copies over the definitions of these tenures from the NPPF. Given that these definitions can slightly change over time, it is recommended that the text points the reader to the NPPF where the definitions are provided. That way the text can remain up to date throughout the plan period.	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed. Affordable housing definitions will be removed.	Yes	Remove affordable housing definitions in supporting text and refer to the NPPF 2024.
LPR105n	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621231	Policy		HS - Affordable Housing (Strategic Policy)		Object	While Taylor Wimpey supports the delivery of affordable housing, the proposed levels and tenure mix are not supported by an adequate evidence base. In particular, neither a whole-plan viability assessment nor an up-to-date Local Housing Needs Assessment has been published. In the absence of such evidence, the policy cannot be demonstrated to be justified or deliverable, contrary to the requirements of the 2024 National Planning Policy Framework. Policy H5 seeks to retain the percentage affordable housing requirements that are in the current adopted Local Plan. These vary depending on the location within the Borough (ranging from 10% – 30%). However, the Council has sought to change the tenure requirements in areas which have 20% and 30% affordable housing requirements to the following split: • 51% social rent. • 7% affordable rent. • 42% affordable home ownership 14.3 For those areas falling in the 10% affordable housing requirement, the affordable offer is to be 100% affordable home ownership. 14.4 When examining tenure, the Council requires that applicants have regard to the most recent LHNA. Taylor Wimpey would seek additional flexibility for affordable housing requirements for instances where a site may struggle to deliver the exact tenure split in the policy. This may be for viability reasons or that a Registered Provider cannot be identified to acquire the affordable properties on a site. 14.5 The Council will also need to robustly test the viability of the affordable housing requirement with reference to the new tenure split to ensure that it does not undermine the deliverability of new homes. 14.6 The supporting text to Policy H5 copies over the definitions of each of these tenures from the Framework. Given that these definitions can slightly change over time, Taylor Wimpey the reader to the Framework where the definitions are provided. That way, the supporting text can remain up to date throughout the plan period. 14.7 Policy H5 proposes to retain the percentage affordable housing requirements set out in the adopted Local Plan, which vary across the Borough from 10% to 30%. However, the policy introduces revised tenure requirements within areas subject to 20% and 30% affordable housing provision, comprising 51% social rent, 7% affordable rent and 42% affordable home ownership. Within areas subject to a 10% affordable housing requirement, the proposed approach seeks 100% affordable home ownership. 14.8 The policy requires applicants to have regard to the most recent Local Housing Needs Assessment when determining tenure mix. While Taylor Wimpey supports the principle of aligning tenure with identified needs, it is considered that additional flexibility is necessary where site-specific circumstances prevent strict compliance with the prescribed tenure	See response to comment 104n above.	See response to comment 104m above.	Yes	See response to comment 104m above.

LPR107d	Housing	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, 01325469236, jeremy@elgplanning.co.uk	Policy		HS - Affordable Housing (Strategic Policy)		Neutral	With respect to the town centre sites, there is a requirement for 10% of the units to be 100% affordable home ownership. It is acknowledged that there is an exception test in relation to on-site provision, however, it is considered that there should be flexibility included in relation to tenure of the affordable units on certain sites in the most challenging locations, from a viability perspective. The following changes are suggested: The tenure split to be provided on site is set out within table 6.8 and differs across the three requirement areas. The tenure split set out in Table 6.8 may vary where justified by viability evidence or Registered Provider requirements. In determining the type and size of affordable housing to be provided, the Council will also have regard to the evidence in the most recent Local Housing Needs Assessment alongside up to date market information.	With respect to the town centre sites, there is a requirement for 10% of the units to be 100% affordable home ownership. It is considered that there should be flexibility included in relation to tenure of the affordable units on certain sites in the most challenging locations, from a viability perspective. The following changes are suggested: "The tenure split to be provided on site is set out within table 6.8 and differs across the three requirement areas. The tenure split set out in Table 6.8 may vary where justified by viability evidence or Registered Provider requirements. In determining the type and size of affordable housing to be provided, the Council will also have regard to the evidence in the most recent Local Housing Needs Assessment alongside up to date market information.	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed.	No	
LPR108b	Housing	Chris smith	Skerningham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1RF 0191 2615685	Policy		HS – Affordable Housing (strategic)		N/A	Policy HS of the Local Plan Review relates to affordable housing, and the proposed changes seek to amend the tenure split required on new developments of 10 or more dwellings, or sites of 0.5ha or more. For the areas where either a 20% or 30% would be applicable, the proposed changes result in a tenure split of: - 51% social rent - 7% affordable rent - 42% affordable home ownership In the locations (of Hummersknott, Hurworth, Mowden and Park West) where there is an affordable housing requirement of 30%, the proportion of dwellings to be available for affordable home ownership would increase from 35% to 42%. Conversely, in areas where there is a 20% affordable housing requirement (which includes our client's land at Skerningham Garden Village), there is a decrease in the proportion of affordable home ownership from 50% to 42%. The Council have identified the need for increasing the proportion of affordable home ownership within the Local Housing Need Assessment 2025. This assessment does not appear to have been made available to view, so our client reserves the right to provide further comments with the benefit of the supporting evidence. In addition, it is unclear if the Council has considered what the impact of this change would be on viability, stating that Local Plan viability testing will take place at the next stage of the plan making process. Until a new Local Plan is adopted, the impact of the proposed change in tenure split is not known and therefore there is a risk that this change could negatively affect viability in the short-term and negatively affect the delivery of housing. If there are delays in the preparation of a new Local Plan, this potential negative impact could be prolonged.	Alterations to the tenure split in policy H5 noted. The Council have identified the need for increasing the proportion of affordable home ownership within the Local Housing Need Assessment 2025. This assessment does not appear to have been made available to view, so our client reserves the right to provide further comments with the benefit of the supporting evidence. In addition, it is unclear if the Council has considered what the impact of this change would be on viability, stating that Local Plan viability testing will take place at the next stage of the plan making process. Concerns raised with the potential impacts on delivery.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR111 & 112f	Housing	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		HS- Affordable Housing (strategic)		Object	Draft Policy H 5 remains largely unedited in the context that there is a stepped affordable housing requirement across identified wards in the Borough. The minimum requirement for any site is 10%, with this increasing to 30% depending on the site's location. For context, our Client's Site falls within the Brinkburn and Faverdale Ward which has an affordable housing requirement of 20%. Policy H 5 in the adopted Local Plan outlines a 50:50 split in respect of affordable housing tenures, between affordable rent and affordable home ownership, within those wards subject to a 20% affordable housing requirement. We note the proposed revisions made to the affordable housing tenure splits within Draft Policy H 5 for said wards which now proposes the following tenure split: •51% Social Rent; •7% Affordable Rent; and •42% Affordable Home Ownership. However, the Local Plan Review has not been published with any supporting evidence to justify the proposed amendments to Draft Policy H 5. This includes the absence of the 2025 LHNA and a Whole Plan Viability Assessment. It is understood that the LHNA document has been prepared, but has not been made publicly available at this time, with supporting text inserted within the Regulation 18 document confirming that updated viability evidence has not been undertaken at this stage in the plan-making process. Taking each document in turn, the LHNA is of fundamental importance in understanding the Council's evidence for determining the demand for such affordable products. NPPF paragraph 16 requires plans, and by association the comprising policies, to be prepared positively, and shaped by effective engagement with stakeholders. Likewise, NPPF paragraph 36 notes that plans, and again by association their comprising policies, are required to be based on proportionate evidence, in order to be found sound. In the absence of clear evidence to underpin the proposed policy revisions, the draft policy cannot be taken to be justified nor positively prepared, and clearly effective engagement cannot be undertaken at this time on the basis that landowners and developers are unfairly prejudiced in their ability to provide robust, informed representations to plan policies in the absence of critical supporting evidence. On this basis, the draft policy is unsound, noting identified conflicts with the NPPF. Similarly, the Whole Plan Viability Assessment is required to evidence that the Council has undertaken a full, detailed assessment of the potential viability implications resulting from the proposed amendments toaffordable tenure requirements. Viability PPG provides the following requirements for viability-related considerations at plan-making stage:	Alterations to tenure split in policy H5 noted. However, the Local Plan Review has not been published with any supporting evidence to justify the proposed amendments to Draft Policy H 5. This includes the absence of the 2025 LHNA and a Whole Plan Viability Assessment. The importance of these evidence base documents is emphasised in terms of determining demand for such affordable products and assessing the viability implications resulting from the proposed amendments. Given the lack of supporting evidence the draft policy cannot be said to be positively prepared or justified and on this basis the soundness questioned. The evidence should be published at the earliest opportunity. Reserve the right to comment further but object to draft policy H5 as currently worded.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR113 & 114f	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		HS – Affordable Housing (strategic)		Object	Bellway supports the principle of delivering affordable housing as part of new residential developments and has a strong track record of doing so across the country. Bellway is therefore concerned that the proposed reduction in the housing requirement will have a direct impact on the delivery of affordable housing. Reducing the overall level of planned housing growth will constrain the scale and number of residential schemes coming forward and will inevitably reduce opportunities to secure affordable housing through market led development. However, in the context of these concerns following confirmation from DBC the LHNA remains in draft form and has not been published alongside the Draft Local Plan, it is not possible to appropriately assess the evidence base for the amendments to tenure split introduced in the updated Policy H5. Highly prescriptive tenure splits are introduced but stakeholders are unable to meaningfully assess or test these requirements without access to the LHNA which underpins them. This prevents effective engagement in the consultation process and fails to provide transparency as to how the percentages and tenure assumptions have been derived. Nevertheless, Bellway expect DBC to provide the necessary evidence at the next available stage once the LHNA is finalised including a comprehensive evidence base which includes key documents such as a PPG compliant Viability Assessment which should appropriately test the implications of the policy requirement against the other policy requirements for residential developments. In addition, Bellway questions the change proposed in Policy HS to introduce a significantly different tenure split of the affordable requirement, from what is currently adopted. Local requirements for such a tenure split must be properly evidenced as it can have significant development viability implications. It should also not be overlooked that the long-term management of affordable housing is reliant on Registered Providers who may not want or consider the specified tenure mix as appropriate. Therefore, Bellway would strongly advocate for a more flexible policy approach on affordable housing tenure mix which takes into account the variety of complex factors involved in delivering affordable housing.	Bellway is concerned that the proposed reduction in the housing requirement will have a direct impact on the delivery of affordable housing. Reducing the overall level of planned housing growth will constrain the scale and number of residential schemes coming forward and will inevitably reduce opportunities to secure affordable housing through market led development. The LHNA has not been published and therefore it is not possible to assess the evidence base for the amendments to the tenure split. It is expected that the LHNA will be published at the next stage along with a Viability Assessment. Bellway would strongly advocate for a more flexible policy approach on affordable housing tenure mix which takes into account the variety of complex factors involved in delivering affordable housing.	Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment. There is flexibility within the policy as it sets out, where an applicant considers that the provision of affordable housing in accordance with the requirements would make a scheme unviable, a detailed viability assessment can be submitted to demonstrate that this is the case and to show the maximum level of affordable housing that could be delivered. If there were issues with providing the required tenure split, such as not being able to secure a registered provider, this could be considered further at the application stage and alternatives discussed.	No	
LPR115b	Housing	Emma Williams	Church Commissioners for England - Deloitte	Emma Williams, Deloitte,	Policy		HS- Affordable Housing (strategic)		Object	The Commissioners consider that the proposed amendment to the affordable housing tenure split requires further thought. The proposal significantly increases the proportion of social rent tenure which could have a detrimental effect on the viability of schemes and should be fully analysed through a viability appraisal. This change, alongside other proposed policy changes that also increase development costs, could significantly reduce viability of schemes and hinder the delivery of much-needed affordable housing. The Council should carefully assess the cumulative impact of these policy changes on the deliverability of housing sites. The Commissioners therefore suggest that the Council undertakes a comprehensive viability appraisal of the proposed amendments to affordable housing tenure split or reconsiders its proposed amendments to Policy HS.	The proposed amendment to the affordable housing tenure split requires further thought. The proposal significantly increases the proportion of social rent tenure which could have a detrimental effect on the viability of schemes and should be fully analysed through a viability appraisal.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR116d	Housing	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		HS- Affordable Housing (strategic)		Object	Draft Policy H5 provides a revised affordable tenure split for those 'Locations' with both a 20% and 30% affordable housing requirement, respectively. For context, our Client's Site falls within the Sadberge and Middleton St George Ward (20% affordable housing requirement). The 50:50 split between Affordable Rent and Affordable Home Ownership tenures is proposed to be amended as follows: •51% Social Rent; •7% Affordable Rent; and •42 Affordable Home Ownership. As stated above, the LHNA has not been published as part of the LPR process to date. Similarly, Paragraph 6.6.3 of the Regulation 18 consultation confirms viability testing is yet to be undertaken, and so the potential viability implications of the revised affordable housing tenure splits have yet been established by the Council. Draft Policy H5 cannot be said to be justified at this time, on this basis. Our Client reserves the right to comment further on Draft Policy H5 at a later stage in the LPR process, subject to evidence within the LHNA being made publicly available.	Alterations to the tenure split in policy H5 noted. The LHNA has not been published as part of the LPR process to date. Similarly, viability testing is yet to be undertaken, and so the potential viability implications of the revised affordable housing tenure splits have yet been established. Draft Policy H5 cannot be said to be justified at this time, on this basis. Reserve the right to comment further at a later stage, subject to evidence within the LHNA being made publicly available.	Comments noted. Prior to the next stage of plan preparation (Reg 19) further evidence will be published including a Local Housing Needs Assessment and a whole plan viability assessment.	No	
LPR117a	Housing	James Beackon	NHS Property Services		Policy		HS - Affordable Housing (Strategic)		Neutral	NHSPS support the principle of delivering affordable housing in line with the identified local housing need. In undertaking further work on local housing needs, we suggest the Council also consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council: • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	Support the principle of delivering affordable housing in line with the identified local housing need. In undertaking further work on local housing needs, we suggest the Council also consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.	Comments noted.	No	

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LPR119	Housing	Natasha Styles	McCARTHY & STONE & CHURCHILL LIVING	The Planning Bureau, 4th Floor, 100 Holdenhurst Road, Bournemouth, Dorset, BH8 8AQ	Policy		H5 - Affordable Housing (Strategic)		N/A	Policy H5 seeks a varied affordable housing requirement of between 10% and 30% depending on the location. It then sets a tenures split for affordable housing. We note that consultation has been published with Local Plan Viability Assessment dated December 2020. This is dated and has not tested sheltered or extra care housing with respect to Viability. Without the supporting evidence of an up-to-date viability study that tests specialist housing for older people for viability, it is difficult to ascertain if any of the options put forward are realistic or deliverable. Although we appreciate this consultation is an early stage of plan production, we advise that by limiting scrutiny of an up to date Local Plan Viability Assessment the Council is reducing the opportunities for comment on a crucial element of the evidence base that will inform policy and deliverability directly and the Local Plan would be less robust as a consequence. The council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the council's policy requirements should therefore be robust and be used to form deliverable and realistic policies. The council should note that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that the older person's housing typologies should be robustly assessed separately. It cannot be simply regarded as standard housing. Specialist housing schemes for older people tend to be based around communal facilities and community living and delivered on smaller sites. Older persons housing therefore differs from a standard model of development because as confirmed within the PPG (Paragraph: 010 Reference ID: 63-010-20190626) it generally has additional facilities such as extensive communal areas, such as space to socialise, a wellbeing centre as well as a care service with 24 hour access to support services and staff, meals are also often available. This enables residents to live much more independently than they would otherwise. However, the facilities do take up floorspace which make the viability of such schemes much more finely balanced. Undertaking viability of older person's housing schemes separately would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period". If housing for older people is not assessed separately to market	Affordable housing requirements noted in policy H5. Consultation has been published with Local Plan Viability Assessment dated December 2020. This is dated and has not tested sheltered or extra care housing with respect to Viability. Without the supporting evidence of an up-to-date viability study that tests specialist housing for older people for viability, it is difficult to ascertain if any of the options put forward are realistic or deliverable. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that the older person's housing typologies should be robustly assessed separately. Specialist housing schemes for older people tend to be based around communal facilities and community living and delivered on smaller sites. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing. In assessing the specific housing tenure requirements for older persons housing, it is our experience that this will differ from mainstream housing, and it would be inappropriate for the council to apply generic affordable housing targets to older persons housing. This together with viability considerations is likely to necessitate a bespoke affordable housing policy with a reduced requirement.	Older persons housing is being assessed in the Local Plan viability assessment. However it is not considered necessary to add them as an exception to policy H5 given that they are often classed as affordable housing anyway. The policy requirements are also subject to viability which provides flexibility.	No	
LPR120d	Housing	Councillor Bryony H	84 Salutation Road, Darlington, 'DL3 8JW		Policy		H5 - Affordable Housing (Strategic)		Neutral	a.The change in wording moves the responsibility away from social (cheaper) to affordable (80% of market rate) rent. This conflicts with the government's push of councils to offer more council homes at social rent rates. This change must be struck out, and ensure that more social rent-rate properties are delivered. b.We welcome that the required proportion of affordable housing in the higher-cost wards has increased. However, it must be highlighted that mixed developments are best for positive social outcomes (so lowest cost to council services in the long run), and should be the norm of how new housing is built - with social and affordable housing of a variety of different sizes and types well-mixed amongst market housing. Cash provided in lieu, for off-site delivery of affordable / social housing, should not be allowed, except in exceptional circumstances - this must include the council's own joint venture schemes. c.It seems perverse that 100% of affordable homes offered in lower-cost wards must be for affordable ownership, where it's less likely that people can afford to buy. Wards with highest IMD scores have among the highest proportion of private rental tenure. To rebalance the tenancy mix, we should aim to provide 50% social rent and 50% affordable ownership. This is important as private developers are struggling to find buyers for affordable ownership housing they've already committed to build. d.Land should be allocated for all - but especially social / affordable - housing in sustainable locations, close to existing shops & services, and public / active travel routes, or these services must be delivered as part of the development. Those on lower incomes are less likely to own a car, hence we must ensure they're able to access jobs, services, education, leisure, healthcare etc. otherwise this lack may worsen deprivation. But for reasons of health and climate change, we need to enable a significant shift in transport mode for local journeys within the town, for all. e. We know viability of developments is worse than for a long time, but viability assessment builds in a 20% profit margin - so borderline viability isn't a reason to let developers off social requirements e.g. affordable housing. Robust challenge to viability must be provided. If a development can't be built to provide the essential social requirements, it shouldn't be built, as it doesn't meet Darlington's needs. f.In Policy H5, p.337, we note the current ward names are used. These will need to be reviewed and amended once the Boundary Commission review is complete, to confirm exactly which areas are being referred to for the low, medium and high value areas. Also, areas of the new Garden Villages are beyond the edges of the urban wards. These should be allocated as a new type requiring 30% affordable housing minimum (higher in areas defined as high-value), since Darlington has identified that it requires more affordable homes.	Concern with the change in wording from social to affordable rent. This conflicts with government policy and should be removed. Support for a higher requirement of affordable housing in higher value wards. Housing sites should be mixed in terms of type and tenure. Off-site affordable housing contributions should not be allowed except in exceptional circumstanes. Concern around 100% affordable home ownership requirement in lower value wards. Land should be allocated for all - but especially social / affordable - housing in sustainable locations, close to existing shops & services, and public / active travel routes, or these services must be delivered as part of the development. Borderline viability isn't a reason to let developers off social requirements e.g. affordable housing. Robust challenge to viability must be provided. If a development can't be built to provide the essential social requirements, it shouldn't be built. Ward names need to be amended once the boundary commission review is complete. Garden villages should have a 30% requirement. Objection to the removal of the First Homes policy.	Comments noted. Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. Policies do require an appropriate mix of homes and affordable should be provided on site to provide mixed and balanced communities. There are some exceptions which are subject to certain criteria and justification. The tenure required in low value areas factors in what is viable. Profit inputs for viability assessments are usually set at 20% which is in line with planning guidance. The percentage requirement for affordable housing at the Garden Villages will be informed by the whole plan viability assessment. The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, has been removed via footnote 31 of the NPPF. As such the Council cannot insist on the inclusion of First Homes in affordable provision but this tenure is still accepted as an affordable home ownership product.	No	
LPR041e	Housing	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Policy		H6 - Exception Sites (strategic)		Object	The interrelationship between this policy, H3 and H5 needs to be worked through. Additionally it is suggested that rural exception sites be allocated in the Plan, in a Plan led system it being part of the purpose of the Plan to identify and respond to needs.	The interrelationship between this policy, H3 and H5 needs to be worked through. Additionally it is suggested that rural exception sites are allocated in the Plan. The purpose of the plan is to identify and respond to needs.	The Council considers that the approach across these policies and SD3 Development Limits is appropriate and has previously been found sound in the adopted Local Plan. Rural exception sites were not allocated in the existing plan and this approach was considered acceptable at examination. As such no exception sites are proposed for allocation.	No	
LPR103b	Housing	Duncan Peake	Raby Estates	Hanna Mawson, Pegasus Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne, NE1 6AE	Policy		H6 - Rural Exception Sites		Object	The restrictive nature of residential development is further displayed in Policy H6 (Rural Exception Sites), which sets out that 'Affordable housing schemes closely related to the identified development limits of the service villages and rural villages will be permitted' if they meet criteria a. to e. and that '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.' It is to be noted that Policy H2 (Housing Allocations) details the sites within the Borough allocated for residential development, however, there is only one allocated under the 'Villages' location in Heighington (site reference: 95) with all other allocations proposed in the 'Urban Extension' and 'Urban Area'. See submission	Concerns raised in respect of policy SD2 (Settlement Hierarchy), policy H6 (Rural Exception Sites) and Policy H7 (Residential Development in the Countryside) in meeting the soundness tests as per para 36 of the NPPF. It is considered that these Policies are overly restrictive to development in rural areas and do not recognise housing needs of rural communities. The policies as drafted risk preventing opportunities for sustainable housing growth outside of the Darlington Urban Area. Further, whilst Piercebridge for example is identified as a Rural Village, development opportunities on land adjacent to the settlement and other rural villages are heavily constrained by these Policies due to the emphasis on delivering affordable units and the limited residential development types. Sympathetic development would support the sustainability of these communities and accordingly a more positive approach to development in rural areas should be considered. Recommended that a policy similar to policy 6 of the County Durham Plan is included in the emerging Darlington Local Plan which covers development of sites which are not allocated within and outside built up areas.	Policies SD2, H6 and H7, outline the locational strategy for new development in the borough and restrict development beyond development limits. The approach was found sound for the current Local Plan and therefore has been carried forward into the reviewed draft. No changes are therefore considered necessary.	No	
LPR029a	Housing	David Phillips	Butterfly Conservation North East		Section		H6 - Rural Exception Sites		Support	6.6.1-6.6.3 Policy H5 & H6. Very welcome that Darlington Borough Council recognises there is a significant need for affordable housing, however, the Council must ensure that affordable housing remains a priority within this Local Plan and that targets are not watered down by developers once planning permission has been secured.	Welcome that the Council recognises there is a significant need for affordable housing, however, the Council must ensure that affordable housing remains a priority within this Local Plan and that targets are not watered down by developers once planning permission has been secured.	The Council does recognise that there is a significant need for affordable homes in the borough. Delivery of these homes is being pursued through various routes. It should be noted that the percentage requirements of policy H5 are subject to site viability. Please see the final paragraph of the policy.	No	
LPR051k	Housing	Chris Martin	HBF		Policy		H7 - Residential Development in the Countryside		Object	Policy H7 is related to Policy SD3 in that Policy SD3 seeks to facilitate development within development limits, whilst Policy H7 seeks to manage development outside of development lim-its (what the Council defines as open countryside). The HBF considers there is merit in combining these two policies given how they relate to one another. Our comments made in relation to Policy SD3 also apply to Policy H7 in that not all land beyond development limits should be categorised in the same restrictive way and to do so will unnecessarily restrict opportunities for windfall development over the plan period.	HBF suggest to combined policies H7 and SD3 given they are related. Comments made in relation to Policy SD3 also apply to Policy H7 in that not all land beyond development limits should be categorised in the same restrictive way and to do so will unnecessarily restrict opportunities for windfall development over the plan period.	The approach in policy SD3 and H7, in terms of restricting development beyond development limits, was found sound for the current Local Plan and therefore has been carried forward into the reviewed draft. No changes are therefore considered necessary.	No	
LPR059 & 60h	Housing	Dominic Crowley	Lichfields		Policy		H7 – Residential Development in Countryside (strategic)		Object	Hallam Land has provided comments on Policy SD3 with respect to settlement boundaries and the importance of acknowledging that some sites outside settlement limits could provide appropriate opportunities for sustainable development, such as Hallam Land's site to the west of Roundhill Road in Hurworth (SHLAA Site Ref: 449). Policy H7 should draw the same distinction in this respect (i.e. the difference between sustainable edge of settlement sites, and those which would result in isolated homes in the countryside) to ensure sustainable windfall opportunities to deliver high-quality residential development are not unduly constrained.	Comments provided on Policy SD3 with respect to settlement boundaries and the importance of acknowledging that some sites outside settlement limits could provide appropriate opportunities for sustainable development, such as Hallam Land's site to the west of Roundhill Road in Hurworth (SHLAA Site Ref: 449). Policy H7 should draw the same distinction in this respect (i.e. the difference between sustainable edge of settlement sites, and those which would result in isolated homes in the countryside) to ensure sustainable windfall opportunities to deliver high-quality residential development are not unduly constrained.	The approach in policy SD3 and H7, in terms of restricting development beyond development limits, was found sound for the current Local Plan and therefore has been carried forward into the reviewed draft. No changes are therefore considered necessary.	No	
LPR067 & 68i	Housing	Georgina Cox	Gladman		Policy		H7 – Residential Development in Countryside (strategic)		Neutral	See submitted attachment. Policy H7 and policy SD3 are interrelated in restricting development outside of settlement limits and within the open countryside. Gladman would consider the policies should be combined to avoid confusion. Alternatively, Gladman's comment for policy SD3 apply also for H7.	Policy H7 and policy SD3 are interrelated in restricting development outside of settlement limits and within the open countryside. Gladman would consider the policies should be combined to avoid confusion. Alternatively, Gladman's comment for policy SD3 apply also for H7.	The approach in policy SD3 and H7, in terms of restricting development beyond development limits, was found sound for the current Local Plan and therefore has been carried forward into the reviewed draft. No changes are therefore considered necessary.	No	
LPR103c	Housing	Duncan Peake	Raby Estates	Hanna Mawson, Pegasus Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne, NE1 6AE	Policy		H7 - Residential Development in the Countryside		Unknown	Following on from this, Policy H7 addresses Residential Development in the Countryside, stating that: 'New isolated dwellings in the countryside will be avoided. New permanent dwellings will only be permitted where they meet criteria set in national policy'. Policy H7 then establishes the set of criteria that proposed residential development in the countryside will need to meet to be acceptable, however, the Policy is restricted to certain residential development types, including proposals for rural workers dwellings, the replacement of residential buildings in the open countryside, extensions to existing dwellings, and the conversion or change of use of buildings to residential use. See submission	Concerns raised in respect of policy SD2 (Settlement Hierarchy), policy H6 (Rural Exception Sites) and Policy H7 (Residential Development in the Countryside) in meeting the soundness tests as per para 36 of the NPPF. It is considered that these Policies are overly restrictive to development in rural areas and do not recognise housing needs of rural communities. The policies as drafted risk preventing opportunities for sustainable housing growth outside of the Darlington Urban Area. Further, whilst Piercebridge for example is identified as a Rural Village, development opportunities on land adjacent to the settlement and other rural villages are heavily constrained by these Policies due to the emphasis on delivering affordable units and the limited residential development types. Sympathetic development would support the sustainability of these communities and accordingly a more positive approach to development in rural areas should be considered. Recommended that a policy similar to policy 6 of the County Durham Plan is included in the emerging Darlington Local Plan which covers development of sites which are not allocated within and outside built up areas.	Policies SD2, H6 and H7, outline the locational strategy for new development in the borough and restrict development beyond development limits. The approach was found sound for the current Local Plan and therefore has been carried forward into the reviewed draft. No changes are therefore considered necessary.	No	

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LPR052g	Housing	Louise Tait	Environment Agency		Site / Policy	Ref. 185 Burtree Garden Village	H11 - Burtree Garden Village	Housing	Neutral	The West Beck flows through the middle of this land allocation and this section of the West Beck is an ordinary watercourse. Development in flood zone 3 should be avoided and we strongly recommend housing is located within areas of lowest flood risk. There are some sections of the West Beck which are susceptible to significant increase in floodplain when climate change is accounted for. There is a large swath of floodplain at the very north of the allocation along the West Beck. In the southern boundary the West Beck is culverted, which presents additional flood risk. There is another short ordinary watercourse north of High Faverdale Farm, which joins the West Beck within the allocation boundary. Although, there are no flood zones along this small channel, its potential to impact flooding along the West Beck should be fully considered when developing in this area. This allocation is located within 250 metres of a known closed landfill site. The former landfill site is called Little Whessoe Farm Landfill Site and is located at Burtree Lane, Darlington. The licence (Licence Reference number EAWML 67037 (DUR 034A)) was issued on 13 May 1977 and surrendered on 22 March 1989. Our records indicate the site accepted household, commercial, construction and inert wastes along with liquid sludge wastes.	Comment highlights flood risk associated with West Beck and its tributories within the Burtree Allocation and notes the importance of avoiding development in areas of high flood risk. It also highlights that the allocation is within 250m of a known closed landfill site at Little Whessoe Farm.	Burtree is a large allocation requiring an agreed masterplan. As part of this process development is focussed away from areas of high flood risk such as West Beck. Comments regarding Little Whessoe Farm Landfill Site are noted.	No	None
LPR123	Housing	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		H11 – Burtree Garden Village – Site Allocation (strategic)		Support	Its purpose is to support the Local Plan representation by considering the likely impacts of Phase 2 on the local highway network, the strategic road network and the wider movement strategy for Burtree Garden Village. Please see document attached.	The applicant has provided a detailed pdf response covering matters related to Burtree Garden Village and Policy H11. It notes that, while Policy H11 has been updated to reflect the now approved masterplan and the planning consent for the first phase to 2036 (22/01342/FULE), further changes are required. HE/HLL suggest the amount of alocated development should be increased to 2225 dwellings to account for a cell previously identified for employment now bringing forward 2225 dwellings. Additionally suggest adjusting the employment figure to 19.4 hectares to align with the upper parameter figure that HLL could seek to deliver within the forthcoming plan period. HE/HLL object to the sepration of the site into housing and emplyment allocations and requests that they be recombined. The comment also sets out consideration to take into account if this approach is carried forward. The comment states that Homes England and Hellens Land are supportive of the changes made to Criterion g) ii) of Policy H11. However, they would prefer a complete revision of Criterion g). This generally includes removing all reference to Burtree Lane. New wording is also suggested for Para. 6.10.8 to remove the possibility of off-site contributions to the Stockton & Darlington Railway route.	The Council has determined that returning to a mixed use allocation at Burtree Garden Village is the preferable method for allocating the site. As such the two proposed allocation from the Reg. 18 Plan will be recombined. The 2000 home figure is an approximate yield and is not considered a cap - this is explained in Policy H2. The Council will consider the suggested wording provided for Criterion G and will make appropriate updates. The Council agrees that a defined position between DBC, National Highways, and the Development Partners would be preferable. However, the Council is not in a position to establish this position at this time. The proposed approach as noted by the applicant proposes to determine the permissible amount of development to 2042 via an updated masterplan and the technical work associated with it. The Council would be happy to rework the policy if and when a agreed position is confirmed.	Yes	Adjust Policy H11 and E2 to a figure of approximately 19.4 hectares. Adjust wording for Criterion G.
LPR125&126f	Housing	Josh White	Natural England		Policy		H11 - Burtree Garden Village - Site Allocation		Support	We welcome Policies H 10 and H 11, which include robust green infrastructure requirements; however, these could be strengthened by explicitly requiring masterplans to demonstrate alignment with LNRS priority areas and wider ecological networks beyond site boundaries.	Comment suggest explicitly requiring the masterplans for the Skerningham and Burtree allocations to demonstrate alignment with LNRS Priority Areas and with wider ecological networks beyond site boundaries.	The Council will consider how this recommendation can be introduced to Policies H10 & H11.	Yes	Consider how to require the masterplans for the Skerningham and Burtree allocations to demonstrate alignment with LNRS Priority Areas and with wider ecological networks beyond site boundaries.
LPR123a	Housing	Martin Bonner	Hellens Land and Home	Martin Bonner, Savills, The L	Policy	H11 – Burtree Garde	H11 – Burtree Ga	Policy H11 introduction, Masterplan Framework & Proposals Map	Neutral	Policy H11 has been updated to reflect the now approved masterplan and the aforementioned planning consent for the first phase of allocated development to 2036 (22/01342/FULE). Nonetheless, further changes are required to accommodate potential future development proposals.	Notes that further changes are required to accommodate future development proposals.	See detailed response to LPR123.	No	None
LPR123b	Housing	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	H11 – Burtree Garden Village – Site Allocation (strategic)	H11 – Burtree Garden Village – Site Allocation (strategic)	Policy H11 – Criterion g) enhancements to Burtree Lane		HLL/HE are supportive of the proposed amendments to criterion g) ii) of the policy through reference to a "suitable alternative route that would fulfil the same strategic purpose" as a direct route over the Bishop Line. It has been established previously via the approved masterplan that a pedestrian cycle route over the existing road bridge, or over the railway line more generally, is not deliverable and an eastern connection adjacent to the Stockton and Darlington Railway would comprise an aspirational, secondary route. This is due to the need for work to take place beyond HLL/HE control on the longer term delivery of a bicentennial, railway focused active trawel route. Until that route is in situ, with timeframes for this currently unspecified, any new eastern connection beyond the site boundary cannot be relied upon for policy compliance, with Burtree Garden Village simply facilitating a potential future connection to adjoining land. It is important that there is some clarity on this within the document, given the emphasis on an eastern connection and associated policies associated with the delivery of access along the Stockton and Darlington Railway. As a starting point the strong preference for HLL/HE would be for a wholesale revision to criterion g) to simplify the requirement and avoid unnecessary policy conflicts regarding physical constraints on Burtree Lane and the railway line that are better understood in 2026 than they were in 2018. This revision would comprise:	The comment states that Homes England and Hellens Land are supportive of the changes made to Criterion g) ii) of Policy H11. However, they would prefer a complete revision of Criterion g). A proposed revision is set out in their detailed response (LPR123).	See detailed response to LPR123.	See detailed response to LPR123.	See detailed response to LPR123.
LPR123c		Martin Bonner	Hellens Land and Home	Martin Bonner, Savills, The L	Policy	H11 – Burtree Garde	H11 – Burtree Ga	Policy H11 – Updated masterplanning requirements		HLL & HE agree with officers regarding the need for an updated masterplan and infrastructure delivery plan. The green corridors as referenced in the policy update are already captured within the masterplan as currently approved. It is necessary however, to comment on the final paragraph of the policy which previously contained permissible amounts of development within the plan period, namely 750 dwellings and 20 hectares (net) employment to 2036, with any further development requiring a review of infrastructure requirements. The Regulation 18 draft proposes to determine the permissible amount of development to 2042 via an updated masterplan and the technical work associated with it. Whilst this flexibility is welcomed by HLL/HE it is recognised that for plan making, masterplanning and determining planning applications alike, an agreed position is required with both Darlington Borough Council and National Highways on the anticipated amount of remaining allocated development to be delivered and mitigated within this updated plan period based on submitted trajectories.	Comment supports the need for an updated masterplan and infrastructure phasing plan and welcomes the flexibility regarding the removal of the 750 dwelling cap. However, they suggest that an agreed position is required with both Darlington Borough Council and National Highways on the anticipated amount of remaining allocated development to be delivered and mitigated within this updated plan period.	The Council agrees that a defined position between DBC, National Highways, and the Development Partners would be preferable. However, the Council is not in a position to establish this position at this time. The proposed approach as noted by the applicant proposes to determine the permissible amount of development to 2042 via an updated masterplan and the technical work associated with it. The Council would be happy to rework the policy if and when a agreed position is confirmed.	No	None
LPR127, 128 & 129r	Housing	Ros Kain	Historic England		Site	Site 185 Burtree Garden Village			Neutral	See App B submission, This is an existing strategic allocation, formerly known as Greater Faverdale. The site has been renamed Burtee Garden Village with two allocations covering the same site area. The policy reference (H11) is unaltered. The total residential yield over the Plan period remains the same. A site-specific Design Code SPD was adopted in July 2022. A masterplan and infrastructure phasing plan has subsequently been agreed. The site boundary now includes an area for employment use. Policy E2 has been amended to reflect this. Site SD6 is proposed for 13.2 ha of employment use. Our only comment relates to the accuracy of the HIA considering the partial change from residential to employment use. The HIA dates to 2019, as referenced in the policy text, and it informed design and layout. DBC should consider whether the proposed employment use, earmarked for the east section of the site, could have the potential to have a greater impact on heritage assets than residential use. Scale, massing, layout, infrastructure and traffic generation for example. Suggested change: Clarify if the Design Code SPD, masterplan and phasing plan cover the employment use (site SD6) We support the retention of the following text specific to the historic environment but ask DBC to review and amend the 2019 HIA The Historic Environment and Site Allocations in Local Plans Proposals will be required to conserve, and where appropriate enhance designated and non- designated heritage assets within and in the vicinity of the site including their setting in accordance with policy ENV1. The design and layout should be carried out in accordance with the recommendations of the Darlington Local Plan Heritage Impact Assessment (2019) to avoid and minimise harm and provide opportunities for enhancement where appropriate. We suggest the following amendment to the text to ensure delivery of the SBDR walking and cycling route. (j.vii) The historic route of the Stockton & Darlington Railway falls within the site. The route of the historic track bed, or an alternative adjacent to it where the original track bed is live railway, must be retained and incorporated into the development layout. It must be legible. publicly accessible and subject to appropriate hard and soft landscaping and interpretation. This is to ensure the significance of the heritage asset is conserved, enhanced and can be celebrated by future generations.	Notes that the Heritage Impact Assessment for the Burtree allocation was conducted in 2019 and suggests viewing this in light of the seperation of the employment area from the allocation. Additionally suggest a specific change to ensure delivery of the Stockton & Darlington walking and cycling route which crosses the site: *'The historic route of the Stockton & Darlington Railway falls within the site.The route of the historic track bed, or an alternative adjacent to it where the original track bed is live railway, must be retained and incorporated into the development layout. It must be legible. publicly accessible and subject to appropriate hard and soft landscaping and interpretation. This is to ensure the significance of the heritage asset is conserved, enhanced and can be celebrated by future generations'.*	The comments regarding the HIA are acknowledged, the Policy Team will review the HIA to see if any updates are required. The draft Local Plan currently states that the development will provide a network of connected and good quality green and blue infrastructure that *incorporates improved pedestrian access and interpretation alongside the Stockton and Darlington Railway* (see Policy ENV 2). The original route of the S&DR in this location is still a live railway. It is considered that the current wording of the policy taken in context with the other listed requirements in the policy already covers the suggested wording provided by Historic England.	Yes	Review HIA.
LPR029b	Housing	David Phillips	Butterfly Conservation North East		Site	185. Burtree Garden Village			Object	The scale of committed development and the number of proposed new dwellings including Burtree Garden Village is noted. This development on the rural-urban edge will make it more difficult for people to access green spaces and the countryside. Indeed, the continued erosion of green spaces through cumulative development within the borough significantly damages the environment, changes the character and distinctiveness of the landscape and damages residents' quality of life as well as well as significantly increasing pressure on remaining nearby green spaces. This draft plan therefore needs to recognise a requirement for quality green space including wildlife friendly green space to promote health and well-being and reduce health inequalities, particularly where proposed major development will result in the countryside being pushed further away.	Concerns regarding committed and proposed development including Burtree Garden Village. Negative impacts on the countryside, environment, landscape and quality of life. Development on the rural-urban edge will it make it more difficult for people to access green spaces. Need for quality green spaces.	Comments noted. Housing allocations have been selected to minimise landscape and countryside impacts. A sustainability appraisal has informed this process. A number of sites are also existing allocations from the current Local Plan and were previously considered suitable/sound for development via an independent examination. Environmental policies within the plan also provide protection and set out requirements for the provision of green space.	No	

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LPR069c	Housing	Jude Murray	Resident		Section			6. Housing	Object	This Plan is again not based upon local housing need. It does not make any requirements of housing for an ageing population or for social housing, in fact it has removed 'social' housing and replaced it with 'affordable' housing. I object to this change. Darlington needs 'social' housing and this Plan should do more to specify that. The plan also does not do enough to encourage brownfield site development and instead has over allocated greenfield sites, presumably because these are cheaper to develop than brownfield sites. This will lead to significant areas of deprivation where no investment in housing has taken place. I object to the over allocation of greenfield sites in this Plan.	General concerns and objections raised around housing policy. The plan is not based upon local housing need. It does not have requirements for an ageing population or for social housing. It has infact removed 'social housing' and replaced it with 'affordable housing'. Darlington needs 'social housing' Not enough done to encourage brownfield site development and has over allocated greenfield sites. This will lead to significant areas of deprivation where no investment in housing will take place.	The Council has followed national planning practice guidance in assessing local housing need. A Local Housing Needs Assessment will be published at the next stage of plan preparation. There are policy requirements which address the ageing population with regards to housing. For example the M4(2) and M4(3) standards within policy H3 assist in addressing the needs of older people and those with disabilities. Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. The majority of the housing allocations have been included from the current Local Plan which were found to be sound at examination. A large proportion are greenfield sites as housing allocations need to be deliverable/developable. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable and Local Plans have failed in the past where they have been relied upon. There are some brownfield sites in the draft plan and the Council is still supportive of other brownfield sites coming forward for development providing they are in a suitable location. Allocations have been put forward which are considered to be the most suitable and sustainable for housing development. Site selection has been informed by detailed site assessments within the HELAA and SA.	No	
LPR081b	Housing	J Murray	Secretary - Whinfield Residents Association inc Friends of Beech Wood		Section			6. Housing	Object	The Plan, like the previous Plan vastly over-provides for local housing need. It is based upon deliverability and not local need. The housing numbers should therefore be revised in light of local need over the last 10yrs and future projected need. This may have changed since the last Local Plan and therefore needs re-visiting. The number and type of housing also needs to align more with local need. Darlington has an ageing population and a requirement for social housing – this Local Plan needs to do more to encourage this kind of housing need. There should be no wording change from 'social' to affordable housing. Affordable housing is not the same as 'social' housing and rents for social housing are generally less than those of affordable housing. Given the need for social housing this wording should not be changed and should be reversed to prioritise social rent. Again, this Plan, like the previous Plan, over allocates greenfield sites and does nothing to force the developers to develop brownfield sites. This will inevitably lead to areas of the town becoming 'ghost towns' with no investment being made into brownfield housing sites. This Plan should re-consider the amount of greenfield sites it allocates. The delivery of local services, particularly in Skerningham Garden Village, are allocated within the plan. Whilst these are allocated, there are a number of developments across Darlington where these have not been delivered and the Council are powerless to force developers to deliver them despite approving planning applications for them. The Council must build in mechanisms to guarantee these local services are delivered for all new developments.	General concerns and objections raised around housing policy. The plan is not based upon local housing need. It does not have requirements for an ageing population or for social housing. It has infact removed 'social housing' and replaced it with 'affordable housing'. Darlington needs 'social housing'. Not enough done to encourage brownfield site development and has over allocated greenfield sites. This will lead to significant areas of deprivation where no investment in housing will take place. Concerns that housing sites will not deliver infrastructure and local services required by the plan or via planning permissions.	The Council has followed national planning practice guidance in assessing local housing need. A Local Housing Needs Assessment will be published at the next stage of plan preparation. There are policy requirements which address the ageing population with regards to housing. For example the M4(2) and M4(3) standards within policy H3 assist in addressing the needs of older people and those with disabilities. Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. The majority of the housing allocations have been included from the current Local Plan which were found to be sound at examination. A large proportion are greenfield sites as housing allocations need to be deliverable/developable. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable and Local Plans have failed in the past where they have been relied upon. There are some brownfield sites in the draft plan and the Council is still supportive of other brownfield sites coming forward for development providing they are in a suitable location. Allocations have been put forward which are considered to be the most suitable and sustainable for housing development. Site selection has been informed by detailed site assessments within the HELAA and SA. Essential infrastructure requirements will be secured via planning permissions and s106 legal agreements.	No	
LPR084f	Housing	Tony Gillam	Resident		Section			6. Housing	Object	Housing Need & Distribution The Plan significantly over provides housing relative to local need. Current figures reflect deliverability rather than genuine need. Government should allow LPAs to set locally determined housing numbers. Over allocation of greenfield sites undermines brownfield regeneration and risks creating a "doughnut of deprivation" around the town centre. Large sites should be subdivided to reduce lender exposure and improve build out rates. Windfall averages should be deducted from housing need. More smaller homes and bungalows are required to meet the needs of an ageing population and reduce under occupation.	General concerns and objections raised around housing policy. The plan over provides housing relative to local need. Over allocation of greenfield sites undermines brownfield regeneration and risks creating deprivation around the town centre. Large sites should be subdivided to reduce lender exposure and improve build out rates. Windfall averages should be deducted from housing need. More smaller homes and bungalows are required to meet the needs of an ageing population and reduce under occupation.	The Council has followed national planning practice guidance in assessing local housing need. A Local Housing Needs Assessment will be published at the next stage of plan preparation. The majority of the housing allocations have been included from the current Local Plan which were found to be sound at examination. A large proportion are greenfield sites as housing allocations need to be deliverable/developable. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable and Local Plans have failed in the past where they have been relied upon. There are some brownfield sites in the draft plan and the Council is still supportive of other brownfield sites coming forward for development providing they are in a suitable location. Allocations have been put forward which are considered to be the most suitable and sustainable for housing development. Site selection has been informed by detailed site assessments within the HELAA and SA. Large sites are being subdivided by landowners and developers. They are being brought foward in smaller parcels; e.g. West Park, Burtree GV and Skerningham GV. There is a small sites (less than 10 units) windfall allowance factored into the housing trajectory. An appropriate mix of homes is encouraged via policy H3 Housing Mix which includes smaller homes. There is the M4(2) and M4(3) requirements within the policy which assist in meeting the housing needs of older persons and those with disabilities. Securing a proportion of homes which meet higher accessibility standards.	No	
LPR086b	Housing	Roger Fitzpatrick-O	Resident		Section			6. Housing	Object	This Plan does not make any requirements of housing for an ageing population or for social housing, in fact it has removed 'social' housing and replaced it with 'affordable' housing. I object to this change. The plan also does not do enough to encourage brownfield site development and instead has over allocated greenfield sites, presumably because these are cheaper to develop than brownfield sites. This will lead to significant areas of deprivation where no investment in housing has taken place. I object to the over allocation of greenfield sites in this Plan.	This Plan does not make any requirements of housing for an ageing population or for social housing, in fact it has removed 'social' housing and replaced it with 'affordable' housing. I object to this change. The plan also does not do enough to encourage brownfield site development and instead has over allocated greenfield sites. This will lead to significant areas of deprivation where no investment in housing has taken place.	There are policy requirements which address the ageing population with regards to housing. For example the M4(2) and M4(3) standards within policy H3 assist in addressing the needs of older people and those with disabilities. Draft policy H5 has introduced a social rent category within the tenure split to be in line with government policy and the requirements of the NPPF to specify the type of affordable housing required. The majority of the housing allocations have been included from the current Local Plan which were found to be sound at examination. A large proportion are greenfield sites as housing allocations need to be deliverable/developable. Brownfield sites can be more difficult and costly to develop as such their deliverability is sometimes questionable and Local Plans have failed in the past where they have been relied upon. There are some brownfield sites in the draft plan and the Council is still supportive of other brownfield sites coming forward for development providing they are in a suitable location. Allocations have been put forward which are considered to be the most suitable and sustainable for housing development. Site selection has been informed by detailed site assessments within the HELAA and SA.	No	
LPR133b	Housing	Katherine Dobson	NWL							We note from recent discussions with Darlington Council that the housing delivery targets have been ambitious throughout the current adopted plan and that there are no requirements to increase their housing targets. We note the expected housing delivery in the new plan period and we note that the spatial distribution will be largely limited to strategic extensions around the main urban area and larger service villages which we support. We are seeking to work closely with all of our Local Planning Authority stakeholders to support robust planned development which will enable us to accurately assess investment needs and seek funding accordingly.	We note that the housing delivery targets have been ambitious throughout the current adopted plan and that there are no requirements to increase their housing targets. We note the expected housing delivery in the new plan period and we note that the spatial distribution will be largely limited to strategic extensions around the main urban area and larger service villages which we support. We will work closely with LAs to support planned development which will enable us to accurately assess investment needs and seek funding accordingly. For some of the strategic housing allocations identified and already part committed, it is important	Comments noted.	No	

LPR reference (starting at LPR021)	Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Policy Number	Policy Details	Section Details	Object /Support/ Neutral	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LPR116a	Housing	Jack Conroy	Tivlot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	2	H10 - Skerningham - site allocation (strategic)		Support	See submitted document entitled Darlington Local Plan Review Regulation 18 Consultation Land at Bishopton Lane, Great Burdon.	A detailed comment has been submitted by Savills on behalf of Tivlot Way Investments one of the three principle site promotors within the Skerningham allocation. They have noted the following points: •The supporting text at Paragraph 6.11.13 states that "With the golf club remaining in situ, around 55% of the site area is expected to be retained and enhanced as accessible green infrastructure, managed agricultural land and the existing golf club". Allocating Tivlot Way's land holding as employment would in effect leaves only 45% of the wider site area to accommodate the 4,500 homes to be delivered under Policies H2 and H10. •Para. 36 of the NPPF requires Local Plans to be effective a deliverable over the plan period. They suggest that should the delivery of housing be prejudiced by the new employment allocation then then Policy H10 would not be effective and thus would likely not be found sound at examination. •Suggest that re-allocating Tivlot Way's land holding would effectively sterilise 63 hectares of residential land and that any shortfall in housing supply at Skerningham would severely impact the Council's housing land supply. •Highlight that Tivlot Way control the delivery of part of the proposed local distributor road and that an employment allocation could make delivery of the road unviable, thereby holding up delivery of the other residential development. In contrast, Tivlot Way state that their residential development would be able to fully fund their section of the Distributor Road. •Tivlot Way confirm they will provide a funding on a pro-rata basis to contribute to the delivery of the bridge over the East Coast Mainline. In summary, Tivlot Way request that the new employment allocation be removed and the land in question be returned to a housing allocation. In addition, Tivlot Way have provided specific feedback on the retained triggers for the	Tivlot Way Investments became in involved in Skerngham Garden Village following the adoption of the current plan and late in the development of the Skerngham Garden Village Comprehensive Masterplan and Design Code, the requirements for which were detailed in Policy H10. The Council has held discussion with Tivlot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fulfil the principles of the garden communities programme and Tivlot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. The Council therfore intends to re-integrate the two allocations proposed in the Reg. 18 Plan to form one mixed use allocation - with the location of the proposed employment area within the Tivlot Way site to be shown on the Masterplan Framework. The triggers within H10 Criterion (g)(iii - iv) are based on highways modelling conducted for the adopted plan. The Council is willing to consider updating these triggers subject to suitable agreed highway modelling. As such modelling has not yet been agreed, the Council intends to maintain the current trigger points on highway grounds.	Yes	Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.
LPR077a	Housing	Sarah Harris	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	Clarify whether the Local Plan—particularly the Skerningham allocation—is now dependent on the delivery of the Darlington Northern Link Road (DNLR). The previous statement confirming that the Local Plan was not reliant on the DNLR has been removed. Given that the DNLR directly affects the Skerningham Design Code and Masterplan, the route of the DNLR must be determined prior to the finalisation of the Local Plan Review and before any planning applications are considered, as development proposals will be materially impacted. Viability of the Skerningham Allocation Require a reassessment of the overall viability of the Skerningham site. The DNLR Options Assessment Report (April 2026) indicates a substantial increase in estimated costs—from approximately £44 million to £140 million for the road and bridge alone. This significant escalation raises serious concerns about the deliverability and financial viability of the wider allocation. Provision for Golf Club Relocation Reinstate the indicative "pink star" marker within the alternative Masterplan (Figure 6.2) to identify a suitable relocation site for the Golf Club, should relocation be required. This is necessary to demonstrate that the site can accommodate a replacement course on land south of the woodland, avoiding areas designated for Biodiversity Net Gain or nutrient neutrality (which must be safeguarded for a minimum of 30 years). If no suitable relocation land can be identified, the Golf Club site should be removed from the Skerningham allocation.	Questions whether the delivery of the Local Plan - particularly the Skerningham allocation - is dependent on the proposed Darlington Northern Link Road (DNLR). Notes the route of the DNLR will impact the Skerningham Design Code SPD & the agreed Masterplan. Suggests the route of the DNLR must be decided before the Local Plan Review is finalised. Additionally, considers a reassessment of the viability of the Skerningham allocation is required following the cost pressures shown in the DNLR Options Assessment Report (April 2026). Finally, requests the 'pink star' on the Framework Masterplan (Figure 6.2) be reinstated to show an indicative location for the relocation of Darlington Golf Club.	While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not reliant on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable by the site promoters, and the cost estimates for key infrastructure have been checked by the Council. The 'pink star' relocation marker has been removed as it is unlikey the golf course could now re-locate to the suggested area, which forms part of a package of biodiversity net gain and neutrient neutrality measures being brought forward as part of application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming avaialble in the future.	Yes	References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.
LPR048	Housing	David Clark - submis	Resident		Policy	10	H10. Skerningham		No answer	In short, the current adopted Darlington Local Plan (2016–2036) is structured so that the initial and substantial delivery of Skerningham Garden Village is not dependent on the completion of the Darlington Northern Link Road (DNLR). See submission with focus on DNLR.	The comment notes, and sets out examples of how the current Local Plan is structured so that the delivery of Skerningham Garden Village is dependent on the delivery of the Darlington Northern Link Road (DNLR). The Local Plan requires a 'local distributor road' and does not list the DNLR as a precondition for housing being built. The comment objects to the removal of wording stating that the delivery of Skerningham Garden Village is not reliant on the DNLR. The comment also suggest that the following wording from H10 g.i. has been removed from the updated plan *'Prior to the occupation of the first dwelling on land on the western part of the allocation (between the A167 and the East Coast Mainline) the section of the local distributor road between the A167 and the primary development access point shall be delivered.* Secondly, the comment notes that H10 g. iii. states that *'Development of the initial phases of development on the eastern part of the allocation will be accessed via Barmpton Lane and/or Bishopton Lane. Prior to the occupation of between the 200th and 450th dwelling on the eastern part of the allocation the section of the local distributor road between Barmpton Lane and Bishopton Lane shall be delivered'.* The comment notes this as part of Phase 1 of the Garden Village, but that the site developers do not intend to deliver this until Phase 2 – thereby contradicting the Local Plan. The comment also raises an issue of cost/viability disparities between the site developers viability work for the Local Distributor Road and the TVCAs Options Appraisal Report for the DNLR.	While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not reliant on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable by the site promoters. References to, and triggers for, the delivery of the Local Distributor Road remain in Policy H10. The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict occupations beyond 449 dwellings by planning condition until the first section of the distributor road is completed. The Darlington Northern Link Road and the Skerningham Distributor Road are currently different schemes with different requirements. Cost estimates cannot be easily compared between the two. The Council has examined the costs associated with key infrastructure for the distributor road provided by Skerningham Estates and is satisfied they are robust and that the scheme remains viable as a whole.	No	None
LPR052h	Housing	Louise Tait	Environment Agency		Site / Policy	10	H10 - Skerningham Garden Village	Housing	Neutral	Site ref: 251, Skerningham and Policy 10 Skerningham The River Skerne has two significant floodplain areas in this site allocation at the confluence with the ordinary watercourse on northern boundary and the horseshoe meander at Elly Hill. The ordinary watercourse on the northern boundary culverts under the east coast mainline railway, which is subject to significant flooding either side. A number of small drainage channels flow into this ordinary watercourse from the west providing unknown flood risk. Two other ordinary watercourses to note are at Hutton Plantation and east of Darlington Golf Course. The risk of flooding from these rivers is unknown but may impact the Skerne downstream. The Skerne is an Environment Agency (EA) maintained channel between the A1M (upstream) and Burdon Gardens (downstream). These are considerations for any development with the site allocation. We strongly recommend housing is located within areas of lowest flood risk. This allocation is located within 250 metres of a known closed landfill site that is producing landfill gas. It is called Barmston Quarry Landfill Site. The environmental permit was originally issued by Durham County Council as Waste Disposal Licence DUR 160. The site accepted non-hazardous industrial wastes and wastes from the construction industry and is now regulated by the Environment Agency via environmental permit (reference: EPR/JP3493NS). The site no longer accepts waste. The closed landfill site is restored and in aftercare. The environmental permit remains in force.	The Enviornment Agency (EA) note that the River Skerne has two significant floodplain areas within the boundary of the Skerningham Allocation. These are where the Skerne is joined by a culverted watercourse by the East Coat Mainline and at the meander at Ely Hill. Additionally there are several small watercourses that join the Skerne as it passes through the allocation boundary. The River Skerne is an Environment Agency maintained channel between the A1M (upstream) and Burdon Gardens (downstream). The EA recommends housing should be located in the areas of lowest floodrisk. Seperately the EA notes the Skerningham allocation is within 250metres of Barmston (possibly Barmpton) Quarry Landfill Site - a closed landfill site that is producing landfill gas. The environmental permit was originally issued by Durham County Council as Waste Disposal Licence DUR 160. The site accepted non-hazardous industrial wastes and wastes from the construction industry and is now regulated by the Environment Agency via environmental permit (reference: EPR/JP3493NS).	The comments regarding Flood Risk from the River Skerne and connected watercourses are acknowledged. Policies DC2 and H10 direct development away from areas of high flood risk. Subsequent applications will need to consider this isse, along with the landfill site noted in the comment.	No	None
LPR053g	Housing	Patricia Meredith	Resident		Site	10			Object	"The Plan requires clarity on the boundaries of "high value" land and the affordable housing triggers associated with it. In addition, stronger evidence is needed to justify employment land near Great Burdon. The Barmpton landfill site requires clear safety standards, minimum distances, and investigative work. Especially bearing in mind the hissing of gasses from the outlet pipes. Surely common sense should prevail, who on earth would approve it suitable for housing? I strongly object to the Design Code downgrade allowing "reds", which undermines design quality. Darlington Golf Club has confirmed it will not be relocating, it's land therefore should be removed from the housing allocation. If relocation remains referenced, the marker must be reinstated and placed away from BNG/NN land. If, Darlington Golf Club did decide to relocate, surely, Dinsdale Golf Course, now closed, represents the most suitable relocation option."	States that the Local Plan requires clarity on the boundaries of high value land. Additionally requests stronger evidence to justify the inclusion of the proposed employment land within the southern part of the Skerningham allocations. Notes that Barmpton Quarry landfill site is located within the allocation boundary. A comment is provided related to the introduction of a Building for a Healthy Life Assessment as part Policy DC1. Objects to the Skerningham Design Code SPD being relaxed to allow reds. The comment also requests that Darlington Golf Club be removed from the boundary of the Skerningham Allocation on the grounds that it is not relocating. If the club is relocating, requests the the indicative marker for a relocation is re-added to the Masterplan Framework associated with Policy H10	Local Plan viability work is currently being update and this will likely result in changes to valuation areas. Policy DC1 was modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more reds will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated. It was not intended that this requirement should impact upon the Skerningham or Burtree allocations which have their own design codes and was intended to raise design standards outside these areas. Skerningham is a large allocation, with c.50% not intended to be developed for housing. Applications within the vicinity of the former landfill site will need to take its presence into account as part of their proposals and suggest adequate mitigation measures as required. The referenced marker has been removed as it is unlikey the golf course could now re-locate to the previously suggested area, which forms part of a package of biodiversity net gain and neutrient neutrality measures being brought forward as part of application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming avaialble for development in the future - if (for example) the club were to cease operating.	Yes	Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints. References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.

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LPR055 & 56	Environment	Kathy Barley	Skerningham Woodland Action Group		Site	10			Object	The Local Plan must not be amended until the route of the Darlington Northern Link Road (DNLR) is unequivocally settled – or Skerningham Garden Village must be deleted from the draft. This is because, if the chosen route is one of those south of the woodland, Skerningham Garden Village (SGV) becomes unviable. The Tees Valley Mayor and Darlington Borough Council disagree publicly about the route of this key determinant of the entire planning policy and options both north and south of Skerningham Woods officially remain. The Skerningham Garden Village (SGV) masterplan, its design code and, indeed, the original bid for garden village status all depend on the bypass going north of the trees, well away from the residents of the new homes, their children and what limited wildlife remains nearby. (Most of the area's wildlife will die or move away because, as the SGV Biodiversity Net Gain report states, "none of the original habitats will be kept".) To qualify as a genuine garden community, Skerningham must be served by a quiet, crossable road, ideal for cyclists and walkers, with schools, jobs and main amenities within a ten-minute walk or ride. The term "distributor road", as the quiet road is called, has been deleted in several sections of the new draft Local Plan and replaced by references to the bypass – even though one option out of four remains to take that north of the woods, away from the houses. This seems to imply that a tacit decision has been made and, thus, there is a prima facie case of "predetermination". This is very likely to result in a judicial inquiry. Further evidence of probable predetermination exists in the recently released Options Assessment Report for the bypass, which shows the cost of the SGV road to have skyrocketed in two years. Skerningham Estates Ltd's June 2024 Viability Assessment showed the road plus bridge costing around £44m whereas the April 2026 OAR report estimates £140m. This is another clear indicator of a predetermination to build the bypass, rather than a quiet road, south of the trees. The viability of the site must be reassessed urgently. Like others, SWAG prefers a pre-existing, infinitely cheaper and infinitely less harmful alternative to the bypass – links from the A19 and A689. That would entail the SGV developers (or the taxpayer) funding the	The comment suggests the Local Plan should not be amended until the route of the Darlington Northern Link Road is finalised as the Skerningham Design Code, Masterplan, and the original bid for Garden Village status all depend on the DNLR avoiding the site. The respondent considers that Skerningham would not qualify as a genuine 'garden village' if the DNLR routes through the site. It is suggested that edits made to the plan, such as the removal of the term 'distributor road' from the Transport Chapter are in favour of the DNLR routing through Skerningham and are a case of pre-determination. It is also suggested that the cost of the road through Skerningham has increased significantly in recent years and that the viability of the site must be re-assessed. The respondent states that the Skerningham Woodland Action Group would prefer the proposed distributor road to any routing of the DNLR through Skerningham. Additionally, the comment suggests that the local plan as a whole distorts Darlington's future housing needs and that an aging population and declining birth rate instead require more sustainable smaller flats and bungalows. The comment then questions if there are the future jobs to justify the need for Skerningham and Darlington's other garden villages.	The National Planning Policy Framework states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years.While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not reliant on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable by the site promoters. References to, and triggers for, the delivery of the Local Distributor Road remain in Policy H10. Changes of terminolgy within the Transport Chapter relate to the local distributor road's role as one of several links roads brought forward by developments around Darlington creating an interconnected orbital route. The housing mix policies in the Local Plan make use of evidence from the Council's latest Strategic Housing Market Assessment and employment needs are also assessed as part of the update to the Plan.	Yes	Review references to 'link road' in the Transport Chapter to ensure function of the term is clear.
LPR055 & 56a	Housing	Kathy Barley	Skerningham Woodland Action Group		Site	10			Object	Objections to the draft Local Plan by Skerningham Woodland Action Group There is a valid question to be asked over the Local Plan describing the SGV as a "garden community" at all. SWAG contends that it seems just a giant housing estate, intermingled with existing suburbs, with few, if any, garden village characteristics: a bypass instead of a country lane; no schools acting as community hubs; no sign of jobs; no concrete announcements about a health centre; no "green buffer" between new houses and the existing suburbs; no help with public transport; no community trust ensuring equitable decisions on SGV land and amenities. These garden community essentials are clearly in danger of being shelved and the Local Plan should ensure that never happens, especially on projects which the council itself promotes. Especially when Homes England is providing a third of a million pounds to help the council cope with extra planning and to ensure garden community principles are followed in the Local Plan! Other issues relevant to SWAG's purposes include the following: The term "social rents" has vanished from the draft plan, replaced by "affordable rents (80 percent of market rate)", contrary to Government policy and NOT affordable to many. Also, SWAG believes that all social housing must be built alongside full-price homes and not scrapped as "unviable" in favour of payment in lieu for them to be built somewhere else just because developers claim they cannot achieve a 20 percent profit. If a builder's plan becomes "unviable" in their opinion, approval should be rescinded for the project in total. Land is often allocated to build local services which are then not delivered. The council must insist on enforcement mechanisms. The Local Plan must enforce thorough investigation of emissions from Barmpton's former landfill site and stipulate safety precautions and minimum distances of new homes. SWAG has obtained readings of higher methane levels at the site than those officially recorded. A radical change to Policy DC1, paragraph under (i), p.60 now says "reds" – meaning failures – ARE allowed in	Skerningham Woodland Action Group suggests that Skerningham should not be described as a 'garden village' or 'garden community' due to what they view as deficiencies with the proposals. They highlight the importance of ensuring new services and facilities are delivered within Skerningham as early as possible. SWAG asks that the Local Plan enforce investigation of emmisions from the former landfill site near Barmpton, within the Skerningham allocation and set out safety precautions and minimum distances. Draws attention to the wording of Policy DC1 regarding the use of Building for a Healthy Life, and how this would interact with the Skerningham Garden Village Design Code. Raises concerns that the term 'social rent' has been removed from the Local Plan - to be replaced with 'affordable rents' - and states that the Council investigates any claims by developers that provision of affordable housing has become unviable on a site.	Skerningham Garden Village was awarded Garden Community status by Homes England, and has generally been known as a garden village. Nevertheless, the Planning Policy Team will consider whether the terms 'Garden Village' or 'Garden Community' should be used in the contect of the Local Plan allocations. Barmpton Quarry Landfill will be considered as part of the decision making process. Applications within the vicinity of the former landfill site will need to take its presence into account as part of their proposals and suggest adequate mitigation measures as required. Policy DC1 was modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more reds would not be acceptable and would be refused planning permission unless significant overriding reasons can be demonstrated. It was not intended that this requirement should impact upon or override the Skerningham or Burtree allocations which have their own design codes and was instead intended to raise design standards outside these areas. Policy H10 works in conjuction with the agreed Masterplan for Skerningham and the Design Code to manage the development of the site. This has created a framework to encourage the early delivery of infrastructure and facilities. The term 'Social Rent' has not been removed from the Local Plan - changes have been made to Para. 6.6.1 of the Reg. 18 Plan to provide the term with its own bullet point seperate from 'Affordable Rent'.	Yes	Consider whether the phrase 'Garden Village' should be used in relation to the site allocations in the plan. Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints.
LPR058b	Housing	Colin Griffiths	Satnam Planning Services for Tiviot Way		Policy	10	H10. Skerningham		Unknown	The Skerningham Board members are meeting regularly to discuss and refine the infrastructure requirements for the Skerningham strategic allocation and following that, to prepare a model part 1 S106 Agreement. ii. It has become apparent in those meetings that the current triggers included in H10 (and unamended in this local plan review) require reconsideration in the light of the assessed costs of the infrastructure and the circumstances of how the infrastructure can be funded and constructed. iii. There is no evidence presented by the council to justify a 1,500 dwelling delivery trigger regarding the final local distributor road link through TWIL land. iv. Consequently as part of the plan review, the council should undertake a viability testing assessment of the required infrastructure for Skerningham Village, in line with the Viability PPG, to determine the exact number of houses that could sufficiently fund the completion of the distributor road, and the mechanism for the collection of funds from all developments within the Skerningham allocation. This will ensure the policy triggers are positively prepared, justified and robust. v. It is established in these Skerningham Board meetings that the only feasible way for the distributor road and railway bridge to be built is by the collection of funds on a roof tax basis on the occupation of houses constructed on the site, collected via S106 Agreement, working alongside those parts of the site that select to construct a part of the distributor road within their application site as part of their development scheme. These monies are then held by the council and the road and bridge, and indeed other infrastructure items, will be constructed once sufficient funds are collected. Thus, continuing to refer to arbitrary housing number triggers in policy H10 is neither sensible nor possible, as construction is governed by the cost of the infrastructure and the pace of development and housing occupations. vi. As such, the triggers within policy H10 should be reassessed and appropriate wording introduced by the council to reflect the situation emerging from the S106 meetings in the next few months up to Reg 19 publication. Savills set out in their representations at paras 3.12 – 3.16 the triggers TWIL consider to be	Satnam Planning Services represent Tiviot Way Investments, one of the three principle site promoters within the Skerningham. In their comment they challenge the continued use of the 1500 dwelling delivery trigger for the completion of the local distributor road that would link the A167 with the A1150. They request that the Council undertake a viability to determine the exact number of houses sufficient to fund the completion of the Distributor Road in oder to ensure the policy triggers are positively prepared, justified and robust.	The 1500 dwelling trigger has been carried forward from the existing plan and was originally based on highway requirements to protect the local network. The Council would be open to varying the trigger subject to appropraite evidence that doing so would not severely impact the highway network.	No	None
LPR069a	Housing	Jude Murray	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	Should the DNLR remain in the Local Plan then this could impact on both the Skerningham Masterplan and Design Code. These will therefore need to be re-visited before any planning applications are approved. This needs to be included in Policy H10. I object to the change of wording from 'local distributor road' to 'link road'. Points (f) and (g) still state the former whereas other references state the latter. In order to avoid any confusion with the DNLR this should stay as the 'local distributor road' and all other mentions realigned. There is a mismatch between H10 (g)(iii) and the Masterplan. Para (g)(iii) states that the delivery of the section of the road between Barmpton Lane and Bishopton Lane will be delivered prior to the occupation of the 450th dwelling. Technically this is Phase 2 of the Masterplan, however, the Masterplan states that this section of the road will be delivered in Phase 2 which is between the 450th and 600th dwelling. The Masterplan therefore needs to be revised to align with the Local Plan. During the previous Local Plan hearing the viability of Skerningham was called into question by the Planning Inspector. Costs have significantly risen since then and an urgent re-assessment of the viability of Skerningham needs to be undertaken to ensure it is still viable for delivery within the Local Plan timeframe. Greater clarity is needed as to the treatment of the old landfill site west of Barmpton Lane. Evidence shows that this is still producing gas and normally homes should not be built within 50m of such a site. Policy H10 should also include a requirement for detailed monitoring of the landfill site to ensure there is no danger to future residents. I understand that a planning application has already been received for the 22ha (net) of employment land allocated within Policy H10. The Local Plan should be well evidenced so that the need for this land as employment land is very clear.	Suggests changes related to the DNLR mean the Design Code and agreed Masterplan need to be reviewed - and that the Local Plan should be changed to require these reviews to happen before any planning applications are approved. Asks that all previous reference to the Skerningham Distributor Road that have been changed to 'link road' should be amemded. Mentions a misalignment between Policy H10 and the agreed Masterplan regarding the delivery of the first section of the Skerningham Distributor Road. Requests that the viaibility work related to Skerningham Garden Village be re-assessed to adjust for increased cost pressures. Asks that the Local Plan enforce investigation of emmisions from the former landfill site near Barmpton, within the Skerningham allocation. Comments that the Local Plan will need robust evidence for the designation of employment land as part of the Skerningham allocations.	While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not reliant on the DNLR. The Skerningham allocation and the associated infrastructure has also been assessed as viable by the site promoters as a whole. References to, and triggers for, the delivery of the Local Distributor Road also remain in Policy H10. The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fufill the principles of the garden communities programme and Tiviot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council intends to re-integrate the two allocations proposed in the Reg. 18 Plan to form one mixed use allocation - with the location of of the proposed emplyment area within the Tiviot Way site to be shown on the Masterplan Framework. The current Local Plan provides a range of between the occupation of the 300th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed. Barmpton Quarry Landfill will be considered as part of the decision making process.	Yes	Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.
LPR072	Housing	Trustees of Thoroton	Trustees of Thoroton and Croft	Kitty Campbell, Galbraith, Burn House, Burn Lane, Hexham NE46 3RU	Policy	10	H10 – Skerningham – Site Allocation (strategic)		Support	We support the general principle of Skerningham Garden Village. We are representing landowners who own land currently within the area designated as 'Indicative Strategic Green Infrastructure' on the proposed masterplan framework. We would suggest that there will need to be a future expansion requirement for the garden village and would like to put forward our land as being an option but do not wish for the land to be allocated solely as green infrastructure as this may prejudice future expansion opportunities for other uses. We appreciate that this will be longer term and wish to work collaboratively with the council on this. See submitted representation.	The repondant represents landowners who own land between Hutton Plantation, Skerningham Community Woods, and the River Skerne, to the west of Barmpton Village. The area is currently shown as Indicative Strategic Green Infrastructure within the Masterplan Framework. The comment suggests they support the principle of the Garden Village but that there may be further need to expand the garden village and that they would like this site to be considered. The comment objects to the area being shown as Strategic Green Infrastructure.	The land in question is currently shown as Strategic Green Infrastructure within the Masterplan Frameworks. It is unlikely to be considered suitable for residential development as it would be north of the ridgeline within the valley of the River Skerne. The Council has established design principles for Skerningham through the Design Code SPD, which focuses all development south of the proposed distributor road out of the valley of the Skerne, to leave this area available for leisure/ecology/etc. uses.	No	None

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LPR074b	Housing	Leanne Carroll	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	Policy H10 point g ii. says: "Prior to the completion of the development on the western part of the allocation (between the A167 and East Coast Mainline) the remaining section of the local distributor road to the East Coast Mainline shall be delivered." This conflicts with the Masterplan which states that in Phase 1 when the first 450 houses are to be delivered on the western part of the allocation (between the A167 and the East Coast Mainline) the section of the local distributor road between the A167 and East Coast Mainline (ECML) shall be delivered. Planning applications must adhere with the Masterplan and Local Plan, how is this possible when they plan for different things at different times? The Local Plan should be amended so that the connection to the ECML is delivered when the Masterplan says it will be. There should be no objections from the developers about this because the Masterplan was jointly created by Skerningham Estates and Banks Property. Screenshots from the agreed Masterplan below.	Mentions a possible misalignment between Policy H10 and the agreed Masterplan regarding the delivery of the first section of the Skerningham Distributor Road.	The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed.	No	None
LPR074c	Housing	Leanne Carroll	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		No answer provided	Screenshots provided, believed to be from the Masterplan. The Masterplan agreed by Cabinet also contradicts with the Local Plan in so far as the Local Plan still states that the delivery of the road between Barmpton Lane and Bishopton Lane will be built prior to the occupation of the 450th dwelling. The Masterplan however states that this will be delivered in Phase 2 which is anywhere between the 450th and 600th dwelling. ● The recently released Options Assessment Report (OAR) for the DNLR throws into doubt the viability of Skerningham with the cost of the road alone having skyrocketed in two years. Skerningham Estates Ltd's June 2024 Viability Assessment showed the road plus bridge costing in the region of £44m, whereas the April 2026 OAR report states £140m. Is Skerningham actually deliverable now? The viability of the site must be reassessed urgently now there is more up-to-date evidence available. A Local Plan review must take such a significant cost increase into account because it directly impacts the viability and deliverability of the Local Plan, which are legal requirements for a plan to be found "sound". ● During a Local Plan review, the Council must provide an evidence base for a site near a landfill like Skerningham. I have seen the Phase 1 Desktop Study July 2024 Part 1 that the developers have submitted as part of their planning applications at Skerningham but it cites old and out-of-date figures from 2015 when more recent monitoring data is available from the Environment Agency (EA). The EA has monitoring data from as recently as 2025 and their figures for methane and carbon dioxide levels within internal monitoring wells in 2015 far exceed those written in the desktop study. Is the Local Plan underpinned by relevant and up-to-date evidence? I have seen data from 2025. If you haven't used the latest monitoring data, you cannot prove the site is safe or economically viable for remediation. Policy H10 should include information regarding a buffer zone. Former landfills are "living" environments. Using old data is legally and technically risky. Screenshots from the Phase 1 Desktop Study July 2024 Part 1 and the EIR response from the EA below (see submitted attachment)	Comment suggest that the agreed Skerningham Masterplan contradicts the Local Plan, as the Local Plan states that the local distributor road between Bishopton Lane and Barmpton Lane will be constructed prior to the occupation of the 450th dwelling, whereas the Masterplan states this section of road will be delivered as part of Phase 2 – between the 450th and 600th dwelling. The comment also raises an issue of cost/viability disparities between the site developers viability work for the Local Distributor Road and the TVCAs Options Appraisal Report for the DNLR and uses this as a basis to suggest Skerningham may be unviable. The comment also raises the issue of Barmpton Quarry Landfill being located within the allocation boundary and references information submitted as part of application 24/00772/FULE.	The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed. The Darlington Northern Link Road and the Skerningham Distributor Road are currently different schemes with different requirements. Cost estimates cannot be easily compared between the two. The Council has examined the costs associated with key infrastructure provided by Skerningham Estates and is satisfied they are robust and that the scheme remains viable. Barmpton Quarry Landfill will be considered as part of the decision making process. Applications within the vicinity of the former landfill site will need to take its presence into account as part of their proposals and suggest adequate mitigation measures as required.	No	None
LPR074d	Housing	Leanne Carroll	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	Darlington Golf Club's land should be removed from the Local Plan, Policy H10. If not, the Pink Star marker that has disappeared must be included on the alternative Masterplan (Figure 6.2) on land south of the woodland and not occupying land allocated for Biodiversity Net Gain or Nutrient Neutrality (which must be retained for 30 years) as these are not compatible with golf course use. Where would the Golf Club relocate to? If there is nowhere for it to go, the Golf Club land should be removed from the Skerningham allocation.	Requests that Darlington Golf Club be removed from the boundary of the Skerningham Allocation on the grounds that it is not relocating. If the club is relocating, requests the the indicative marker for a relocation is re-added to the Masterplan Framework associated with Policy H10.	The 'pink star' has been removed as it is unlikey the golf course could now re-locate to the previously suggested area, which forms part of a package of biodiversity net gain and neutrrient neutrality measures being brought forward as part of application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming available for development in the future, if for any reason the club were to cease operations.It is not anticpated that the site developers will make any further offers to allow the Golf Club to relocated to another site.	Yes	References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.
LPR074e	Housing	Leanne Carroll	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	Part of the Skerningham site was defined as "high value" last time around. The Local Plan must identify where this land is, how many homes it must deliver and how many affordable homes it would trigger.	Comment notes that part of the Skerningham Allocation was previously defined as 'high value'.	It is believed this comment relates to the previous Local Plan Viability Assessment. Local Plan viability work is currently being updated and this will likely result in changes to valuation areas.	Yes	Updating of valuation areas will be completed following conclusion of viability work.
LPR074g	Housing	Leanne Carroll	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	Any road through Skerningham should be consistently referred to throughout the Local Plan as "local distributor road" as in Policy H10. Use of the word "link" should be removed so it is clear if the road being referred to is the actual local distributor road through Skerningham or the Darlington Northern Link Road (DNLR). The local distributor road and DNLR are different roads we have always been told. If they are now not different roads, this should be made clear in the Local Plan.	Raises an issue with general terms such as 'link road' being used in the plan. Results in it being unclear whither the Darlington Northern Relief Road or the Skerningham Distributor Road are being refered to.	Changes of terminolgy within the Transport Chapter relate to the local distributor road's role as one of several links roads brought forward by developments around Darlington creating an interconnected orbital route.	Yes	Review references to 'link road' in the Transport Chapter to ensure function of the term is clear.
LPR075	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	2. Viability concerns and public value: Recent information indicates that the cost of the DNLR has increased dramatically. This raises serious questions about whether the Skerningham development remains viable or deliverable in its current form. If key infrastructure is uncertain or unaffordable, the allocation should be reconsidered. Development should not proceed where it risks compromising essential infrastructure, environmental protections, or community benefits.	Requests that the viability work related to Skerningham Garden Village be re-assessed to adjust for increased cost pressures. If unviable, the allocation should be reconsidered.	The Skerningham allocation and the associated infrastructure has been assessed as viable by the site promoters.	No	None
LPR075a	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	3. Protection of Skerningham Woods and biodiversity: Skerningham Woods is a valued natural asset providing important habitats for wildlife and a significant recreational resource for residents. Development proposals must prioritise the long-term protection of this woodland and surrounding green spaces. Land identified for Biodiversity Net Gain and nutrient neutrality must remain safeguarded and not be repurposed for other uses. Alternative locations for development should be explored, particularly previously developed (brownfield) land or sites with lower ecological value.	Comment states that Skerningham Woods is a valuable natural asset and significant recreation resource. Alternative sites for development should be explored, and land identified for biodiversity net gain and neutrient neutrality must be safegaurded.	Protections for land identified for Biodiversity Net Gain and Neutrient Neutrality form part of the decision making process. The sites assessed by the Council during the development of the Local Plan will be set out in the sustainability appraisal.	No	None
LPR075b	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	4. Inconsistencies in the masterplan and delivery phasing: There appear to be contradictions between the approved Masterplan and the Draft Local Plan, particularly regarding when key infrastructure such as the Barmpton Lane to Bishopton Lane link will be delivered. This lack of clarity creates uncertainty for residents and raises concerns that housing could be delivered ahead of necessary infrastructure. The plan should be revised to ensure infrastructure is delivered first, not retrofitted later.	Mentions a misalignment between Policy H10 and the agreed Masterplan regarding the delivery of the first section of the Skerningham Distributor Road. Suggests the Local Plan should be revised to ensure prior delivery of infrastructure.	The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed.	No	None
LPR075c	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	5. Design Code integrity must be upheld: The proposed change to allow developments that receive a "red" rating under the Design Code is deeply concerning. The purpose of the red/amber/green system is to prevent inappropriate or harmful development. Allowing schemes that fail these standards undermines the entire framework. Any development that scores "red" should be refused.	Draws attention to the wording of Policy DC1 regarding the use of Building for a Healthy Life, and how this would interact with the Skerningham Garden Village Design Code.	Policy DC1 has been modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more reds will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated. It is not intended that this requirement should impact upon the Skerningham or Burtree allocations which have their own design codes. It is intended to raise design standards outside these areas. However, the resource implications of this measure have also been highlighted in responses to DC1. The changes will either be modified to clearly exclude the garden villages or will be removed entirely due to resource constraints.	Yes	Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints.
LPR075f	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	8. Previous consultation and community concerns: Residents have consistently raised concerns about development at Skerningham, particularly in relation to environmental impact, infrastructure capacity, and loss of green space. It is important that these views are properly reflected and not overridden without clear justification. The Local Plan should demonstrate how earlier feedback has influenced current proposals.	Notes that residents have regulary raised concerns about the development of Skerningham - especially related to environmental impact, infrastructure capacity and loss of green space. The Local Plan should be modified to demonstrate how earlier feedback has influenced the current version of Policy H10.	Residents concerns are acknowledged. Skerningham has been through multiple rounds of public consultation including for the previous Local Plan, the Design Code, and the Masterplan. Changes made due to received comments are set out in the relevant consultation statements.	No	None
LPR075g	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	9. Consideration of alternative approaches Given the significant concerns outlined above, I urge the Council to: - Reassess whether Skerningham remains a suitable and sustainable allocation - Prioritise brownfield and lower-impact sites for housing delivery - Ensure infrastructure is fully planned, funded, and deliverable before development - Strengthen protections for existing communities and natural assets	Comment urges the Council to re-assess Skerningham to check it is still a suitable and sustainable allocation and to consider prioritising brownfield and lower impact sites for housing delivery. Considers that infrastructure must be delivered prior to development.	The sites assessed by the Council during the development of the Local Plan will be set out in the sustainability appraisal. The agreed Masterplan sets out phasing of infrastructure at Skerningham based off the triggers provided within Policy H10.	No	None
LPR075h	Housing	Lisa Locke	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	1. Prematurity and dependency on the Northern Link Road: The Local Plan no longer clearly states that development at Skerningham is independent of the Darlington Northern Link Road (DNLR). In reality, the scale and layout of the proposed development are intrinsically linked to this infrastructure. It is not appropriate for the Local Plan to progress, or for planning permissions to be granted, until the route, funding, and deliverability of the DNLR are confirmed. The uncertainty undermines the soundness of the plan and creates significant risk for residents and the environment.	Comments that it is no longer clear within the Local Plan that the development of Skerningham is independent of the delivery of the Darlington Northern Relief Road (DNLR) due to the removal of the reference at Para. 10.5.9. Considers the Local Plan should not progress until the route, funding and delivery of the DNLR is confirmed.	The National Planning Policy Framework states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years. While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not relient on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable as a whole by the site promoters. References to, and triggers for, the delivery of the Local Distributor Road remain in Policy H10.	No	None

LPR081	Housing	J Murray	Secretary - Whinfield Residents Association inc Friends of Beech Wood		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Neutral	As per the above, should the references to the DNLR remain in the Local Plan then these will potentially impact on the agreed Design Code and Masterplan which will need to be re-visited in the light of the route chosen for the DNLR. This should be included as a point in Policy H10. Policy H10(g) refers to the 'local distributor road' whereas other wording in the local Plan for the same road has been referred to as the 'local link road'. The wording in relation to this road should be consistent. We would suggest that the wording remains as the 'local distributor road' so as not to cause any confusion with the Darlington Northern Link Road. Policy H10(g)(ii) states that "Prior to the completion of the development on the western part of the allocation (between the A167 and the East Coast Mainline) the remaining section of the local distributor road to the East Coast Mainline shall be completed." This conflicts with the Masterplan which says that in Phase 1 when 450 houses are delivered on the western part of the allocation (between the A167 and the East Coast Mainline) "the section of the Local Distributor Road between the A167 and East Coast Mainline shall be delivered". The viability assessment for Skerningham Garden Village needs to be urgently re-visited as costs have risen significantly since the first Local Plan and the viability needs to be re-considered. In the Local Plan 2016-2036 public hearings it was determined that part of the Skerningham site would be 'high value'. Under the proposed review this would therefore trigger a higher % of affordable housing. Will this then affect the viability of the site. A viability review needs to be undertaken. Policy H10 also states that it will deliver approximately 22ha (net) of employment space. to the east of the River Skerne within site SOS. Evidence of need for this employment land needs to be provided especially as a planning application for almost 800 homes has been received for this land.	Comment suggests that the Design Code SPD and the agreed Masterplan would need to be reviewed were the DNLR to route through the Skerningham allocation. Objects to changes to the Transport Section to use term 'link road' while Policy H10 continues to use the term 'Local Distributor Road'. Comment suggest that the agreed Skerningham Masterplan contradicts the Local Plan, as the Local Plan states that the local distributor road between Bishopton Lane and Barmpton Lane will be constructed prior to the occupation of the 450th dwelling, whereas the Masterplan states this section of road will be delivered as part of Phase 2 – between the 450th and 600th dwelling. Additionally, suggests that the viability of Skerningham needs to be re-evaluated on the basis that costs have risen significantly since the Local Plan was adopted. The comment also notes that part of the Skerningham Allocation was previously defined as 'high value'. Notes that evidence needs to be provided for the creation of the new employment allocation near Great Burdon due to the residential application recieved in this area from Tiviot Way Investments.	Consideration will be given to updating the Masterplan and Design Code as and when necessary should the route of the DNLR be confirmed. Changes of terminolgy within the Transport Chapter relate to the local distributor road's role as one of several links roads brought forward by developments around Darlington creating an interconnected orbital route. The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed. The Council has examined the costs associated with key infrastructure for the distributor road provided by Skerningham Estates and is satisfied they are robust and that Skerningham remains viable as a whole. The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fulfil the principles of the garden communities programme and Tiviot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council intends to re-integrate the two allocations proposed in the Reg. 18 Plan to form one mixed use allocation - with the location of	Yes	Review references to 'link road' in the Transport Chapter to ensure function of the term is clear. Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.
LPR082	Housing	David Clark	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	DNLR wording amended in revised local plan - see attachment	The respondent objects to the wording changes in the Transport Section regarding the DNLR. States a bypass should not be routed through a housing development - this concept does not align with the Healthy New Town concepts set out in the Local Plan. Additionally suggests the wording changes are a case of predetermining the upcoming public consultation on the DNLR. Additionally objects to the removal of the 'pink star' marker from the Masterplan Framework that showed an indicative location for the relocation of the Golf Club. Objects to the introduction of Building for a Healthy Life as part of Policy DC1 - and draws attention to how it could conflict with requirments in the Council's Design Code for Skerningham.	Development of the Darlington Northern Link Road is being led by the TVCA. The wording in Para. 10.5.9 has been changed as the route of the DNLR has yet to be decided. Other changes of terminolgy within the Transport Chapter relate to the local distributor road's role as one of several links roads brought forward by developments around Darlington creating an interconnected orbital route. The 'pink star' has been removed as it is unlikey the golf course could now re-locate to the previously suggested area, which forms part of a package of biodiversity net gain and neutrrient neutrality measures being brought forward as part of application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming avaialble for development in the future, if for any reason the club were to cease operations.It is not anticipated that the site developers will make any further offers to allow the Golf Club to relocated to another site. Policy DC1 has been modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more reds will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated. It is not intended that this requirement	Yes	Review references to 'link road' in the Transport Chapter to ensure function of the term is clear. References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skernigham Community Woods.
LPR084e	Housing	Tony Gillam	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	Skerningham GV and Darlington Northern Link Road (DNLR) The above are intrinsically linked. If the DNLR goes through Skerningham then the whole Garden Village concept goes! Instead the development becomes a poorly regulated urban sprawl. The proposed approach to the DNLR remains unsound. Routing a bypass through new housing is incompatible with resident health and wellbeing and contradicts the Skerningham Garden Village (GV) Design Code. The Plan must retain the statement that Skerningham GV cannot proceed until the DNLR route is fixed. The original safeguarded route must remain in place until a final decision is made. With costs rising from £40m to £140m, a full viability reassessment is essential. Land beyond the DNLR must remain protected for 30 year nutrient neutrality (NN) and Biodiversity Net Gain (BNG) commitments. I object to the wording change from "local distributor road" to "link road", as Policy H10 continues to rely on the former. The DNLR appraisal also fails to consider the cheaper, lower impact A19/A689 HGV alternative. The Plan requires clarity on the boundaries of "high value" land and the affordable housing triggers associated with it. Stronger evidence is needed to justify employment land near Great Burdon. The Barmpton landfill site requires clear safety standards, minimum distances, and investigative work. We strongly object to the Design Code downgrade allowing "reds", which undermines design quality. Darlington Golf Club has confirmed it will not relocate; its land should therefore be removed from the housing allocation. If relocation remains referenced, the marker must be reinstated and placed away from BNG/NN land. Dinsdale Golf Course, now closed, represents the most suitable relocation option.	Comment suggests that the Darlington Northern Link Road and the development of the Skerningham allocation are intrinsically linked, and that routing the DNLR through Skerningham would damage the garden village concept. The respondant suggest the Local Plan should not proceed until the DNLR route is fixed. Objects to changes to the Transport Section to use term 'link road' while Policy H10 continues to use the term 'Local Distributor Road'. Additionally suggests that the orginal safeguarded route for the DNLR should remain in the plan until the route is fixed. The comment also notes that part of the Skerningham Allocation was previously defined as 'high value'. The comment also requests that Darlington Golf Club be removed from the boundary of the Skerningham Allocation on the grounds that it is not relocating. If the club is relocating, requests that the indicative marker for a relocation is reinstated on the Masterplan Framework associated with Policy H10.	The National Planning Policy Framework states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years. The current Local Plan does not safeguard a route for the DNLR, and the Council is not in a position to safeguard a route as of this time through the Local Plan. The Council has examined the costs associated with key infrastructure for the distributor road provided by Skerningham Estates and is satisfied they are robust and that Skerningham remains viable as a whole. Regrading the 'high value land', Local Plan viability work is currently being updated and this will likely result in changes to valuation areas. The 'pink star' marker has been removed as it is unlikely the golf course could now re locate to the previously suggested area, which now forms part of a package of biodiversity net gain and neutrient neutrality measures being brought forward as part of application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming avaialble for development in the future, if for any reason the club were to cease operations.It is not anticpated that the site developers will make any further offers to allow the Golf Club to relocate to another site.	Yes	Review references to 'link road' in the Transport Chapter to ensure function of the term is clear. References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skernigham Community Woods.
LPR086a	Housing	Roger Fitzpatrick-Co	Resident		Policy	10	H10 – Skerningham – Site Allocation (strategic)		Object	Should the DNLR remain in the Local Plan then this could impact on both the Skerningham Masterplan and Design Code. These will therefore need to be re-visited before any planning applications are approved. This needs to be included in Policy H10. Policy H10, points f) and g) still talk about the local distributor road network (where other wording has been changed to "local link road") - the wording used should be consistent, and I believe the words "local distributor road" should be used in all cases, NOT "link road" (as we are told the route of the DNLR has not yet been decided and this would pre-determine it). This would also avoid any confusion about what is the distributor road and what is the DNLR. There is a mismatch between H10 (g)(iii) and the Masterplan. Para (g)(iii) states that the delivery of the section of the road between Barmpton Lane and Bishopton Lane will be delivered prior to the occupation of the 450th dwelling. Technically this is Phase 1 of the Masterplan, however, the Masterplan states that this section of the road will be delivered in Phase 2 which is between the 450th and 600th dwelling. The Masterplan therefore needs to be revised to align with the Local Plan. Since the last Local Plan costs have increased significantly and therefore an urgent re-assessment of the viability of the Skerningham Garden Village development needs to be undertaken to ensure that it is still viable. I understand that a planning application has already been received for the 22ha (net) of employment land allocated within Policy H10. The Local Plan should be well evidenced so that the need for this land as employment land is very clear.	Comment states that the development of the Darlington Northern Link Road by the Tees Valley Combined Authority could impact the both the Skerningham Masterplan and the Design Code. Inconsistant wording is noted between Policy H10 and policies with the Transport Section regarding the Local Distributor Road and the Darlington Northern Relief Road. Suggest there is a mismatch between the requirements for the delivery of the first section of the Local Distributor Road between the agreed Masterplan and Policy H10. Requests a reassessment of the viability of Skerningham Garden Village be undertaken to clarify is the allocation is still viable Notes that a planning application has been recieved by the Council for housing by Tiviot Way Investment for the area that was proposed to be re-allocated as employment land in the Reg 18 Draft Local Plan.	The Council has previously stated its intention that the Masterplan and Design Code should be regularly reviewed and were the Darlington Northern Relief Raod to be confirmed as passing through Skerningham then such reviews may be necessary. At this time though, the TVCA is consulting on route options and no final route has been decided. As such, the Council's intention is that development at Skerningham should proceed on the basis the DNLR will not pass through the allocation, until further information is known. Changes of terminolgy within the Transport Chapter relate to the local distributor road's role as one of several links roads brought forward by developments around Darlington creating an interconnected orbital route. The Council has examined the costs associated with key infrastructure for the distributor road provided by Skerningham Estates and is satisfied they are robust and that Skerningham remains viable as a whole. The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed. The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment	Yes	Review references to 'link road' in the Transport Chapter to ensure function of the term is clear. References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skernigham Community Woods. Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.
LPR090c	Housing	Colin Griffiths	Satnam Group		Policy	10	Policy H 10 Skerningham – Site Allocation (Strategic Policy)			3. H10 Triggers. i. The Skerningham Board members are meeting regularly to discuss and refine the infrastructure requirements for the Skerningham strategic allocation and following that, to prepare a model part 1 S106 Agreement. ii. It has become apparent in those meetings that the current triggers included in H10 (and unamended in this local plan review) require reconsideration in the light of the assessed costs of the infrastructure and the circumstances of how the infrastructure can be funded and constructed. iii. There is no evidence presented by the council to justify a 1,500 dwelling delivery trigger regarding the final local distributor road link through TWIL land. iv. Consequently as part of the plan review, the council should undertake a viability testing assessment of the required infrastructure for Skerningham Village, in line with the Viability PPG, to determine the exact number of houses that could sufficiently fund the completion of the distributor road, and the mechanism for the collection of funds from all developments within the Skerningham allocation. This will ensure the policy triggers are positively prepared, justified and robust. v. It is established in these Skerningham Board meetings that the only feasible way for the distributor road and railway bridge to be built is by the collection of funds on a roof tax basis on the occupation of houses constructed on the site, collected via S106 Agreement, working alongside those parts of the site that select to construct a part of the distributor road within their application site as part of their development scheme. These monies are then held by the council and the road and bridge, and indeed other infrastructure items, will be constructed once sufficient funds are collected. Thus, continuing to refer to arbitrary housing number triggers in policy H10 is neither sensible nor possible, as construction is governed by the cost of the infrastructure and the pace of development and housing occupations. vi.	This comment is from C. Griffiths (Satnam Group) who represents Tiviot Way Investments, one of the three principal site promotors within the Skerningham allocation. The comment states the 1500 occupation trigger for the delivery of the completed Distributor Road needs to be reconsidered in light of the assessed costs of the infrastructure. It is suggested the Council should undertake a viability testing assessment of the required infrastructure and that the housing number triggers in Policy H10 should be removed.	The triggers for the delivery of the local distributor road were included in the plan due to highway considerations. The Council is prepared to consider altering the trigger points subject to receiving and reviewing appropporaite highway modelling so the effect of delaying the Local Distributor Road can be fully understood.	Yes	Consider adjusting trigger points when further highway modelling is received.

LPR091	Housing	David Walton	Resident		Site	10			Neutral	2. There must be a reassessment of whether Skerningham is still viable. The Options Assessment Report for the DNLR released in April 2026 shows that the cost of the road/bridge alone has shot up from approximately £44m to a staggering £140m and will continue to rise. These monies could be fully utilised elsewhere!	The comment requests a reassessment of whether the development of Skerningham is still viable - reference is made to recent TVCA reports explroing the development of the Darlington Northern Link Road.	While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not relient on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable by the site promoters and the cost of essential infrastructure verified by the Council. References to, and triggers for, the delivery of the Local Distributor Road remain in Policy H10.	No	None
LPR091a	Housing	David Walton	Resident		Site	10			Neutral	3. The pink star marker has been erased from the alternative Masterplan (Figure 6.2) as for if the Golf Club should ever relocate. This pink star must be included to demonstrate that the site is capable of accommodating a new course on land south of the woodland and not on land for Biodiversity Net Gain or nutrient neutrality (which must be retained for 30 years). If there is nowhere for it to go, the Golf Club land should be removed from the Skerningham allocation. Please bear in mind the golf course has been designed by Dr Alister McKenzie a designer of a number of the worlds most notable golf courses. The master Plan agreed by the cabinet contradicts the Draft Local Plan with regards the road between Barmpton Lane and Bishopton Lane.	Requests that Darlington Golf Club be removed from the boundary of the Skerningham Allocation on the grounds that it is not relocating. If the club is relocating, requests the the indicative marker for a relocation is re-added to the Masterplan Framework associated with Policy H10. The comment also notes a mismatch between the requirements for the delivery of the first section of the Local Distributor Road between the agreed Masterplan and Policy H10.	The 'pink star' indicative marker has been removed as it is unlikey the golf course could now re-locate to the previously suggested area, which forms part of a package of biodiversity net gain and neutrient neutrality measures being brought forward as part of application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming avaialble for development in the future, if for any reason the club were to cease operations.It is not anticpated that the site developers will make any further offers to allow the Golf Club to relocated to another site. The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed.	Yes	References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.
LPR091b	Housing	David Walton	Resident		Site	10			Neutral	4. Policy DC1 i is proposing that major new residential development schemes could now receive planning permission even if they score a red. This is unacceptable and doesn't align with the Skerningham Design Code. If a scheme scores a red, it should be refused. The point of a Design Code rating is to Stop inappropriate development, are you now saying this is not the case !	Comment observes that changes to Policy DC1 are currently unclear as to how they relate to the Garden Village Design Codes. The passing criteria between the documents are different.	Policy DC1 has been modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated. It is not intended that this requirement should impact upon the Skerningham or Burtree allocations which have their own design codes. It is intended to raise design standards outside these areas	Yes	Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints.
LPR091c	Housing	David Walton	Resident		Site	10			Neutral	5. Affordable housing is it Social or Affordable, as Affordable contradicts Government Policy to offer more social rents. Or is this the new local policy in a nutshell.	Questions whether Policy H10 refers to social or affordable housing.	The Local Plan sets out a breakdown of affordale and social rents - see comments on Policy H5. Policy H10 should not be read in isolation.	No	None
LPR091d	Housing	David Walton	Resident		Site	10			Neutral	6. Assessments on viability have lead to a 20% Profit margin being proposed this is too high and must be reduced by the Government. Visibility of essential affordable housing must be retained in the Plan. Developments which don't meet needs should not be built. The Skerningham Garden Village Development needs to be revisited as in the previous Local Plan it was questionable!	Comment raises concerns regarding the 20% profit margin used during viability calculations as being too high and opinons that developments that don't meet affordable housing targets should not be constructed. Additionally, states that the allocation of Skerningham Garden Village in the Local Plan should be re-visited.	The Council cannot influence Government policy as part of this consultation. The allocation of Skerningham was approved by the Palnning Inspector as part of the examination of the adopted Local Plan.	No	None
LPR091e	Housing	David Walton	Resident		Site	10			Neutral	1. Is the Draft Local Plan, and specifically Skerningham, wholly reliant on the delivery of the Darlington Northern Link Road (DNLR)? as the sentence about the Local Plan not being reliant on the delivery of the DNLR has been removed. The DNLR impacts the Skerningham Design Code and Masterplan and its route must be decided and confirmed prior to the Local Plan review being finalised or any planning applications being determined as they will be impacted. As the route impacts on all facets of the country side, so must be set prior to any permits being granted. The development must be acknowledged by the TVCA.	Comment questions whether the delivery of Skerningham Garden Village is wholly relient on the DNLR. Respondent suggests that the DNLR should be confirmed before the Local Plan Review is finalised.	While options continue to be considered for the DNLR by the TVCA, Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not relient on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable by the site promoters as a whole and the cost of essential infrastructure verified by the Council. References to, and triggers for, the delivery of the Local Distributor Road remain in Policy H10.	No	None
LPR093	Housing	Emma Nimmo	Resident		Site	10			Neutral	There must be a reassessment of whether Skerningham is still viable. Costs have gone up from 44m to 140m for the road/bridge alone, which does not include other costs for the development.	The comment requests a reassessment of whether the development of Skerningham is still viable.	Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not relient on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable as a whole by the site promoters and the cost of essential infrastructure has been verified by the Council.	No	None
LPR093a	Housing	Emma Nimmo	Resident		Site	10			Neutral	Policy DC1 is proposing that new residential schemes could receive planning permission even if they score red. This does not align with the Skerningham Design Code. If it scores red then planning should be refused.	Comment suggests that changes to Policy DC1 do not align with the Garden Village Design Codes. The passing criteria between the documents are different.	Policy DC1 was modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red would not be acceptable and would be refused planning permission unless significant overriding reasons can be demonstrated. It was not intended that this requirement should impact upon the Skerningham or Burtree allocations which have their own design codes - it was intended to raise design standards outside these areas. Comments on DC1 have also made clear the resource implications of introducing this requirement. The Policy will need to be reworded to make this clear or the new requirment will need to be removed due to the rersource implications.	Yes	Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints.
LPR093b	Housing	Emma Nimmo	Resident		Site	10			Neutral	The Golf club is not now included on the masterplan, it must be included so does not impact on land allocated for nutrient neutrality/biodiversity net gain. If not included then must be removed from the allocation for Skerningham altogether and not added as an afterthought. Golf courses do not mean green spaces for all and have a negative impact on biodiversity.	Comment notes that a potential reolocation for Darlington Golf Club is not now shown in the Masterplan Framework and therefore requests the course be removed from the Skerningham Allocation on the grounds that it is not relocating. Notes that golf courses can be private spaces and can have a negative impact on biodiversity.	The marker showing a relocation site has been removed as it is unlikey the golf course could now re-locate to the previously sugested area - which forms part of a package of biodiversity net gain and neutrrient neutrality measures being brought forward in application 24/00772/FULE. The course has been retained within the allocation boundary to cover the possibility of this land becoming avaialble for development in the future, if for any reason the club were to cease operations.It is not anticpated that the site developers will make any further offers to allow the Golf Club to relocated to another site.	Yes	References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.
LPR093c	Housing	Emma Nimmo	Resident		Site	10			Neutral	The wording has been changed to affordable housing rather than social housing. This is in direct contradiction of the government policy for councils to offer more social housing. The wording should be reversed to prioritise social housing, and developments which do not meet our needs should not be built. The viability of the Skerningham Garden Village development must be revisited.	Comment suggests that wording in the Plan has been altered to use affordable housing rather than social housing. Additionally, suggests viability of Skerningham Garden Village should be revisited.	The term 'Social Rent' has not been removed from the Local Plan - changes have been made to Para. 6.6.1 of the Reg. 18 Plan to provide the term with its own bullet point seperate from 'Affordable Rent'.The existing reference to affordable housing in Policy H10 should be read with refrence to Policy H5. Skerningham Garden Village is being progressed under the assumption it will have to provide all the infrastructure necessary for the development itself. Its delivery is not relient on the DNLR. The Skerningham allocation and the associated infrastructure has been assessed as viable as a whole by the site promoters and the cost of essential infrastructure has been verified by the Council.	No	None
LPR093d	Housing	Emma Nimmo	Resident		Site	10			Neutral	The delivery of the Darlington Northern Link Road impacts the code and masterplan and the route must be decided before any planning applications are determined. The removal of the statement that the development can be delivered irrespective of the link road should be reversed.	Suggests that the development of the Darlington Northern Link Road will impact upon the Skerningham GV Design Code and the agreed Masterplan. Suggests that the removal of a statement that the development can be deliverred irrespective of the link road should be reversed.	Development of the Darlington Northern Link Road is being led by the TVCA. Changes of terminolgy within the Transport Chapter relate to the local distributor road's role as one of several links roads brought forward by developments around Darlington creating an interconnected orbital route.	No	None
LPR102f	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy	10	H10- Skerningham (strategic allocation)		Object	The wording of the Skerningham site allocation policy has been amended to include an additional criterion (h) that requires the allocation to "Deliver approximately 22ha (net) of employment space to the east of the River Skerne within Site SOS". We would add that the draft text contained in the Local Plan Review is not clear as to how this impacts on the overall housing provision. However, it is noted that the supporting text to policy H10 in the current Local Plan states, "6.10.9The site promoters have indicated that the site has the potential to provide 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 borough over the Plan period on existing employment sites and 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." This would indicate that the change to the policy means the allocation makes an additional contribution to the overall amount of employment land being allocated.	The comment notes that Policy H10 has been amended to include an additional criterion (h) that requires the allocation to 'Deliver approximately 22ha (net) of employment space to the east of the River Skerne within Site SOS'. It is suggested that it is not clear how this impacts overall housing provision.	The Council has held discussions with Tivlot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fufill the principles of the garden communities programme and Tivlot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council intends to re-integrate the two allocations proposed in the Reg. 18 Plan to form one mixed use allocation - with the location of of the proposed emplyment area within the Tivlot Way site to be shown on the Masterplan Framework.	Yes	Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.

LPR106	Housing	Andrew Keir	Councillor/Resident		Site	10			Object	We need the section of the 'relief/distribution road' from Skerningham village to the A66 roundabout to be completed earlier than the 450th house being built NOT delivered during Phase 2 of the development which means between 450th and 600th dwelling. The plan should be changes to ensure that this section of the relief road is essential as early as possible to ensure that traffic flows are maintained in the northern area of Darlington without gridlock. This would also reduce the level of traffic in Barmpton Lane and Whinbush Way, maintaining the amenity of the current residents of these two areas.	The comment notes a mismatch between the requirements for the delivery of the first section of the Local Distributor Road between the agreed Masterplan and Policy H10.	The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls bellow the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed.	No	None
LPR108c	Housing	Chris smith	Skerningham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1RF 0191 2615685	Policy	10	H10 – Skerningham – Site Allocation (strategic)		Support	In respect of Policy H10 and the supporting text, our client recognises and supports the Council's approach to increase the number of dwellings to be delivered at Skerningham Garden Village, from 1,650 to 1,950. This in part reflects a change to the plan period from 2036 to 2042, albeit there is a reference to 2036 that remains in the third line of Policy H10. In relation to referencing the Skerningham site, there is currently a mix of "Skerningham" and "Skerningham Garden Village". The Policy title is also "Skerningham – Site Allocation". Our client would recommend that a similar approach to Policy H11 (Burtree Garden Village) is adopted for Policy H10 whereby the site is consistently referred to as Skerningham Garden Village. This reinforces that the site is a Garden Village and is endorsed by the Government as such. There is a degree of inconsistency within the Local Plan with regards to the references to Policy H10. There are references to "H10" and "H 10", so it would be helpful for one of these to be applied for consistency to assist with text searches. The text in paragraphs three and four of the policy have been amended to reflect the progress that has been made since the adoption of the Local Plan with regards to the Design Code and Comprehensive Masterplan. Our client supports the recognition of this. Policy H10 has also been amended to allocate approximately 22 hectares of the Skerningham site for employment space (ref. 505). This is referenced in the first paragraph and criteria h. Criteria h makes clear that the employment space is identified on land to the east of the River Skerne, and within Site 505 – which is also included separately within the list of Employment Allocations in Policy E2. As per our client's response to Policy E2, there should be more clarity in the Site Name in Policy E2 for ref. 505, to make absolutely clear that employment area is to be located on land north of the A1150 and east of the River Skerne. The proposed change in the Local Plan Review responds directly to the provisions in the adopted Local Plan. Paragraph 6.10.9 in the adopted Local Plan is explicit that the potential need to release this part of the Skerningham site for employment uses, is to be considered when the Local Plan is next reviewed. Draft Policy H10 and the supporting text at paragraph 6.11.10 confirms that, following the Local Plan Review, there is a need for additional employment land. This area of Skerningham Garden Village was identified as a potentially suitable location for employment development in the context of its proximity to the A66 Strategic Road Network, and the fact that it provides a logical extension to the nearby employment uses also located off the A66 to the east of Darlington. This part of Skerningham Garden Village is identified as a later phase of	The comment supports the increase in the number of dwellings to be delivered in the plan period from 1,650 to 1,950. However, notes inconsistent phrasing when referring to the allocation, which needs to be standardised. They would support using 'Skerningham Garden Village'. Also note the use of 'H 10' and 'H10' – which could be standardised to help with text searches. They support the changes made to paras. 3-4 of the policy. Wish for more clarity in the site name for the new employment site (Ref. 505) in Policy E2 to make absolutely clear that the employment area is to be located on land north of the A1150 and east of the River Skerne. They support the principle of the new employment allocation.	Skerningham Estates Ltd is one of the three pincipal parties bringing forward Skerningham Garden Village. While their support for the principle of the proposed employment allocation at Skerningham is welcomed, the Council has held discussions with Tviot Way (another principal party) to develop a new mixed use application for their land at at the south east of Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fulfill the principles of the garden communities programme and Tviot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council therefore intends to re-integrate the two allocations proposed in the Reg. 18 Plan to form one mixed use allocation - with the location of the proposed emplyment area within the Tviot Way site to be shown on the Masterplan Framework. The need to standardise the naming of the site is noted. The Council has therefore decided to use the name 'Skerningham Allocation' or just 'Skerningham'. This should in no way be considered a reduction in support for the Garden Community concept and instead reflects the Local Plan's role in setting out the delivery of the allocation.	Yes	Correct reference to 2036 that remains in the third line of Policy H10. Standardise phrasing as 'Skerningham Allocation(s)' and standardise policy numbering. Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.
LPR110	Housing	James Seabury	Banks Group		Policy	10	H10- Skerningham - site allocation (strategic)		Neutral	Banks Property support the continued allocation of the Beaumont Hill site for housing which lies within the wider Skerningham site. Whilst being part of the Skerningham Strategic Allocation, Banks Property request that land at Beaumont Hill is allocated as a stand-alone housing proposal. Banks Property have worked closely with other main developers within the Skerningham strategic allocation and have fed into the Skerningham Masterplan. Additionally, Banks Property have undertaken more detailed masterplanning for the land under our control to the west of the railway line (East Coast Mainline), as included within part of a pending outline planning application. Our vehicular access proposals have been designed to a suitable standard to form the first part of the northern distributor road to serve the wider Skerningham development. A second roundabout has been designed within the site to serve the development to the north and south and to provide a spur for a future crossing of the East Coast Mainline. The geometry and gradients of the road and second roundabout have been carefully designed to ensure the minimum clearance of the railway line can be achieved with an area left undeveloped allowing sufficient 'flex' for the exact location of a bridge to be defined at a later date. The junction and road designs will ensure that the proposals bring forward the delivery of a local plan allocation without prejudicing the wider Skerningham proposals. Furthermore, the highways infrastructure proposed will secure the early delivery of a key part of road infrastructure required to serve the wider Skerningham development and will not be required to be upgraded at a later date. Regardless of Beaumont Hill having its own red line, any proposal would still be assessed against Policy H 10 and the Skerningham Masterplan Framework plan which would ensure that key highways infrastructure is provided to serve the wider development. Banks Property's promotional material demonstrates how the site could be developed in this manner. The inclusion of a stand-alone red line at Beaumont Hill would acknowledge that the site will act as an urban extension on the A167 corridor and would be more aligned with housing commitments yet to be built to the west of the A167. The site will feel very remote and separate to the main Skerningham Strategic Allocation area due to the severance caused by the East Coast Railway Line. Such an approach would be consistent with the council's HELAA assessment which considered the suitability of the site for development by itself.	Banks Group support the continued allocation of the Beaumont Hill site, but wish for it to be a standalone site and not part of the larger Skerningham Garden Village allocation. The comment sets out the actions undetaken by Banks Group as part of their current planning application to enable the delivery of the western end of the Skernigham Local Distributor Road. The argument for seperating the allocation is based on the serevance caused by the East Coast Mainline and its proximity to existing/proposed development within Beaumont Hill.	As noted within the comment, the Beaumont Hill site has been heavily intergrated into the overall scheme for Skernigham Garden Village and is covered by both a Masterplan and a Design Code as part of the single allocation. While the serevance caused by the ECML is acknowledged, the Council considers that there are significant benefits to allocating all housing development along the north eastern edge of Darlington as one allocation to encourge the delivery of one comprehensive, integrated development, with a development partners working together to achieve a common purpose. Issues related to intergration into the existing urban form of Beaumont Hill are considered matters of good design which should be addressed regardless of the allocation boundary.	No	None
LPR110c	Housing	James Seabury	Banks Group		Policy	10	H10- Skerningham - site allocation (strategic)		Neutral	Banks Property support the continued allocation of Skerningham. To reflect that the Skerningham Design Code is adopted and the Skerningham Masterplan agreed, a number of amendments to the policy wording are proposed to simplify the policy; Two Three allocations are identified on the North side of Darlington at Skerningham (Site References: 251 & 505) to secure the delivery of up to 4,500 dwellings and approximately 22ha (net) of employment space. During the plan period to 2042 this site is expected to deliver approximately 1,950 dwellings of which 600 dwellings are to be delivered on land adjacent to the A167 and west of the East Coast Mainline on the western part of the allocation; and 1,350 dwellings to be delivered on land to the east of the east coast mainline on the eastern part of the allocation with initial phases located on land adjoining Barmpton Lane. Development at Skerningham will be permitted in accordance with the principles set out below and other relevant policies in the Local Plan. Following text struck through - "A comprehensive masterplan and infrastructure phasing plan for Skerningham Garden Village, led by the applicants and prepared in consultation with the community, was agreed with the Council on 3rd December 2024. This masterplan informs the mix of uses, layout, scale, design, provision of local and strategic infrastructure including social and community facilities and phasing of the proposed development. The masterplan is based on a strong understanding of the characteristics of the site and its surrounds and incorporates the key principles for the development as set out in points a. to j. below." See submitted attachment. To ensure that a cohesive development is delivered at Skerningham, the Council will only approve planning applications that adhere with the agreed comprehensive masterplan and the Council's Skerningham Garden Village Design Code and deliver the necessary local and strategic infrastructure, including social and community facilities, at the appropriate phase of the development identified in the infrastructure phasing plan to support the coordinated provision of infrastructure and housing development. Future revisions of the masterplan must continue to be based on the design approach and principles established in the Council's Design Code for Skerningham and should incorporate the points set out in a. to j. below. g. The highways modelling undertaken to support the local plan was undertaken several years ago. To reflect	Banks Property continue to support the allocation of Skerningham. However, they note that the highway modelling undertaken to support the Local Plan was undertaken some years ago. They suggest that the triggers for the implementation of the Distributor Road should be reviewed to take into account changing habits and data.	The Council is happy in-principle to review the triggers subject to receiving and reviewing updated highways data. In the absence of this data, the triggers are being maintained to protect the highway network.	Yes	Review triggers based on updated highway data.
LPR116	Housing	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Site	10			Object	Our Client is the freehold owner of approximately 63 hectares of land at Bishopton Lane ('the Site'), located immediately north of the A1150/A66. A Site Location Plan showing our Client's land interests is submitted alongside these representations at Appendix 1 for completeness. The adopted Darlington Local Plan (2022) allocates our Client's land for housing development as part of the wider Skerningham Garden Village Allocation within Policies H2 and H 10. The Allocation, comprising 429.19 hectares of land, is identified to deliver up to 4,500 dwellings within Policy H2, with approximately 1,650 dwellings to be delivered during the current plan period up to 2036. Policy H2 is entitled "Housing Allocations (Strategic Policy)" and the accompanying Local Plan Policies Map confirms that the Site forms part of the area of land allocated by Policy H2 to provide up to 4,500 houses. Our Client previously submitted representations to the Council's 2025 Call for Sites consultation, to promote the Site for residential land uses as part of the wider Skerningham Allocation. As set out within those representations, the Site in question is suitable, available and achievable, with a live outline planning application (Ref. 25/01408/OUTE) for a new residential neighbourhood of up to 850 dwellings including C2 (Residential Institutions) and C3 (Dwelling houses) uses, open space, means of access, supporting infrastructure and associated works currently pending determination at the time of writing. Despite the existing allocation of our Client's land for residential land uses and a subsequent planning application duly submitted to deliver that objective of the Development Plan, as well as representations confirming the Site's continued suitability, availability and achievability for residential land uses, the Regulation 18 document now proposes to allocate our Client's land under Draft Policy E2 (Employment Allocations (Strategic Policy)) as Site 505 for 22.1 hectares (net) of employment floorspace only, across B2, B8 and/or E(g) land uses. If adopted, this would replace the Site's current housing allocation under Policies H 2 and H 10 of the adopted Local Plan. The total quantum of residential development at Skerningham Garden Village remains at 4,500 dwellings, but now purposely proposes to exclude our Client's land.	Tviot Way Investments is one of the three principal parties delivering Skerningham Garden Village. They note that the Reg. 18 Plan proposes to re-allocate their land within Skerningham for employment despite a live planning application (25/01408/OUTE) for residential development.	Tviot Way Investments became in involved in Skernigham Garden Village following the adoption of the current plan and late in the development of the Skernigham Garden Village Comprehensive Masterplan and Design Code, the requirements for which were detailed in Policy H10. The Council has held discussions with Tviot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fufill the principles of the garden communities programme and Tviot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. The Council therefore intends to re-integrate the two allocations proposed in the Reg. 18 Plan to form one mixed use allocation - with the location of the proposed emplyment area within the Tviot Way site to be shown on the Masterplan Framework.	Yes	Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks.

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LPR120	Housing	Councillor Bryony Holroyd			Site	10			Neutral	a.In the viability assessment, it was determined that part of the site would be "high value" in order to make the site viable. This would trigger higher % affordable housing delivery. The updates to the Local Plan should identify the location of this area, and number of homes, and affordable homes that it will provide. b.Also, the Local Plan review needs to specifically identify and provide evidence of need for employment land on the site (especially bearing in mind Tiviot Way investments for Satnam have already put in a planning application for housing on the land that was always potentially going to be employment land). This must be very well evidenced, given we know they are likely to make recourse to the law. c.The landfill - greater clarity is required as to how the boundary treatment of the old landfill site west of Barmpton Lane - which is still producing gas - will be treated. Normally homes should not be built within 50m of the site. Detailed monitoring work must be required to ensure no danger to future residents. d.In Policy DC1, paragraph under (i), p.60, the Skerningham Design Code states that no reds are allowed, when rated against the assessment criteria. However in this revision, the Local Plan says a red IS allowed - we object strongly to this. The Design Code was worked up with community input and must not be degraded in its implementation. e.Darlington Golf Club has decided not to relocate, and is currently seeking a new access road through Elm Tree Farm site. i.As that's now a long-held decision, the golf club land should be removed from the area allocated for housing. ii.However, there is still mention of "if the golf club relocates", yet the pink star on the policy map to show its potential relocation location has been removed. If this wording is to remain (we would prefer that it be deleted completely), the location MUST be marked on the policy map, and it must be marked on a site south of the community woodland. iii.Also to note that the land between the local distributor road and the woodland is allocated for nutrient neutrality and biodiversity net gain improvement, which must be protected and monitored as such for 30 years. This is not compatible with a golf course (generally heavily fertilised and so far more limited in biodiversity) relocating to it. iv.It's reported that Dinsdale Golf Course has closed, and it would be in Theakstons' interests to help Darlington Golf Club to relocate there. Were it to move, this would be a far more suitable relocation, to an existing course, eliminating negative environmental impacts of creating a new golf course.	The comment notes that part of the Skerningham Allocation was previously defined as 'high value' and requests the updated Local Plan identify and consider this area. Notes that a planning application has been recieved by the Council for housing by Tiviot Way Investment for the area that was proposed to be re-allocated as employment land in the Reg 18 Draft Local Plan. Suggest the proposed employment allocation will need to be well evidenced. Notes that Barmpton Quarry landfill site is located within the allocation boundary and requests greater clarity on how this will be treated. Comment suggests that changes to Policy DC1 do not align with the Garden Village Design Codes. The passing criteria between the documents are different. Requests that Darlington Golf Club be removed from the boundary of the Skerningham Allocation on the grounds that it is not relocating. If the club is relocating, requests the the indicative marker for a relocation is re-added to the Masterplan Framework associated with Policy H10.	It is believed this comment relates to the previous Local Plan Viability Assessment. Local Plan viability work is currently being updated and this will likely result in changes to valuation areas which will be set out in the Viability Assessment. The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fulfil the principles of the garden communities programme and Tiviot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council therefore intends to re-integrate the two allocations proposed in the Reg. 18 Local Plan to form one mixed use allocation - with the location of the proposed employment area within the Tiviot Way site to be shown on the Masterplan Framework. Barmpton Quarry Landfill will be considered as part of the decision making process. Applications within the vicinity of the former landfill site will need to take its presence into account as part of their proposals and suggest adequate mitigation measures as required. Policy DC1 has been modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more reds will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated. It is not intended that this requirement should impact upon the Skerningham or Burtree allocations which have their own design codes. It is intended to raise design standards outside these areas. However, the resource implications of this measure have also been highlighted in responses to	Yes	Updating of valuation areas will be completed following conclusion of viability work. Re-intergrate the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Frameworks. Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints. References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development...' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.
LPR120j	Housing	Councillor Bryony Holroyd			Site	10			Object	a.It is unsuitable to put a bypass / through-road through a housing estate, for safety, noise, health, accessibility by active transport and sustainability reasons. A bypass and a local distributor road perform very different functions - mashing them together would result in the worst of both worlds. It's unclear how the Skerningham Design Code requirements for the distributor road could be met, if it were also a bypass. For example, a narrow road with a village feel (to limit speed to max 40mph), with priority crossings for pedestrians, cyclists and horse-riders to green-space beyond. b.Wording stating that the delivery of Skerningham GV is agnostic of whether or not the DNLR is delivered has been removed - this must stay in the Local Plan. As the DNLR impacts the Design Code and Masterplan, its route must be decided prior to the Local Plan review being finalised, or any planning applications for this area being permitted, as they will be impacted. c.Protection for the original route of the Link Road is being removed as part of these amendments: this should not occur - the original route must remain safeguarded until the final route of any DNLR is decided. d.Viability of Skerningham GV - initially the cost of a distributor road was quoted as £44m including the rail crossing. The recent TVCA Options Appraisal for DNLR (route 2 or 2a) quotes £140m - at this cost, is Skerningham GV still viable? Its viability must be urgently reassessed. e.Roads open up new areas for housing. As much of the site beyond the distributor road was designed to be green space for nutrient neutrality and biodiversity net gain, it cannot also be used as a site for a larger new road, and in future be developed for housing, as land protected for NN / BNG MUST be monitored and retained in that usage for 30 years. f.Policy H10, points f) and g) still talk about the local distributor road network (where other wording has been changed to "local link road") - the wording used should be consistent, and we believe the words "local distributor road" should be used in all cases, NOT "link road" (as we are told the route of the DNLR has not yet been decided and this would pre-determine it). g.Policy H10, point g) ii) says "Prior to the completion of the development on the western part of the allocation (between the A167 and the East Coast Mainline) the remaining section of the local distributor road to the East Coast Mainline shall be completed." This conflicts with the Masterplan which says that in Phase 1 when 450 houses are delivered on the western part of the allocation (between the A167 and the East Coast Mainline) "the section of the Local Distributor Road between the A167 and East Coast Mainline shall be	Respondent comments that it is unsuitable to put a bypass (Darlington Northern Link Road) through a housing development. Combining the DNLR with the Skerningham Local Distributor Road would result in significant issues, and it is unclear how the standards in the Design Code SPD could be met in this scenario. Requests the retention in the Plan of wording stating that delivery of Skerningham is not reliant on the DNLR and suggests the Local Plan Review cannot be finalised until the route of the DNLR is determined. Suggests protection for the original route of the DNLR are being removed as part of the review. The comment also questions the viability of Skerningham based on the recent TVCA Options Appraisal for DNLR. Notes changes to wording regarding the Local Distributor Road in the Transport Chapter. Also notes a potential discrepancy between the Policy H10, point g) ii) and the agreed Masterplan regarding the provision of the first section of the Distributor Road. Comments regarding a recent road options appraisal that considered prioritising signage and satnav use of the already-existing route for HGV traffic from Teesside heading north, up the A19, then across the A689 to the A1(M) at Sedgefield.	The route of the Darlington Northern Link Road is not protected within the current adopted Local Plan and there are no plans to safeguard a route at this stage. The TVCA are leading the development of the DNLR and there is no confirmed route at this stage. The impact of the DNLR if it were to route through Skerningham would need to be carefully considered, and a review of the Design Code and the Masterplan may well be necessary in those circumstances. However, given the unknowns with the route, delivery, and specification of the DNLR, it is not considered practicable to trigger such a review through writing a policy mechanism into the Local Plan at this time. Regarding delivery, while wording has been change in the Transport Chapter, it should be noted that the triggers for the provision of the distributor road remain in Policy H10 - the Council is proceeding on the basis that Skerningham will have to support itself and deliver all its own infrastructure. It should be noted that the Council has examined the costs associated with key infrastructure for the distributor road provided by Skerningham Estates and is satisfied the costings are robust and that Skerningham remains viable as a whole. The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopton Lane and Barmpton Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/00772/FULE would deliver 441 dwellings as part of Phase 1 - which falls below the cap. The structure of the Masterplan allows for the construction of up to 450 dwellings as part of Phase 1. The applicant is aware that the Council will seek to restrict further occupations by planning condition until the first section of the distributor road is completed. Consideration regarding the A19 are beyond the scope of the Local Plan. It is recommended these comments be addressed to the TVCA via there ongoing	No	None
LPR125&126e	Housing	Josh White	Natural England		Policy	10	H10 - Skerningham - Site Allocation		Support	We welcome Policies H 10 and H 11, which include robust green infrastructure requirements; however, these could be strengthened by explicitly requiring masterplans to demonstrate alignment with LNRS priority areas and wider ecological networks beyond site boundaries.	Comment suggest explicitly requiring the masterplans for the Skerningham and Burtree allocations to demonstrate alignment with LNRS Priority Areas and with wider ecological networks beyond site boundaries.	The Council will consider how this recommendation can be introduced to Policies H10 & H11.	Yes	Consider how to require the masterplans for the Skerningham and Burtree allocations to demonstrate alignment with LNRS Priority Areas and with wider ecological networks beyond site boundaries. For H10 it is recommended this is intergrated into Point 1.
LPR127, 128 & 129q	Housing	Ros Kain	Historic England		Site	10			Neutral	See App B submission. A strategic allocation, proposed to cover two allocations, and is renamed Skerningham Garden Village. The policy reference (H10) is unaltered. The total residential yield over the Plan period remains the same. A site-specific Design Code SPD was adopted in September 2023. A Masterplan was agreed in December 2024. The Local Plan review earmarks employment use within the site boundary. Shown as an area to the east of the River Skerne (Site 505 on the Policy Map). Policy E2 has been amended to reflect this. Site 505 would provide approximately 22ha of employment use. Our only comment relates to the accuracy of the Heritage Impact Assessment (HIA) considering the partial change from residential to employment use in part of the strategic site. The HIA dates to 2019, as referenced in the policy text. DBC should consider whether the proposed employment use, in the south east part of the site, could have the potential to have a greater impact on heritage assets than residential use. Scale, massing, layout, infrastructure and traffic generation for example. Suggested change - Clarify if the SPD covers the employment use (site 505). We support the revisions to the policy to include the Design Code. We support the retention of the following text specific to the historic environment but ask DBC to review and amend the 2019 Heritage Impact Assessment (HIA) refer to our guidance The Historic Environment and Site Allocations in Local Plans Proposals will be required to conserve, and where appropriate enhance designated and non- designated heritage assets within and in the vicinity of the site including their setting in accordance with policy ENV1. The design and layout should be carried out in accordance with the recommendations of the Darlington Local Plan Heritage Impact Assessment (2019) to avoid and minimise harm and provide opportunities for enhancement where appropriate.	Notes that the Heritage Impact Assessment for the updated employment allocation dates from 2019. The Council should consider if a proposed employment use could have greater impact on heritage assets than residential development. Suggest clarifying that the Design Code SPD covers the employment allocation.	The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fulfil the principles of the garden communities programme and Tiviot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council therefore intends to re-integrate the two allocations proposed in the Reg. 18 Local Plan to form one mixed use allocation - with the location of the proposed employment area within the Tiviot Way site to be shown on the Masterplan Framework. The Heritage Impact Assessment will therefore need to be updated to take into account this mixed use allocation.	Yes	Update HIA as necessary.
LPR021a	Housing	Mr Martin Swainston			Site	10	H10 – Skerningham – Site Allocation (strategic)		Object	This will substantially damage the local environment with increased traffic, sewage and all ready stretched services in the area.	Objection to Skerningham housing allocation. It will impact on the local environment, traffic, sewage and local services.	Skerningham is an existing housing allocation and is considered a suitable location for new housing. Impacts mentioned will be mitigated via policy requirements for the development and through the decision making process.	No	None
LPR030	Housing	Richard Branton			Site	10			Object	As the owner of land opposite to The White Horse pub I object to my property being classed as a wildlife area as it is agricultural and as such can be ploughed up or used in any other way that I choose. The idea of creating a through road for wildlife to access the A167, and be run over, seems at odds with trying to protect it. Maybe local children will enjoy trying to identify the roadkill but I do not feel that this should be encouraged. In the past a Planning Inspector stated that my land would be suitable for housing along with adjoining land to the north and east so I fail to see why his views have been disregarded. A double row of housing would protect the wildlife and may be enough to persuade me to dedicate the remainder of the site for wildlife. At the present time I am not inclined to do so. No one from the Council has approached me to discuss the proposed use of my land.	The comment is from a landowner of a parcel of land opposite the White Horse Pub, Harrowgate Hill. It objects to this land being classified as a 'wildlife area' and suggests that a Planning Inspector has previously suggested this land would be suitable for housing. A map of the land has not been provided.	The exact boundaries of this landowner's holdings cannot be determined without a specific map. However, there is a parcel of land to the south of the area of Phase being brought forward by Banks Group. This is presently outlined as a potential area for 'strategic green infrastructure'. However, were the landowner to bring forward an application for residential development, the Council would consoder it on its own merits.	No	None
LPR039a	Housing	Sophie Colella			Site	10			Object	"The scale of development proposed at this site is significant and will clearly have a major impact on the surrounding area. While I understand the need for growth, it is not clear how the supporting infrastructure—particularly transport, education and healthcare—will be delivered in practice alongside the pace of development. There is a concern that these elements are described more as ambitions rather than clearly defined commitments, particularly in the early phases of development. This creates a risk that housing could come forward before the necessary infrastructure is in place, placing additional pressure on existing communities and services. It would be helpful to see clearer detail on how and when infrastructure will be delivered, and how the development will be properly connected and integrated with the existing town from the outset."	Comment quries how the supporting infrastructure for Skerningham Garden Village will be delivered. Highlights concerns that the elements desribed in the policy are ambitions and not defined commitments and that the residential development could come forward without supporting infrastructure.	Policy H10 is only one part of a suite of policy documents that govern the development of Skerningham Garden Village. The policy provides trigger points based on occupations which are expanded upon in the site Masterplan, the current version of which was agreed with the Council in December 2024. This includes an infrastructure phasing plan that sets out when elements of infrastructure will be delivered. The policy provides a basis for application which do not provide the necessary infrastructure to be refused as contrary to the Masterplan and/or the Design Code.	No	

LPR044	Housing	Vanessa			Site	10			Object	Skerningham Garden Village Part of the site was defined as "high value" -these areas need defining, how many homes it must deliver, and the number of affordable homes it would trigger. Excellent evidence is required of need for employment land, on land NE of Great Burdon, given Tivlot Way investments have put in planning application for housing. Greater guidance must be provided on how Barmpton ex-Landfill will be managed safely - minimum distances of homes, monitoring & invasive investigations required. Policy DC1, paragraph under (l), p.60 now says reds ARE allowed in Design Code rating - object STRONGLY to this downgrade. It must revert to no reds allowed! Darlington Golf club decided not to move and is seeking a new access road. Its land should therefore be removed from the housing allocation. The "if it moves" location marker has been removed. We'd prefer mention of a move be removed from the plan, but if not, this marker must be replaced, on land south of the community woodland. It must also be on land not allocated for BNG or NN (which must be retained for 30yrs) as these are not compatible with golf course use. Dinsdale golf course has now closed, this would be the best relocation site (cost & environmentally) to an already existing course, if any move occurred.	The comment notes that some areas of Skerningham were previously defined as 'high value' - it is understood this was in previous Local Plan viability work. Respondent notes that good quality evidence will be required for the allocation of proposed employment land north east of Great Burdon given the submitted planning application for residential uses in this area. It is suggested that the Local Plan should contain greater guidance on how the ex-landfill site at Barmpton Quarry within the allocation boundary will be managed safely. Comment observes that changes to Policy DC1 are currently unclear as to how they relate to the Garden Village Design Codes. The passing criteria between the documents are different. Requests that Darlington Golf Club be removed from the boundary of the Skerningham Allocation on the grounds that it is not relocating. If the club is relocating, requests the the indicative marker for a relocation is re-added to the Masterplan Framework associated with Policy H10.	It is believed this comment relates to the previous Local Plan Viallbility Assessment. Local Plan viability work is currently being updated and this will likely result in changes to valuation areas which will be set out in the Viability Assessment. The Council has held discussion with Tivlot Way to develop a new mixed use application for their land at Skerningham. The Council is keen to see employment land within the Skerningham Allocation to fulfil the principles of the garden communities programme and Tivlot Way's site, with quick access to the A66, is the strategically the most sensible area within Skerningham for this provision. In line with these discussions, the Council therfore intends to re-integrate the two allocations proposed in the Reg. 18 Local Plan to form one mixed use allocation - with the location of the proposed employment area within the Tivlot Way site to be shown on the Masterplan Framework. Barmpton Quarry Landfill will be considered as part of the decision making process. Applications within the vicinity of the former landfill site will need to take its presence into account as part of their proposals and suggest adequate mitigation measures as required. As part of the Reg 18 Plan, Policy DC1 has been modified to include a requirement for major new residential development to conduct a Building for a Healthy Life Assessment (or successor document). Schemes should secure as many greens as possible, whilst minimising the number of ambers. Schemes with one or more red will not be acceptable and will be refused planning permission unless significant overriding reasons can be demonstrated. It is not intended that this requirement should impact upon the Skerningham or Burtree allocations which have their own design codes. It is intended to raise design standards outside these areas. The Policy will need to be reworded to make this clear.	Yes	Updating of valuation areas will be completed following conclusion of viability work. Policy DC1 needs to be updated to either modify the wording regarding Building for a Healthy Life or to remove the new requirement based on resourcing constraints. References to the golf club remaining in-situ should be clarified to (for example) 'were the golf club site to be brought forward for development…' This would clarify that there is now no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.
LPR106a	Housing	Andrew Keir	Councillor/Resident		Site		6		Neutral	Finally I request the introduction of a weight restriction on the traffic along Barmpton Lane. The current level of heavy vehicle usage raises the concerns regarding road safety, infrastructure impact, and residential amenity. A weight limit would provide a proportionate and necessary safeguard for local residents. I would welcome these proposals being fully considered and incorporated within the local plan review, Ensuring the protection of green spaces and addressing transport impacts ate key to delivering a balanced and sustainable plan for Darlington.	Requests a weight restriction be introduced on Barmpton Lane.	Not an issue to be considered as part of the Local Plan.	No	None
LPR110d	Housing	James Seabury	Banks Group		Policy	2	H2 - Housing Allocations (strategic)		Neutral	Banks Property support the continued allocation of the Beaumont Hill site for housing which lies within the wider Skerningham site. Whilst being part of the Skerningham Strategic Allocation, Banks Property request that land at Beaumont Hill is allocated as a stand-alone housing proposal. Banks Property have worked closely with other main developers within the Skerningham strategic allocation and have fed into the Skerningham Masterplan. Additionally, Banks Property have undertaken more detailed masterplanning for the land under our control to the west of the railway line (East Coast Mainline), as included within part of a pending outline planning application. Our vehicular access proposals have been designed to a suitable standard to form the first part of the northern distributor road to serve the wider Skerningham development. A second roundabout has been designed within the site to serve the development to the north and south and to provide a spur for a future crossing of the East Coast Mainline. The geometry and gradients of the road and second roundabout have been carefully designed to ensure the minimum clearance of the railway line can be achieved with an area left undeveloped allowing sufficient 'flex' for the exact location of a bridge to be defined at a later date. The junction and road designs will ensure that the proposals bring forward the delivery of a local plan allocation without prejudicing the wider Skerningham proposals. Furthermore, the highways infrastructure proposed will secure the early delivery of a key part of road infrastructure required to serve the wider Skerningham development and will not be required to be upgraded at a later date. Regardless of Beaumont Hill having its own red line, any proposal would still be assessed against Policy H 10 and the Skerningham Masterplan Framework plan which would ensure that key highways infrastructure is provided to serve the wider development. Banks Property's promotional material demonstrates how the site could be developed in this manner. The inclusion of a stand-alone red line at Beaumont Hill would acknowledge that the site will act as an urban extension on the A167 corridor and would be more aligned with housing commitments yet to be built to the west of the A167. The site will feel very remote and separate to the main Skerningham Strategic Allocation area due to the severance caused by the East Coast Railway Line. Such an approach would be consistent with the council's HELAA assessment which considered the suitability of the site for development by itself.	Banks Group support the continued allocation of the Beaumont Hill site, but wish for it to be a standalone site and not part of the larger Skerningham Garden Village allocation. The comment sets out the actions undetaken by Banks Group as part of their current planning application to enable the delivery of the western end of the Skernigham Local Distributor Road. The argument for seperating the allocation is based on the serevance caused by the East Coast Mainline and its proximity to existing/proposed development within Beaumont Hill.	As noted within the comment, the Beaumont Hill site has been heavily intergrated into the overall scheme for Skernigham Garden Village and is covered by both an agreed Masterplan and a Design Code as part of the single allocation. While the serevance caused by the ECML is acknowledged, the Council considers that there are significant benefits to allocating all housing development along the north eastern edge of Darlington as one allocation to encourge the delivery of one comprehensive, integrated development, with a development partners working together to achieve a common purpose. Issues related to intergration into the existing urban form of Beaumont Hill are considered matters of good design which can be addressed through the planning application process.	No	None

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Se	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR035	Employment for Economic Growth		Sterling Capitol	Anthony Greally, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne, NE1 1RF	Site	Site Ref. 433 / Burtree Employment Park			Support	Support for Inclusion of Site 433 Burtree Employment Park	Support for Inclusion of Site 433 Burtree Employment Park	Inclusion of 433 site Burtree Employment Park is appreciated	N	None
LPR035a	Employment for Economic Growth		Sterling Capitol	Anthony Greally, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne, NE1 1RF	Policy		E2: 'Employment Allocations (Strategic Policy)'		Support	Allocation of Site 433 in Policy E2 New Employment Site welcomed	Allocation of Site 433 in Policy E2 New Employment Site welcomed	Allocation under E2 supported	N	None
LPR035b	Employment for Economic Growth		Sterling Capitol	Anthony Greally, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne, NE1 1RF	Site	Site Ref. 433 / Burtree Employment Park			Suggestion	The organisation, Sterling Capitol, we have submitted the representations on behalf of have queried whether it would be possible to refer to the site allocation as 'Capitol Park Darlington' in the Local Plan review. We would be grateful if you could provide a view on this.	Name Change request	Not at this stage as it is a commercial Marketing name on current agricultural land.	N	None
LPR052j	Employment for Economic Growth	Louise Tait	Environment Agency		Site	Ref. 506 Burtree Garden Village		Employment	Neutral	Site ref: 506, Burtree Garden village The is an ordinary watercourse along southern boundary of the site which is culverted downstream before joining the West Beck in Faverdale to the west. This confluence is an existing source of flood risk off site. No modelling exists for this watercourse and any impacts of flooding are unknown, however caution should be exercised when building near or over this river due to its potential downstream influence at Faverdale.	Apprehension of Flood risk in future development	Will be dealtwith in futue planning applications	N	None
LPR052k	Employment for Economic Growth	Louise Tait	Environment Agency		Site	Ref. 505 Skerningham GArden Village		Employment	Neutral	The River Skerne and Carcut Beck are designated main rivers within the boundary of this site. Both pose significant flood risk on site. The confluence of the Carcut Beck and River Skerne is a significant source of flooding both on site and downstream as far as the A1150 road. Development should be restricted as much as possible in this area. No development should take place within flood zone 3b and should be avoided, where possible, within flood zone 3a or developers will be to liable to provide flood storage compensation. There is a large area of floodplain to the far north of the development allocation, which shows a significant increase of flood area in future years. Development here should be restricted as much as possible.	Outlining Flood risk and locations of no development	Adhere to in future planning applications	N	None
LPR052l	Employment for Economic Growth	Louise Tait	Environment Agency		Site	Ref. 360 Heighington Lane North		Employment	Neutral	The Demon's Beck runs directly through the proposed site and is a source of significant flood risk to Heighington. The river surges down Heighington Lane due to an upstream culvert which then causes flooding in the industrial area to the immediate west of the railway line. In future, climate change is expected to increase the area at risk of flooding from this mechanism to include the industrial area to the east of the railway line and the line itself. Any alterations to flow path, ground levels or other blockages within existing and future flood zone 3 areas will require hydraulic modelling of the Heighington Industrial Estate to determine the impacts.	Outlining Flood risk and locations of no development	Detail to be added to the allocation statement on future flood risk.	Yes	Add detail to allocation statement for site 360 Heighington North on future flood risk.
LPR052m	Employment for Economic Growth	Louise Tait	Environment Agency		Site	Ref. 474 East Street		Employment	Neutral	There is a both current day and future risk of flooding in this area from the nearby River Skerne. The area immediately east of the rooftop car park on Crown Street is in flood zone 3. Climate change will extend the area at risk of flooding to beyond Crown Street to in the southern section, and to the fringes of the public library in the northern section. Any new development in this area must be outside of flood zone 3b and it will be important to consider safety with regard to floor levels and accessibility in compliance with the National Planning Policy Framework. Floor level and access requirements also apply to change of use to existing buildings.	Outlining Flood risk and locations of no development	Detail will be added to the allocation statement on flood risk.	Yes	Add detail to allocation statement 474 East Street on the sites flood risk.
LPR052n	Employment for Economic Growth	Louise Tait	Environment Agency		Site	Ref. 433 Burtree employment park		Employment	Neutral	Care should be taken when developing around the ordinary watercourse in the northern section of the site. We do not have any modelling data for this area, however the river is culverted immediately downstream which may cause flooding issues on site. Additionally, any surface water schemes directing additional water into the small watercourse may overwhelm the existing culvert capacity.	Outlining Flood risk and locations of no development	Adhere to in future planning applications	N	None
LPR053d	Employment for Economic Growth	Patricia Meredith	Resident		Section			7. Employment for economic growth	Object	While some brownfield allocations are welcomed, I fail to understand why a key site such as the Rolling Mills on Whessoe Road remains unallocated. Especially bearing in mind it is close to schools, shops, doctors etc. Employment land near the new Auction Mart is in my opinion unsustainable due to car dependency and poor transport connectivity.	Cardependency and poor transport at Auction Mart	Would be considered in future Planning as one material consideration	N	None

LPR058a	Employment for Economic Growth	Colin Griffiths	Satnam Planning Services for Tiviot Way		Section			7. Employment for economic growth	Unknown	The justification for any employment floorspace within site 505, for example as part of a mixed use residential led allocation with a component of employment floorspace, would be reliant upon: a.The Council carrying out a thorough assessment of its need for employment floorspace, and the conclusions of that assessment establishing that there is a need to allocate land for employment purposes beyond those extant allocations identified within the adopted local plan, and b. The Council carrying out a thorough assessment of the land available to it to meet any need identified, and the conclusions of that assessment establishing that some further land is required to be allocated to meet an identified need, and c. If following a site search assessment, land at site 505 is found to be suitable, available, achievable and thus deliverable for employment use, and d. If following the undertaking of a viability assessment of the Skerningham Garden Village strategic site, it is established that provision of housing led mixed use housing and employment development on site 505 could generate sufficient surplus value to fund the provision of onsite infrastructure and make the required contribution to offsite infrastructure. ii. If the above-described evidence-gathering steps were taken and the conclusions reached that site 505 should be allocated as a mixed use residential led allocation with a component of employment uses, and	Fact and need for site assessment stated.	Helaa assessemt for Site 505 undertaken	N	None
LPR064 & 065j	Employment for Economic Growth	Nick Pleasant	Stantec on behalf of Vistry		Section			7. Employment for economic growth	Object	The Draft Plan is essential to drive development, regeneration and investment in the Borough over the long term (a 15 years plan period), and requires a positive and proactive approach. In this strategic context, Vistry considers the lower jobs target within the draft plan (reducing the employment target from 7,000 new jobs to 6,400 new jobs) is entirely at odds with the wider regeneration and growth initiative being sought more widely by the council. There is no apparent reason to aim for anything other than the most ambitious and deliverable level of economic and population growth in accordance with paragraphs 85 to 89 of the NPPF. There is no evidence or explanation which demonstrates that a lower jobs target is appropriate. This reduction is counterintuitive when the Draft Plan continues to emphasise that Darlington is an attractive location for employment benefitting from a strategic connectivity position between the Tees Valley, North East and North Yorkshire, with a ready labour supply and significant planned infrastructure investment. No labour market, viability or demand-based evidence has been published by DBC demonstrating that previous employment ambitions are no longer realistic or desirable. Even if a reduced level of jobs growth was justified (which based on current evidence does not seem to be the case), the Draft Plan must still plan positively for future economic activity and employment land. This level of economic ambition proposed in the plan (which has been dialled down from the adopted plan) is still not matched by the proposed housing growth, resulting in a disconnect between planned jobs and planned homes, undermining the Plan's ability to support a balanced and sustainable labour market. Ultimately, a lack of quality	Lower job target of 6400 new jobs for new period is not appropriate	Evidence for Job growth by Oxford Research comes to conclusin that job growth has peaked through Amazon and DEC in the last 7 years	N	None
LPR064 & 065l	Employment for Economic Growth	Nick Pleasant	Stantec on behalf of Vistry		Policy		E1 - Safeguarding Existing Employment Land (Strategic)		Neutral	Vistry notes from the Draft Plan policies map that the two strategic employment locations allocated within the Draft Plan are located to the north west and east of the settlement edge of Darlington. At present, there is no direct connection between these two locations, with the majority of traffic movements routed through or south of Darlington town. The delivery of the Darlington Relief Road will change movement patterns by providing a direct strategic connection between the two sites and a new link between the A66 and the A1(M) to the north of Darlington. This infrastructure improves accessibility and establishes a clear spatial framework for future growth.Vistry acknowledges that DBC must not underestimate the significance of the Relief Road as a catalyst for growth in northern Darlington, or its long-term implications for economic growth, job opportunities and investment. The delivery of strategic transport infrastructure of this scale demands a comparable ambitious level of housing growth to fully maximise its benefits. However, the Draft Plan does not adequately address the consequences should the timing, funding or delivery of the Relief Road be delayed or altered. In the absence of the road, strategic growth locations may be materially constrained due to unresolved transport impacts and reliance on sub optimal routes through the urban area. The Draft Plan would benefit from clarification regarding whether the strategic allocations are reliant on the delivery of the relief road and if so robust and credible evidence should be provided demonstrating it will be delivered early in the plan period or include appropriate contingency and flexibility. This would help ensure that historic delivery constraints do not	Need for Distributor route for Northern employment sites in Darlington	To be considered in IDP and Section Infrastructure	N	None

LPR071	Employment for Economic Growth	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Section			7. Employment for economic growth	Object	We object to the exclusion of the northern parcel of site ref 500, which is suitable, available and achieveable within the Local Plan Period. See attached submission for site ref 500.	HELAA Site 500 should be residential in Northern Parcel	Allocation Site 343 Faverdale Industrial Estat comprises Helaa Site 500 has been and is a suitable existing Employment Opportunity under policy E1	N	None
LPR085a	Employment for Economic Growth	Matthew Hewitt	Hamilton Willis		Section			7. Employment for Economic Growth	Unknown	See submission. Comments made in relation to the policy approach to Economic Development. Recommends a new policy: Windfall Major Economic Development : New Policy Windfall Major Economic Development Darlington Borough Council recognises the benefit of economic development and as such supports all available opportunities for sustainable, well-designed and suitable employment generating development. Economic development will be supported where it can be demonstrated that: a) The development proposal is identified as critical national infrastructure; or b) The development proposal directly contributes to meeting the number of jobs to be created within Darlington; or c) The economic benefits of the development proposal would be substantial and has been evidenced. To benefit from support from this policy, any development proposals must: i) demonstrate how the location of the development proposal cannot be met on any allocated sites for the same use that have not been delivered or where sites exist that could accommodate the development that reasonable efforts have been made to explore the opportunity of delivery such sites; ii)	Suggest new Policy for Windfall Employment which could include permiited development.	Currently not supported witin the NPPF and Local Plan policies in England and Wales	N	None
LPR090b	Employment for Economic Growth	Colin Griffiths	Satnam Group		Policy		Policy E 2 Employment Allocations (Strategic Policy)			2. Mixed Uses. i. The justification for any employment floorspace within site 505, for example as part of a mixed use residential led allocation with a component of employment floorspace, would be reliant upon: a. The Council carrying out a thorough assessment of its need for employment floorspace, and the conclusions of that assessment establishing that there is a need to allocate land for employment purposes beyond those extant allocations identified within the adopted local plan, and b. The Council carrying out a thorough assessment of the land available to it to meet any need identified, and the conclusions of that assessment establishing that some further land is required to be allocated to meet an identified need, and c. If following a site search assessment, land at site 505 is found to be suitable, available, achievable and thus deliverable for employment use, and d. If following the undertaking of a viability assessment of the Skerningham Garden Village strategic site, it is established that provision of housing led mixed use housing and employment development on site 505 could generate sufficient surplus value to fund the provision of onsite infrastructure and make the required contribution to offsite infrastructure.	Further evidence is needed for new employment site 505 in Local Plan	Evidence for Site 505 within the HELAA and will be supported by Employment Need evidence paper	Yes	Evidence paper for Employment land need will be created for Reg 19
LPR102g	Employment for Economic Growth	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy		E1 - Safeguarding Existing Employment Opportunities (Strategic Policy)		Neutral	It is noted that the table (7.2) of existing employment sites has seen the inclusion of Darlington Auction Farmers Mart, which is 78.11 hectares in size. This was previously allocated individually under policy E3 in the current Local Plan, which supports “ancillary and related uses for economic purposes for rural economic development”. However, its inclusion under policy E1 would suggest that the whole site can now be considered for general B2, B8 and E (a, b, c and g) uses, and as such, represents an additional major employment allocation, at the same time as deallocating Ingenium Parc.	Land Uses in Darlington Auction Mart Site have been widened	Further need to define areas of Land use within the Site could be necessary at planning Application stage	N	None or division of site into smaller parcels of Land Use eligibility

LPR102h	Employment for Economic Growth	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy		E2 - Employment Allocations (Strategic Policy)		Object	As discussed in our response to policy H1, the draft Local Plan Review proposes to deallocate the current employment allocation at Ingenium Parc (Site 356), which would see the removal of approximately 41 hectares (gross) of employment land. As set out in our representations to policy H2, Ingenium Parc is currently allocated for employment use (Site 356 – Ingenium Parc), forming part of a wider employment allocation and adjoining Cummins, which is a major Darlington employer. There is no supporting evidence that is available to view, that would support the deallocation of the employment land. Neither is there any consideration of how the proposed housing allocation would affect existing major employment use and the retained employment allocation. As the same time, the draft supporting text to policy E2 also states that three employment sites have been identified through the Housing Employment Land Availability Assessment (HELAA 2025) of being able to cater for additional employment opportunities. There are East Street, Burtree Employment Park, and Skerningham Garden Village Employment site. However, the draft Local Plan review, or available evidence base, does not set out how this approach is justified, the rationale, or wider impacts on other objectives (e.g. housing delivery). We are concerned with how the approach fits with the overall aims and objective of the Local Plan. As an example, it is proposed to include Burtree Employment Park as a new employment allocation. The Council's HELAA 2025 includes a brief assessment of the site, which is 35.57 hectares in site, and notes that the site is located outside the development limits.	Deallocation of Site 356 without evidence and effect of residential on Existing Employment Sites General lack of evidence for new allocaltion of new sites	Allocation of new sites will be supported by Employment Need evidence paper	Yes	Evidence paper for Employment land need will be created for Reg 19
LPR104o	Employment for Economic Growth	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621230	Section			7. Employment for Economic Growth	Unknown	Employment Land Needs 15.1 Taylor Wimpey supports the Council's ambition to promote employment growth within the borough. However, there is concern that the scale of proposed housing delivery does not adequately support this level of economic ambition. In addition, there appears to be no up-to-date assessment of employment needs to demonstrate that the spatial strategy is underpinned by a robust and proportionate evidence base. In the absence of such alignment between housing provision and employment growth, the approach risks being inconsistent with the 2024 National Planning Policy Framework's requirement to plan positively for sustainable economic growth. Justification 15.2 The Council's approach to employment needs is not underpinned by an up-to-date assessment of employment requirements. Instead, the methodology broadly carries forward employment assumptions from the adopted Local Plan, reflecting only changes to the plan period. As a consequence, the approach continues to rely on evidence dating from 2017 and 2020. Since that time, there have been significant structural changes in economic conditions, including the impacts of Brexit, the COVID-19 pandemic and the conflict in Ukraine. In this context, a refreshed and proportionate evidence base is required to ensure that the policy approach is justified in accordance with the 2024 National Planning Policy Framework. 15.3 Furthermore, the proposed reduction in the housing requirement has resulted in a decoupling of housing provision from the Council's stated employment ambitions. This imbalance between housing and employment supply risks constraining labour market capacity and suppressing economic growth. As such, the approach cannot be	Provide economic Growth justification and evidence to align housing and economic growth	Allocation of new sites will be supported by Employment Need evidence paper for growth in the additional period	Yes	Evidence paper for Employment land need tp 2042 will be created for Reg 19
LPR105o	Employment for Economic Growth	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621232	Section			7. Employment for economic growth	Neutral	Taylor Wimpey supports the Council's ambition to promote employment growth within the borough. However, there is concern that the scale of proposed housing delivery does not adequately support this level of economic ambition. In addition, there appears to be no up-to-date assessment of employment needs to demonstrate that the spatial strategy is underpinned by a robust and proportionate evidence base. In the absence of such alignment between housing provision and employment growth, the approach risks being inconsistent with the 2024 National Planning Policy Framework's requirement to plan positively for sustainable economic growth. The Council's approach to employment needs is not underpinned by an up-to-date assessment of employment requirements. Instead, the methodology broadly carries forward employment assumptions from the adopted Local Plan, reflecting only changes to the plan period. As a consequence, the approach continues to rely on evidence dating from 2017 and 2020. Since that time, there have been significant structural changes in economic conditions, including the impacts of Brexit, the COVID-19 pandemic and the conflict in Ukraine. In this context, a refreshed and proportionate evidence base is required to ensure that the policy approach is justified in accordance with the 2024 National Planning Policy Framework. 15.3 Furthermore, the proposed reduction in the housing requirement has resulted in a decoupling of housing provision from the Council's stated employment ambitions. This imbalance between housing and employment supply risks constraining labour market capacity and suppressing economic growth. As such, the approach cannot be considered effective or consistent with the Framework's requirement to plan positively for sustainable economic growth.	Provide economic Growth justification and evidence to align housing and economic growth	Allocation of new sites will be supported by Employment Need evidence paper for growth in the additioanl period	yes	Evidence paper for Employment land need tp 2042 will be created for Reg 19

LPR107f	Employment for Economic Growth	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Policy		E1 - Safeguarding Existing Employment Land (strategic)		Neutral	In relation to the Central Park Allocation (site reference 368) Cityheart supports the allocation of this land but would suggest that the allocation be broadened to support the delivery of uses falling within Use Class F1 (Learning and non-residential institutions). It is suggested that the table be amended, as set out below: 368 Central Park South 9.84 ha 5.24 ha 3.67ha B2 , E(g) & F1	F1 inclusion of Site 368	Sensible addition as Horizon Centre and Stem centre would fall under that category	Yes	Add F1 Land use
LPR107g	Employment for Economic Growth	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Policy		E2 - Employment Allocations (strategic)		Neutral	With respect to East Street (Site Ref 474), Cityheart support the inclusion of this policy into the plan. However, as a site contained within the town centre, it is suggested that the suggested use be broadened into all uses falling within Use Class E. There should also be an acknowledgement that the site may be suitable to accommodate a Multi-Storey Car Park (MSCP), which are typically classified as sui generis. We would suggest additional wording in the Appendix relation to site 474 as follows: East Street is a 1.25 hectare strategic Town Centre employment site adjoining Crown Street Library, the River Skerne, St Cuthberts Way and Priestgate. It is a key regeneration area in Darlington with high potential for office-led, mixed-use development, including commercial and other town centre uses, reflecting its sustainable location and regeneration role opposite the Darlington Economic Campus at Brunswick Street which is currently under construction It is suggested that the appendix for site 474- East Street criterion (a) be reworded as follows: Providing suitable plots for Office development E(g) and other appropriate Class E and town centre uses.	East Street 474 suggestions	Some of the wording suggested wording is suitable	Yes	Agree suggeted text in Appendix and add to all uses of Class E
LPR108d	Employment for Economic Growth	Chris smith	Skerningham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1RF 0191 2615685	Policy		E2 - Employment Allocations (strategic)		Support	Further to our client's comments on Policy H10, the inclusion of Site 505 for approximately 22 hectares of employment space at Skerningham Garden Village is supported. Policy H10 (h) makes clear that this site includes land to the east of the River Skerne, and Site 505 is also identified on the Policies Map. However, for completeness, there should be more clarity in the Site Name within Policy E2 to identify the area of Skerningham Garden Village to which the policy relates. The Site Name for 505 should be amended from "Skerningham Garden Village Employment" to "Land North of A1150 and east of the River Skerne, Skerningham Garden Village".	Site name could be confusing	Not an issue	N	None
LPR113 & 114m	Employment for Economic Growth	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		E1 – Safeguarding Existing Employment Land (strategic)		Neutral	Bellway note from the Draft Plan policies map that the two strategic employment locations allocated within the Draft Plan are located to the north west and east of the settlement edge of Darlington. At present, there is no direct connection between these two locations, with the majority of traffic movements routed through or south of Darlington town. The delivery of the Darlington Relief Road will change movement patterns by providing a direct strategic connection between the two sites and a new link between the A66 and the A1(M) to the north of Darlington. This infrastructure improves accessibility and establishes a clear spatial framework for future growth. Housing growth along the Relief Road corridor should therefore be regarded as a critical component of the Plan's spatial strategy ensuring residential growth is closely aligned with strategic infrastructure investment. Bellway note that this approach has been partially embedded through the retention of the Northern Strategic Housing Location and the Garden Villages to the east and west; however, Bellway do not believe the full growth potential of this corridor has been accommodated for within the Draft Plan. 3.16.4 Bellway believe DBC must not underestimate the significance of the Relief Road as a catalyst for growth in northern Darlington, or its long-term implications for economic growth, job opportunities and investment. The delivery of strategic transport infrastructure of this scale demands a comparable ambitious level of housing growth to fully maximise its benefits. DBC should therefore adopt a bold and proactive approach by expanding housing allocations along the Relief Road corridor, including at Burtree Lane and High Beaumont Hill. This would help ensure that historic delivery constraints do not	Need for Distributor route for Northern employment sites in Darlington	To be considered in IDP and Section Infrastructure	N	None

LPR116i	Employment for Economic Growth	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		E2 - Employment Allocations (strategic)		Object	Our Client is the freehold owner of approximately 63 hectares of land at Bishopton Lane ('the Site'), located immediately north of the A1150/A66. A Site Location Plan showing our Client's land interests is submitted alongside these representations at Appendix 1 for completeness. The adopted Darlington Local Plan (2022) allocates our Client's land for housing development as part of the wider Skerningham Garden Village Allocation within Policies H2 and H 10. The Allocation, comprising 429.19 hectares of land, is identified to deliver up to 4,500 dwellings within Policy H2, with approximately 1,650 dwellings to be delivered during the current plan period up to 2036. Policy H2 is entitled "Housing Allocations (Strategic Policy)" and the accompanying Local Plan Policies Map confirms that the Site forms part of the area of land allocated by Policy H2 to provide up to 4,500 houses. Our Client previously submitted representations to the Council's 2025 Call for Sites consultation, to promote the Site for residential land uses as part of the wider Skerningham Allocation. As set out within those representations, the Site in question is suitable, available and achievable, with a live outline planning application (Ref. 25/01408/OUTE) for a new residential neighbourhood of up to 850 dwellings including C2 (Residential Institutions) and C3 (Dwelling houses) uses, open space, means of access, supporting infrastructure and associated works currently pending determination at the time of writing. Despite the existing allocation of our Client's land for residential land uses and a subsequent planning application duly submitted to deliver that objective of the Development Plan, as well as representations confirming the Site's continued suitability, availability and achievability	Allocation should be residentail only	Garden Village should have an employment element and plans have been adapted	No	None
LPR118	Employment for Economic Growth	Dominic Waugh	The Darlington Farmers Auction Mart Company Ltd	Dominic Waugh, Pegasus Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne NE1 6AE	Policy /Site	Site 393	E1 – Safeguarding Existing Employment Land (strategic)		Support	To summarise, DFAM Company Ltd support the content of Policy E 1 of the Draft Local Plan Review. The land at DFAM remains available for the suggested uses contained in Policy E 1 and DFAM Company Ltd consider that allocating land at Humbleton Farm provides an appropriate location for a range of employment / commercial uses in a suitable location close to Junction 58 of the A1(M). See accompanying submission for details.	Support of further uses at Humbleton Farm	Support noted.	N	None
LPR120g	Employment for Economic Growth	Councillor Bryony Holroyd			Section			7. Employment for economic growth	Neutral	Brownfield sites a.We welcome the allocation of some brownfield sites such as Kendrew Street, which is little-used as a car park, and should be a great regeneration opportunity. b.many brownfield sites are not allocated for development, when they should be e.g. part of Whessoe Rd Corus / Rolling Mills site (the part not allocated for biodiversity offsetting), a site in Garden Street - there are many more. We don't believe that the council is doing enough work with landowners to bring these sites forwards for development, or seek brownfield funding to get them redeveloped - these should be seen as flagship "opportunity sites" to regenerate an area. Office / business development site at East Street behind the Library. c.Other existing buildings / sites may be relevant for redevelopment as change of use from employment to residential (Large building opposite Friends Meetinghouse on Skinnergate, upper floors of Binns - only IF such aspects appear in the Local Plan) d.Wilco's & multi-storey car park would be good for mixed-use, including residential.	More Brownfield sites should be used for employment purposes	Most larger sites are covered others have devlopment rights from other policies such as Town Centre or E1	N	None
LPR122	Employment for Economic Growth	ELG Planning for La	Gateway House, 55 Consicliffe Road, Darlington, DL3 7EH		Policy		E2 - Employment Allocations (strategic)		Object	These comments have been prepared by ELG Planning on behalf of our client in response to Darlington Council's regulation 18 consultation. The National Planning Policy Framework (NPPF) requires that policies in local plans and spatial development strategies are reviewed to assess whether they need updating at least once every five years and then should be undated as necessary. These reviews need: •Changing circumstances affecting the area; or •Any relevant changes in national policy. The NPPF goes on to say that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. The National Planning Practice Guidance (NPPG) also sets out what authorities consider when determining whether a plan or policies within a plan should be updated. The NPPG also notes that a Local Planning Authority (LPA) may need to gather new evidence to inform their review. Proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies. This Local Plan consultation follows a Cabinet Report that was presented to the Council's Cabinet in March 2026. The report includes a "summary of the benefits of this early review of the Local Plan". The benefits/reasons of the Local Plan Review are listed as being: a)Most policies remain up to date and therefore have not needed to be revisited or have only needed minor updates. b)Evidence base updates only need to reflect reviewed policy areas.	Land at Holdforth Grange should be included as E2	Site at Holdworth Grange not suitable and enough employmement land is available for this review	N	None
LPR127, 128 & 129ai	Employment for Economic Growth	Ros Kain	Historic England		Site	Site 360 Heighington Lane North			Neutral	Existing allocation. No Heritage Impact.	No impact	No issue	N	None
LPR127, 128 & 129aii	Employment for Economic Growth	Ros Kain	Historic England		Site	Site 362 Teesside International Airport South			Neutral	Existing allocation. No Heritage Impact.	No impact	No issue	N	None

LPR127, 128 & 129aiii	Employment for Economic Growth	Ros Kain	Historic England		Site	Site 433 Burtree Lane Employment Park			Neutral	See Appendix B of submission. This 37.57 hectare strategic employment site is proposed close to junction 68 on the A1(M) and the A68. It is divided in two by Burtree Lane. Although this site is not in close proximity to any designated heritage assets it should subject to HIA screening. Suggested change - DBC should consider whether an HIA is required. The Historic Environment and Site Allocations in Local Plans - link provided for The Historic Environment and Site Allocations in Local Plans - see submission.	Need for HIA for Burtree Employment Park	Will be dealt with in any future planning applications	N	None
LPR127, 128 & 129aiv	Employment for Economic Growth	Ros Kain	Historic England		Site	Site 474 East Street			Neutral	See appendix of submission. A 1.25 hectare strategic Town Centre employment site adjoining Crown Street Library, the River Skerne, St Cuthberts Way and Priestgate. It is described as a key regeneration area with high potential for office development. Albeit this site is partly developed, it falls within the direct setting of several designated heritage assets. Including on Crown Street the listed Library & Post Office and the Bridge over the Skerne on Russell Street. The site adjoins and is in the setting of the Town Centre Conservation Area. It may also fall within the wider setting of the Grade I listed Church. A detailed HIA is required. This should also consider archaeological potential. A HIA is required * The Historic Environment and Site Allocations in Local Plans - weblink, see submission. Assess whether the site has potential archaeological interest.	HIA required for East Street	Will be dealt with in any future planning applications	N	None
LPR040	Employment for Economic Growth	E Parsons	E Parsons & V Parsons c/o InvestAcc Pension Trustees Limited as Trustees of the Parson SSAS Pension Scheme	Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 03301373507 andrew.moss@wardadaway.com	Policy		E4 – Economic Development in Open Countryside (strategic)		Object	The policy states that proposals for the sustainable growth and expansion of all types of businesses located in the open countryside will be supported where a number of criteria are met. The Respondents consider that the policy should allow for the establishment of new businesses not connected with existing businesses on / adjacent to the site. Otherwise the Respondents consider the policy approach is too restrictive. Criterion D) i requires that the proposal is connected to or adjacent to the primary agricultural holding or existing rural business. The Respondents consider this is unduly onerous, does not reflect NPPF paras 88 – 89, and suggest the criterion is deleted. Criterion D) ii requires that the proposal is economically related to the primary agricultural holding or existing rural business and is ancillary to the primary existing use. The Respondents consider this is unduly onerous, does not reflect NPPF paras 88 – 89, and suggest the criterion is deleted.	Criterion D of policy E4 to onerous	Criterion D is justified to be upheld	N	None
LPR085e	Employment for Economic Growth	Matthew Hewitt	Hamilton Willis		Section				Object	Site representation for Morton Palms Farm. Details and plans submitted.	Morton Palms Farm should be included partly in E2	Not suitable as per Helaa and would grow Dralington and MSG together	N	None	
LPR123d	Employment for Economic Growth	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		Employment Policy – Burtree Garden Village – Policy E2	Clarifications and additional text – Policy E2	object	HLL/HE are supportive of Burtree Garden Village land being retained and identified within the employment policy as part of a mixed use allocation and as per the currently adopted plan. The comments on this policy and the changes requested to the table within it, reflect those made of relevance within allocation H11. The most accurate and relevant figure is the gross 19.4 ha figure, with a 13ha net figure no longer reflecting anticipated delivery. The supporting text for this policy should clarify that the net figures are assumptions within the local plan evidence base and delivery of a higher net figure, within the parameters of the gross figure, on allocated sites would not be contrary to Policy E2. As stated in relation to H11, there is currently no clarification or instructions within this policy for landowners considering alternative uses on residual employment land which, later in the plan period, may not remain deliverable for employment. An additional sentence should be added to the text in policy E2 which states that: "Where alternative uses are proposed on employment land which do not meet the definition or characteristics of employment, these uses will be permitted where it is demonstrated that there is no reasonable prospect of the site coming forward for employment purposes, that the proposed use would meet unmet needs within the borough and be compatible with any existing and established employment uses within the associated allocation". The references to there being "no reasonable prospect" for an allocated use and a proposal to address "unmet needs" aligns with NPPF which ultimately forms part of the forthcoming test of a sound plan.	Gross size of Employment land is to small and should be 19.4ha	If the size is demonstrable as 19.4 ha changes willbe made	Yes	Amendment in table and policy text if needed net stays at 70% of 19.4ha	

LPR123h		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		Burtree Employment Park (Policy E2)		Neutral	HLL/HE note the inclusion of a further 37.57 hectares of B2/B8/E(g) employment space at Burtree Employment Park to the north west of the H11 allocation on the western boundary of the A1(M). Whilst HLL/HE do not object in principle to the inclusion of additional employment land, it places further emphasis on the wider points stated in response to H11, E2 and IN1. In short, the potential for a new employment site immediately adjacent to Burtree Garden Village could impact on the scale and location of employment associated with H11. This places emphasis on the flexibility requested within the plan to accommodate change via masterplan updates and the change of use of any residual land where relevant. Furthermore, additional B-class related highways movements associated with uses that require direct access to the A1(M) will further impact on the A1(M) junction within this plan period or the next. The need to demonstrate an understanding of highway impact to 2042 and how the anticipated upgrade of the A1(M) junction relates to this time period, and other allocated sites will ensure the plan is justified and effective. General policy comments A summary of residual comments and suggestions on general development management matters are set out below.	Burtree Lane Employment Park has impact on Burtree Garden Village Employment Land	Burtree GV Employment land has been significantly reduced (75ha to 19,4ha) and part of Burtree lane Employment land mitigates loss of overall Borough offer on employment land allocation.	No	None
LRP123j		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		Burtree Employment Park (Policy E2)	Critical support infrastructure - Data centre site criteria - Policy E2	Neutral	The supporting text for policy E2 at paragraph 7.1.8 outlines a range of opportunities for growth potential in Darlington. This is in addition to Darlington's Economic Campus and Central Park developments and the range of government departments relocating to Darlington. With a growing focus on investment in the Tees Valley and the identified need for 94 hectares of employment land (as stated in 7.1.16) the NPPG has made it clear that plans should not only plan for traditional employment land, but also ensure the economy is strengthened via modern support infrastructure, making reference in paragraph 86 for the identification of criteria and key strategic sites for inward investment, including the needs of a modern economy such as gigafactories and data centres and other digital infrastructure. The nature of employment development on larger sites such as Burtree Garden Village remains under consideration and will ultimately respond to demand within the market. Nonetheless, the plan is currently silent on the site characteristics and parameters that would be expected should modern forms of B-class employment present opportunities in the Borough. Some additional work and clarification on high level parameters for an acceptable development proposal within a sub section of policy EN2 may assist in encouraging investment in the Borough whilst also ensuring the plan is compliant with national planning policies. Such characteristics may typically comprise employment sites with sufficient space to accommodate the design requirements and adequate access to a power supply.	Other Uses for Employment Land should be considered such as giga factories and datacentres	Darlington will be supportive of new industries and sectors and will accomodate those / Those indutsries though have no Use Class at the moment	No	None
LPR120h	Employment and Economic Growth	Green Party			Section			Appendix B	Neutral	9.Employment land allocations a.Concern at employment land allocation close to the new Auction Mart - a currently unsustainable location, due to being entirely car-dependent, unconnected to active and public transport, for both goods and employees. New employment land allocations must be close to these to be sustainable, and public transport services must be of a usable frequency (every 20 minutes). b.For new employment sites, travel plans must be generated, and escrow payment to Modeshift (or equivalent org.) to ensure the travel plan mode shift requirements are delivered. For too many sites, travel plans are written then never implemented. c.Standards for employment sites must be improved, with a requirement to consider improved insulation, renewables, battery storage, green roofs, rainwater catchment.	Auction Mart Site currently unconnected to Public transport and Car dependent New sites need travel plans and enhanced environmental standards	Application for employment on newly allocated emplyment site need to outline Modal Shift propsals from car and include at any stage a Travel Plan. Environmental standards and renewables use would be a key decision criteria for planning committee.	No	None
LPR107j	Town Centre and Retail	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Site	474. East Street			Neutral	With respect to East Street (Site Ref 474), Cityheart support the inclusion of this policy into the plan. However, as a site contained within the town centre, it is suggested that the suggested use be broadened into all uses falling within Use Class E. There should also be an acknowledgement that the site may be suitable to accommodate a Multi-Storey Car Park (MSCP), which are typically classified as sui generis. We would suggest additional wording in the Appendix relation to site 474 as follows: East Street is a 1.25 hectare strategic Town Centre employment site adjoining Crown Street Library, the River Skerne, St Cuthberts Way and Priestgate. It is a key regeneration area in Darlington with high potential for office-led, mixed-use development, including commercial and other town centre uses, reflecting its sustainable location and regeneration role opposite the Darlington Economic Campus at Brunswick Street which is currently under construction It is suggested that the appendix for site 474- East Street criterion (a) be reworded as follows: Providing suitable plots for Office development E(g) and other appropriate Class E and town centre uses.	Other Town Centre Uses should be included	Uses can be broadened as Town Centre are also applicable for the site	Yes	Rewording Appendix 1 Site 474 as suggested

LPR reference (starting at LPR021)	Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Site Details	Policy Details	Section Details	Object /Support/ Neutral	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LPR107e	Town Centre and Retail	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469 236, jeremy@elgplanning.co.uk	Policy		TC3 - Additional sites for town centre uses		Neutral	It is suggested that this policy needs re-drafting to acknowledge the role that a residential led scheme can play in the regeneration of the town centre. As has been demonstrated since the original allocation, the site is unlikely to be brought forward as a retail led scheme with retail floorspace generally contracting in Darlington as with many towns across the country. The policy should be reworded to acknowledge the key role that a residential led scheme can deliver to support the vitality and viability of the existing town centre and deliver the regeneration sought for this important site.	Redrafting of Policy to include potential roles of residential led schemes for Town Centre	Residential led schemes for this site under the policy are not ruled out but could be included and strengthened based on wavering Retail demand.	Yes	Residential Led schemes could be considered under T3
LPR127, 128 & 129h	Town Centre and Retail	Ros Kain	Historic England		Policy		TC6 - Darlington Town Centre Fringe		Support	We support reference to the Northgate Urban Design & Masterplan Framework but ask that the status of the document is included. Further detail should be added about future projects (see 1.8.4 above). Suggested change - Expand as suggested.	Status of Document Northgate Urban Design and Masterplan Framework should be added	Status is explained	No	None
LPR044i	Town Centre and Retail	Vanessa			Policy		TC6 – Darlington – Town Centre Fringe		Object	I welcome the allocation of some brownfield sites for development (Kendrew St.) But, many which should be allocated, are not. I don't think the council are doing enough to bring these sites forward for regeneration: Rolling Mills, Garden St. Other sites could be redeveloped positively via change of use: Skinnergate opp. Friends Meeting House, Binns upper floors - if this is allocated in the Local Plan. Wilkinsons & multi-storey car park could be a great mix-es use site inc. residential.	Other brownfield sites mentioned are not allocated in the Local Plan	Those sites are outsie TC 6 boundary	No	None

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Sec	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LPR021	Environment	Mr Martin Swainston			Section		9. Environment	Object	The environment section does nothing to improve the environment, in reality the increased building and building on green fields will harm the boroughs limited countryside	Objection to the environment section. Concerned does nothing to improve the environment, in reality the increased building and building on green fields will harm the boroughs limited countryside	The environment section sets out a range of policies seeking to protect and enhance environmental assets in the Borough consistent with national policy.	No	None
LPR026/027g	Environment	David Barton	Community Campaigner, Civic Heritage, InYouArea Ambassador for Southport		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	9. Environment	Neutral	See sections 2,3,5,6,7,8 of PDF response covering Designated and Non-Designated heritage assets, Conservation Areas, Historic Buildings, Traditional Vernacular Architecture, Making an Application and Miscelleanous	A range of detailed suggestions are made around the consideration of different heritage assets	Opinions noted	No	None
LPR034	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	Safeguarding the Historic Environment - Paragraph 9.1.6	Recommen	The Friends recommend a change to the text; '....modern railways and parts of the original 26 miles are the longest continually operating.....'	Minor wording change proposed to paragraph 9.1.6 to ensure accuracy	Proposed amendment noted and made	Yes	Amend sentence to read "It is now regarded as the prototype for all modern railways and parts of the original 26 miles are the longest continually operating modern railway in the world".
LPR034a	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	C Archaeological Sites	Support	The Friends support the inclusion of the 1825 S&DR Main Line and Darlington Branch as an Area of High Archaeological Potential as defined in Appendix C.	Support the inclusion of the 1825 S&DR Main Line and Darlington Branch as an Area of High Archaeological Potential as defined in Appendix C.	Support noted	No	None
LPR034b	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	D Non-Designated Heritage Assets	Recommen	The Friends recommend adding 'and landscaping' at the end.	Minor wording addition	Proposed amendment noted	Yes	Amend sentence to read "Proposals should seek to avoid harm to those features, including setting, which contribute to the significance of a non-designated heritage asset, through measures such as good design and landscaping".
LPR034c	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	Securing Optimum Viable Use (might be Assesment of Heritage Significance) - Paragraph 9.1.28		Even so, developers must demonstrate that that their proposals have been designed to minimise harm as much as possible, and include appropriate compensating landscaping and boundary treatment.	Provides further clarity on the measures.	Comments noted	No	None
LPR034d	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	Assesment of Heritage Significance - Paragraph 9.1.29		This says the Council will create a Local List but Appendix C contradicts this, saying that Non-Designated Heritage Assets will be added to the Historic Environment Record. Although the Appendix gives guidance on assessing such assets, the issue is how to ensure that the many S&DR assets already identified in the various assessments, studies and other published reports can be included in the HER if they are not already included. Unless included, owners, applicants and planning officers may be unaware of their importance.	Contradictory reference to preperation of Local List compared to Appendix C. Need to ensure many already identified S&DR assets are included on the HER.	Comments regarding identified railway assets passed to Conservation Officer. Amendment proposed to paragraph 9.1.28 to remove reference to preparation of Local List to match appendix C.	Yes	Deletion of reference to Local Listing.
LPR034e	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	Assesment of Heritage Significance - Paragraph 9.1.30	Support	The Friends welcome the advice to applicants to discuss the scope of Heritage Impact Assessments with planning officers in advance. The Friends have an extensive resource of research and appraisal of S&DR heritage. We work closely with the Council's conservation officer and are in the process of preparing a Conservation Management Plan for the S&DR asset. The Council requests the Friends' advice on certain planning applications after they have been validated; in some cases it may be more effective for the Friends to advise prospective applicants at this earlier stage in the process.	Suggestion that the Friends of S & D Railway can offer advice to prospective applicants early in the preperation of proposals.	Offer of support and advice earlier in the application process noted and will be passed to Conservation Officer and DM team.	No	None
LPR034f	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	Assesment of Heritage Significance - Paragraph 9.1.31	Support	The Friends fully support these requirements. Too often applicants have either been unaware of or choose to ignore the importance of S&DR assets affected by their proposals.	Supports requirements set out.	Support noted	No	None
LPR046	Environment	Ben Westwood	Durham Archaeology Section		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	9. Environment	Neutral	9.1.32 – not clear what the National Archive means here, and thus may require clarification. Do you mean the Historic England Archive - https://historicengland.org.uk/images-books/archive/	Clarity on National Archive meaning	Amend to Historic England archive	Yes	Amend to Historic England archive
LPR046c	Environment	Ben Westwood	Durham Archaeology Section		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment	9. Environment	Neutral	9.1.4 – refers to 'Heritage Environment Record' – it should be the 'Historic Environment Record'	Reference incorrect	Agree reference needs to be amended	Yes	Amend reference in paragraph 9.1.4 from Heritage Environment Record to "Historic Environment Record".
LPR095f	Environment	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment (strategic)	9. Environment	Neutral	Section D) Non-Designated Heritage Assets of draft Policy ENV1 has been amended to allow for a more balanced judgement in regard to the direct or indirect impact on non-designated heritage assets, considering any harm/loss and their significance as a heritage asset. We support this alteration, as there are non-designated heritage assets within the area defined as Site 468, including buildings within our client's land holdings. This alteration should provide flexibility in the judgement of any proposal impacting a non-designated heritage asset within the planning balance.	Support amendment to policy wording on non-designated heritage assets	Support noted	No	None

LPR097c	Environment	Irene Ord	Resident		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment (strategic)	9. Environment	Object	Overview: A fully trained DBC Planning Officer should be able to use and support national guidance effectively if they are called on to advise Directors and Council. They must justly enable the optimal viable use and public protection of all DBC's GII Listed Buildings, whether or not they are directly, indirectly impacted by new planning schemes. Speculative developers and their agents should not take advantage from the apparent lack of well-informed heritage asset scrutineers. There is currently a Council refusal to enforce mitigating planning conditions (legally binding controls) that could make weak plans barely acceptable & barely sustainable for adversely impacted neighbouring parties. The foreseeable consequences of past complex cases may effectively spoil the future use of neighbouring buildings, and blight vulnerable national or locally listed assets that may be forced to stand by. This is untenable. Suitably qualified (locally knowledgeable) expert analysis and assessment of potential harm at the outset of each case is absolutely necessary to protect and identify the most vulnerable historic/environmental public assets. Developers should actively avoid undermining/ irreversibly altering settings that may inform better understanding of related assets that a by-standing related asset holder does not own. If unevidenced recordings are blindly found to be acceptable by DBC then greater public harm may be caused. No one profits from this - it is corporate cultural theft. DBC despite its aims since the 1970's has few robust Local Records that can be relied on. It must be publicly seen that full evaluations are being done by fully trained public officers who fully understand the subtleties of Historic England Guidance and Heritage Law. National and local inherited built and environmental assets are in part publicly owned and increasingly vulnerable to this (now dormitory) town's expansion far beyond the town centre fringe, where the facades of buildings appear to be slightly better protected, though a good deal of hollowing out and re-partitioning may be done inside. Protection and conservation of an assets significance by recording it for posterity should offer the public	Concerns raised with the implementation of the policy in the Development Management process, lack of Conservation Resources in the application process and difficulty in accessing records.	Comments noted.	No	None
LPR098b	Environment	Angela and Michael	Parkland Heritage Network (Blackwell)		Policy	Policy ENV 1 Protecting, Enhancing and Promoting Darlington's Historic Environment: (Strategic Policy)	9. Environment	Support	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. See attached documents	Support for the referenced part of the policy in relation to proposals affecting listed buildings	Support noted	No	None
LPR099b	Environment	Angela and Michael	Darlington & Teesdale Naturalists Field Club		Policy	Policy ENV 1 Protecting, Enhancing and Promoting Darlington's Historic Environment: (Strategic Policy)	9. Environment	Support	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. See attached documents	Support for the referenced part of the policy in relation to proposals affecting listed buildings	Support noted	No	None
LPR100b	Environment	Angela and Michael	Darlington Friends of the Earth		Policy	Policy ENV 1 Protecting, Enhancing and Promoting Darlington's Historic Environment: (Strategic Policy)	9. Environment	Support	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. See attached documents	Support for the referenced part of the policy in relation to proposals affecting listed buildings	Support noted	No	None
LPR101b	Environment	Angela and Michael	The Open Spaces Society		Policy	Policy ENV 1 Protecting, Enhancing and Promoting Darlington's Historic Environment: (Strategic Policy)	9. Environment	Support	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. See attached documents	Support for the referenced part of the policy in relation to proposals affecting listed buildings	Support noted	No	None
LPR127, 128 & 129i	Environment	Ros Kain	Historic England		Policy	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment (strategic)	9. Environment	Support	We support the retention of the Policy ENV1. We have no comments to make of the slight amendments to the policy or the supporting text 9.1.1 - 9.1.32 other than 9.1.6 and 9.1.7 below. - see submission.	General support for policy and supporting text and slight amendments.	Support noted	No	None
LPR127, 128 & 129j	Environment	Ros Kain	Historic England		Section	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment (strategic)	9. Environment	Support	Para 9.1.6 - Supporting text. We support the amendments to this paragraph and that the S&DR is of international significance. However, this should be emphasised in other sections of the LP.	Support recognition of S&DR international significance but this should be emphasised elsewhere in the plan.	Suggestion noted and further reference made in the overview section 1.2.2 and objective 4a	Yes	Reference to S&DR in the overview section and the internationally significant railway heritage in objective 4a.
LPR127, 128 & 129k	Environment	Ros Kain	Historic England		Section	ENV1 - Protecting, Enhancing and Promoting Darlington's Historic Environment (strategic)	9. Environment	Neutral	Para 9.1.17 - Supporting text. This paragraph refers to a Heritage Impact Assessment that assesses the suitability of several allocation sites from an historic environment perspective with design and mitigation measures recommended and included in Appendix B – Allocations Statements and strategic policies for Skerningham Garden Village and Burtree Garden Village. HIAs do not form part of the Evidence Base for the new allocations. The Local Plan Review cannot rely on the 2019 HIA where new sites are proposed allocations. See Appendix B for our comments on the proposed allocations and which require Heritage Impact Assessments.	The Local Plan Review cannot rely on the 2019 HIA where new sites are proposed allocations. Detailed comments provided on the sites requiring HIA's or updates.	Comments noted and it is proposed to update and undertake additional or updates to Heritage Impact Assessments as required.	Yes	Further evidence base work required
LPR034g	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Policy	ENV2 - The Stockton & Darlington Railway		Support	The Friends support the proposed changes to the policy but recommend an addition, either in the Policy or the accompanying text, that where development causing harm can be approved for reasons of significantly outweighing public benefit, measures have been taken to reduce the harm as much as possible by careful design and landscaping.	Additional wording suggested where proposals causing harm are proposed.	Reference is made within Policy ENV1 back to Policy ENV1 where this is set out. So an amendment is not considered necessary to avoid duplication.	No	None
LPR034i	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV2 - The Stockton & Darlington Railway	Protecting, enhancing and promating the Stockton and Darlington Railway - Paragraph 9.2.5		The website https://sdr-trail-of-discovery.co.uk/home describes those parts of the route that have been established to date.	Provided link describing parts of the route currently established.	Comments noted and additions proposed	Yes	Additional text to reference link and set out what established to date
LPR127, 128 & 129l	Environment	Ros Kain	Historic England		Policy	ENV2 - Stockton and Darlington Railway Strategic Policy		Neutral	Wording in brackets to be removed. We support the retention of the Policy but ask for the following alteration. d. retain and enhance access to, and alongside the route, branch lines, remains, structures, features and their setting and (support) require the creation of a walking and cycling path(s) along it's the route. (will be encouraged). Suggested change - Amend to ensure public access to the S&DR route is delivered via the relevant site allocations.	Support retention of policy but suggested wording amendments to part d regarding the walking and cycling route.	Comments noted and amendments proposed	Yes	Amend part d wording from 'support' to 'enable'

LPR127, 128 & 129m	Environment	Ros Kain	Historic England		Policy	ENV2 - Stockton and Darlington Railway Strategic Policy		Neutral	Para 9.2.2. - 9.2.4 Supporting Text. Refer to submitted covering letter and Appendix A site allocations.	Further reference to the heritage action zone projects cou	Comments noted and additional wording added to paragraph 9.2.5	Yes	Add in the following to para 9.2.3 - "The project has also resulted in an improved sense of place and identity with several assets associated with the Stockton and Darlington Railway removed from the national heritage at risk register. Site-specific regeneration has delivered new uses for historic buildings and boosted the visitor economy around Hopetown".
LPR127, 128 & 129n	Environment	Ros Kain	Historic England		Policy	ENV2 - Stockton and Darlington Railway Strategic Policy	Para 9.2.5	Neutral	The text should be more specific to require delivery of the S&DR walking and cycling route. Suggested change (remove text in brackets) - Amend as follows: Following the success of the S&DR bicentenary celebrations, (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, will (opening up) be actively promoted as a site requirement for new developments along the route. (for leisure and tourist visits, and as an education resource will be)	Suggested changes to text to be more specific requiring the delivery of the S&DR walking and cycling route.	Comments noted and amendments proposed	Yes	Amend para 9.2.5 as proposed. Following the success of the S&DR bicentenary celebrations, (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, will (opening up) be actively promoted as a site requirement for new developments along the route. (for leisure and tourist visits, and as an education resource will be)
123e		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	ENV2 - Stockton and Darlington Railway			HLL/HE note that the route of the Stockton and Darlington Railway has masterplanning implication for the delivery of Policy H11 via the requirement for approved pedestrian access and interpretation. This has been reflected in the approved masterplan through the delivery of a landscaped area on the eastern boundary of the site. This area could potentially accommodate an aspirational pedestrian and cycle route, should it become possible to connect to third party infrastructure on adjoining land. Policy requirements for an identified connection to Harrowgate Hill have been met previously via enhancements to the Faverdale Black Path and therefore it is necessary to ensure clear separation between the two requirements. In meeting the general requirement for approved pedestrian access and interpretation in H11, policy ENV2 is also engaged which makes reference to a need to conserve and enhance elements which contribute toward the significance, preservation and enhancement of physical remains of the railway. It also seeks provision of access to remains, railway structures and features and their setting. Whilst HLL/HE have already sought to accommodate these objectives in masterplanning, once it is necessary to provide detailed designs on this route, some of the policy requirements are subjective and could be open to interpretation. Where it is not possible to address all requirements due to constraints or other design reasons, the railway remains a non-designated heritage asset, whereby a simple balance test of harm vs wider benefit is applicable as set out in ENV1 and the NPPF. The addition of requirements to conserve and enhance the asset, within a dedicated policy is more suited to a designated heritage asset. To ensure the positive policy objectives are interpreted in context and notwithstanding the cross reference to EN1, it should be re-iterated within ENV2 and/or its supporting text that where the aspirational design objectives cannot be met by a development proposal the scale of any residual harm, taking into account design mitigation will be considered via balanced judgement against the benefits of the associated proposal.	notwithstanding the cross reference to ENV1, it should be re-iterated within ENV2 and/or its supporting text that where the aspirational design objectives cannot be met by a development proposal the scale of any residual harm, taking into account design mitigation will be considered via balanced judgement against the benefits of the associated proposal.	Comments noted additional wording not considered necessary to avoid duplication of ENV1 and clear cross reference will ensure proposals considered in the context of their designation.	No	N/a
LPR032a	Environment	Richard Cowen	CPRE Durham		Policy	ENV3 – Local Landscape Character (strategic)		Support	Protecting the landscape is clearly very important for CPRE and so we support the principle of this Policy. It is particularly important that all villages, including Service Villages, should retain their character and not coalesce with other urban areas. We believe that this is consistent with our representations relating to Policies SD2 and H1.	Support for policy to protect landscape and highlights the importance of villages retaining their character and avoiding coalescence.	Support noted	No	N/A
LPR034j	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Policy	ENV3 - Local Landscape Character	Part B2	Recommen	The historic route of the Darlington/Middleton St George/A66/A67/ Stockton Corridor appears as the route of the S&DR on the Policies Maps and the Friends recommend that it be described as such.	Suggest changing reference to historic route to the S&DR.	Comment noted and amendment proposed.	Yes	Amend historic route name to S&DR
LPR034k	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV3 - Local Landscape Character	Local Landscape Character - Paragraph 9.3.5	Recommen	The Friends recommend that the text should read 'Stockton & Darlington Railway' Should the policy reference here be to ENV4?	Suggest amending S&DR Reference to ensure correct. Amend policy reference from ENV7 to ENV4.	Comment noted and amendment proposed.	Yes	Amend from Darlington and Stockton Railway to Stockton and Darlington Railway. Amend policy reference from ENV7 to ENV4.
LPR052o	Environment	Louise Tait	Environment Agency		Policy	ENV3 - Local Landscape Character		Neutral	We acknowledge that natural features such as hedgerows, field margins, and wetlands are habitat types that are all listed as Habitats of Principal Importance under the NERC Act (2006). It should be emphasized with the policy or its supporting paragraphs that natural features should be retained and the loss or damage of such habitats must be addressed in-line with the mitigation hierarchy. We advise inserting the word 'watercourses' into criteria A2 iii and B2 ii.	Include reference to watercourses.	Comment noted and amendment proposed.	Yes	Add "watercourses" to A2iii and B2ii. Part D add in after 'traditional natural and built features' "including ancient and semi-natural woodland, trees, hedgerows and watercourses".
LPR087d	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV3 - Local Landscape Character (strategic policy)		Object	It is recognised that draft Policy ENV 3 includes some variation from the adopted Policy ENV 3 in the DBLP. While our Client broadly supports the intentions of the policy, and recognises that development should be considerate of the local landscape character, there are some instances within the draft Policy where the wording has potential to conflict with other aims and objectives of the Plan. These are taken in turn, below. Under Part (A), criteria 1. suggests that the openness and green infrastructure functions of the rural gap between Darlington and the villages of Great Burdon and Barmpton should be retained. We would reiterate the point made at paragraph 2.5 of this report, regarding the gap between the site allocation, which we consider could extend up to and adjoin the Rural Gap policy extent. The Council has also proposed to add text to criteria (i) of draft Policy ENV 3, whereby within areas identified at Parts 1. and 2., development should maintain physical separation of settlements and urban areas. At this stage, our Client wishes to remind the Council that one of the principal objectives of both the adopted DBLP and draft Local Plan Review document is to ensure the Darlington Urban Area remains the focus of future development. In this context, our Client's allocated site, as well as a considerable number of other residential allocations shown on the adopted DBLP policies map are located within the settlement limits of Darlington, and near or adjacent to areas identified at Parts 1. and 2. Our Client therefore questions whether the wording of Policy ENV 3, in the absence of a mechanism for additional flexibility, has the potential to preclude the delivery of allocated sites. Accordingly, our Client respectfully requests that the Council reconsiders the wording of criterion (i) to ensure that it does not conflict with other policies within the Local Plan Review, or inadvertently prevent the delivery of allocated residential development. Criterion (ii) of Policy ENV 3 is retained from the adopted DBLP and requires development to enhance biodiversity by promoting protected and priority habitats and species. In principle, our Client agrees that development should seek to protect and enhance biodiversity; however, this should be undertaken in accordance with the Environment Act 2021 (as amended) and other relevant national policy and guidance. The Council adopted the DBLP prior to the introduction of a suite of Biodiversity Net Gain ("BNG") Regulations in February 2024, which subsequently introduced the BNG Hierarchy at Part 7A of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as	Concerns with additional wording in part A i will prejudice the delivery of site allocations. Part A ii is no longer consistent with Biodiversity requirements in the Environment Act.	Part A criteria 1 - The additional wording reiterates the purpose of the rural gaps in relation to openness and ensuring existing settlements remain physically seperate and distinct settlements rather than being absorbed within the main urban area. Clarity will be provided that this relates to rural gaps only. Site 020 is adjacent to but not within the Great Burdon rural gap so it wouldn't preclude this site allocation being brought forward but assists in ensuring the rural gap retains its openness and Great Burdon retains its local distinctiveness and physical separation from the urban area and the site allocation. Other allocations including rural gap within them were originally allocated on the basis that no development would take place in these areas which would conflict with ENV3. Criteria A ii. is not related to biodiversity net gain it is regarding protecting and enhancing sites of biodiversity value consistent with paragraph 187a of the NPPF. Amended wording is proposed to make this clearer. Criteria A iii. This relates to development proposals within areas that are identified as rural gaps and green corridors and is effectively criteria for development in exceptional circumstances. The traditional landscape features are a key aspect of their character and local distinctiveness therefore development which would result in the removal of these would not be acceptable. All of these criteria apply to designated areas so higher levels of	Yes	Include wording to make clear that 'maintain the physical seperation of settlements and urban areas' relates to rural gaps. Remove 'traditional' from Aiii
LPR098a	Environment	Angela and Michael	Parkland Heritage Network (Blackwell)		Policy	ENV3 - Local Landscape Character		Support	ENV 5 makes reference to the Darlington Open Space Strategy 2007–2017, which was last updated in 2010. Natural England advises that your Authority undertakes a new Open Space Needs Assessment to inform an updated Open Space Strategy. This would ensure that evidence on open space provision is current and that Policy ENV 5 remains effective and robust	Support for the areas protected by the policy but suggests there are areas in the urban area where landscape or townscape quality can be improved.	Support noted. Part F of Policy ENV3 does recognise there are areas of low landscape quality in the Borough and seeks high quality design to strengthen local character and distinctiveness in these locations.	No	N/A
LPR099a	Environment	Angela and Michael	Darlington & Teesdale Naturalists Field Club		Policy	ENV3 - Local Landscape Character		Support	Local Landscape Character The National Planning Policy Framework (NPPF) indicates that valued landscapes should be protected and enhanced. The Darlington Local Plan protects and seeks to appropriately enhance the distinctive character of the Borough's natural and historic townscapes and landscapes, including unique features like rural gaps, green wedges, green corridors, historic routes and Parklands. However, there are some parts of the inner urban area where landscape or townscape quality could be improved, in particular to better promote Darlington's railway heritage (Policy ENV 2). See attached documents.	Support for the areas protected by the policy but suggests there are areas in the urban area where landscape or townscape quality can be improved.	Support noted. Part F of Policy ENV3 does recognise there are areas of low landscape quality in the Borough and seeks high quality design to strengthen local character and distinctiveness in these locations.	No	N/A

LPR100a	Environment	Angela and Michael	Darlington Friends of the Earth		Section	ENV3 - Local Landscape Character		Support	Local Landscape Character The National Planning Policy Framework (NPPF) indicates that valued landscapes should be protected and enhanced. The Darlington Local Plan protects and seeks to appropriately enhance the distinctive character of the Borough's natural and historic townscapes and landscapes, including unique features like rural gaps, green wedges, green corridors, historic routes and Parklands. However, there are some parts of the inner urban area where landscape or townscape quality could be improved, in particular to better promote Darlington's railway heritage (Policy ENV 2). See attached documents.	Support for the areas protected by the policy but suggests there are areas in the urban area where landscape or townscape quality can be improved.	Support noted. Part F of Policy ENV3 does recognise there are areas of low landscape quality in the Borough and seeks high quality design to strengthen local character and distinctiveness in these locations.	No	N/A
LPR101a	Environment	Angela and Michael	The Open Spaces Society		Section	ENV3 - Local Landscape Character		Support	Local Landscape Character The National Planning Policy Framework (NPPF) indicates that valued landscapes should be protected and enhanced. The Darlington Local Plan protects and seeks to appropriately enhance the distinctive character of the Borough's natural and historic townscapes and landscapes, including unique features like rural gaps, green wedges, green corridors, historic routes and Parklands. However, there are some parts of the inner urban area where landscape or townscape quality could be improved, in particular to better promote Darlington's railway heritage (Policy ENV 2). See attached documents.	Support for the areas protected by the policy but suggests there are areas in the urban area where landscape or townscape quality can be improved.	Support noted. Part F of Policy ENV3 does recognise there are areas of low landscape quality in the Borough and seeks high quality design to strengthen local character and distinctiveness in these locations.	No	N/A
LPR098c	Environment	Angela and Michael	Parkland Heritage Network (Blackwell)		Policy	Policy ENV 3 Local Landscape Character (Strategic Policy)		Support	A) Retaining the openness and green infrastructure functions of: 1. 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; and 2. The green wedges of Cocker Beck/Mowden, Blackwell/Skerne Park and Haughton/Red Hall. C) Retaining and improving the special landscape, heritage and ecological qualities of urban and rural parklands at South Park, North Lodge Park, West Cemetery, Blackwell Grange, Rockcliffe Park, Middleton Hall, Walworth Castle, Redworth Hall, Hall Garth, Newbus Grange and Neasham Hall.	Support for the identification of green wedges and urban parkland at Blackwell Grange.	Support noted	No	None
LPR099c	Environment	Angela and Michael	Darlington & Teesdale Naturalists Field Club		Policy	Policy ENV 3 Local Landscape Character (Strategic Policy)		Support	A) Retaining the openness and green infrastructure functions of: 1. 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; and 2. The green wedges of Cocker Beck/Mowden, Blackwell/Skerne Park and Haughton/Red Hall. C) Retaining and improving the special landscape, heritage and ecological qualities of urban and rural parklands at South Park, North Lodge Park, West Cemetery, Blackwell Grange, Rockcliffe Park, Middleton Hall, Walworth Castle, Redworth Hall, Hall Garth, Newbus Grange and Neasham Hall.	Support for the identification of green wedges and urban parkland at Blackwell Grange.	Support noted	No	None
LPR100c	Environment	Angela and Michael	Darlington Friends of the Earth		Policy	Policy ENV 3 Local Landscape Character (Strategic Policy)		Support	A) Retaining the openness and green infrastructure functions of: 1. 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; and 2. The green wedges of Cocker Beck/Mowden, Blackwell/Skerne Park and Haughton/Red Hall. C) Retaining and improving the special landscape, heritage and ecological qualities of urban and rural parklands at South Park, North Lodge Park, West Cemetery, Blackwell Grange, Rockcliffe Park, Middleton Hall, Walworth Castle, Redworth Hall, Hall Garth, Newbus Grange and Neasham Hall.	Support for the identification of green wedges and urban parkland at Blackwell Grange.	Support noted	No	None
LPR101c	Environment	Angela and Michael	The Open Spaces Society		Policy	Policy ENV 3 Local Landscape Character (Strategic Policy)		Support	A) Retaining the openness and green infrastructure functions of: 1. 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; and 2. The green wedges of Cocker Beck/Mowden, Blackwell/Skerne Park and Haughton/Red Hall. C) Retaining and improving the special landscape, heritage and ecological qualities of urban and rural parklands at South Park, North Lodge Park, West Cemetery, Blackwell Grange, Rockcliffe Park, Middleton Hall, Walworth Castle, Redworth Hall, Hall Garth, Newbus Grange and Neasham Hall.	Support for the identification of green wedges and urban parkland at Blackwell Grange.	Support noted	No	None
LPR111&112h	Environment	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	ENV3 - Local Landscape Character (strategic)		Object	It is recognised that Draft Policy ENV 3 includes some variation from the adopted Policy ENV 3 in the DBLP. While our Client broadly supports the intentions of the policy and recognises that development should be considerate of the local landscape character, there are some instances within the Draft Policy where the wording has potential to conflict with other aims and objectives of the Plan. These are taken in turn, below. The Council proposes to insert text within criteria (i) of Draft Policy ENV 3, whereby within areas identified at Parts 1 and 2 of the policy, development will only be permitted where it "maintains the physical separation of settlements and urban areas". Part 2 of Draft Policy ENV 3 includes reference to Green Wedges. Similarly, the Council also proposed to introduced criterion (iii) under Draft Policy ENV 3 which states that development will only be permitted where it "conserves and enhances traditional landscape features including ancient and semi-natural woodland, trees and hedgerows". Firstly, it is important to recognise that the Hall Farm Site Allocation is located immediately adjacent to the Cocker Beck/Mowden Green Wedge. The Site Allocation Statement in Appendix B of the Local Plan and Local Plan Review (Regulation 18) documents requires the delivery of a north-south 'distributor road' through the Site. This requires a connection to the Site from Staindrop Road south of the Site, crossing through the Green Wedge. Therefore, the principle of development crossing through the Green Wedge, and the resulting effects upon the landscape character of the Green Wedge by association, has already been established as being acceptable through the allocation of the Hall Farm Site in the adopted Local Plan. Proposed revisions to Criterion (i) and the inclusion of Criterion (iii) should not preclude the delivery of the access road from Staindrop Road, otherwise this would prejudice the ability of any future application to comply with the Site Allocation Statement in Appendix B of the plan, and thus could stymy the delivery of the Site to the detriment of the Council's housing trajectory and subsequent land supply. Whilst we acknowledge that a Development Plan should be read as a whole, our Client would request that the Council reconsiders the proposed wording to be inserted within Draft Policy ENV 3 in this respect, to avoid any unintended policy conflicts stymying the delivery of the Hall Farm Site Allocation (and to avoid similar constraints on other allocations throughout the Plan). Taking Criterion (iii) in further detail, there is no definition provided in the Local Plan Review or	Concerns with additional wording in part A i and iii will prejudice the delivery of site allocations as access required through green wedge. Concerns with the use of the word traditional with lack of definition.	Part A criteria 1 - The additional wording reiterates the purpose of the rural gaps in relation to ensuring existing settlements remain physically seperate and distinct settlements rather than being absorbed within the main urban area. Clarity is porposed to be added to make clear this addition relates to rural gaps only. Site 100 and other allocations including rural gap within them were originally allocated on the basis that no development would take place in these areas which would conflict with ENV3. Criteria A ii. is not related to biodiversity net gain it is regarding protecting and enhancing sites of biodiversity value consistent with paragraph 187a of the NPPF. Amended wording is proposed to make this clearer. Criteria A iii. This relates to development proposals within areas that are identified as rural gaps and green corridors and is effectively criteria for development in exceptional circumstances. The traditional landscape features are a key aspect of their character and local distinctiveness therefore development which would result in the removal of these would not be acceptable. All of these criteria apply to designated areas so higher levels of protection are afforded compared to undesignated areas.	Yes	Include wording to make clear that 'maintain the physical seperation of settlements and urban areas' relates to rural gaps. Remove 'traditional' from Aiii

LPR115c	Environment	Emma Williams	Church Commisioners for England - Deloitte	Emma Williams, Deloitte,	Policy	ENV3 - Local Landscape Character (strategic)		Object	The Commissioners support the intention of draft Policy ENV 3 to ensure that development proposals take consideration of local landscape character. However, the Commissioners have concerns regarding the proposed wording within Draft Policy ENV3, particularly Criterion (i) and (iii), which could unintentionally hinder the delivery of allocated sites. Criterion (i) – Physical separation of settlements The proposed text within Criterion (i) stating that that development will only be permitted where it "maintains the physical separation of settlements and urban areas," raises concerns. The Hall Farm site, as an allocated urban extension, requires the delivery of a north-south distributor road, which necessitates crossing a Green Wedge. The principle of development crossing this Green Wedge, and its associated effects on landscape character, has already been established and deemed acceptable through the site's allocation in the adopted Local Plan. The current wording of Criterion (i) could therefore prejudice the delivery of essential infrastructure for allocated sites, contrary to the need for effective and justified policies as set out in NPPF Paragraph 36. The Commissioners urge the Council to reconsider this wording to ensure it does not create unintended policy conflicts that hinder the delivery of allocated sites. The Commissioners suggest the following wording could be added to the proposed policy wording: "…unless it can be demonstrated that development is justified and appropriately mitigated to preserve the overall landscape character and setting." Criterion (iii) – Conservation of Traditional Landscape Features	Concerns with additional wording in part A i and iii will prejudice the delivery of site allocations as access required through green wedge. Concerns with the use of the word traditional with lack of definition.	Part A criteria 1 - The additional wording reiterates the purpose of the rural gaps in relation to ensuring existing settlements remain physically seperate and distinct settlements rather than being absorbed within the main urban area. Clarity is porposed to be added to make clear this addition relates to rural gaps only. Site 100 and other allocations including rural gap within them were originally allocated on the basis that no development would take place in these areas which would conflict with ENV3. Criteria A ii. is not related to biodiversity net gain it is regarding protecting and enhancing sites of biodiversity value consistent with paragraph 187a of the NPPF. Amended wording is proposed to make this clearer. Criteria A iii. This relates to development proposals within areas that are identified as rural gaps and green corridors and is effectively criteria for development in exceptional circumstances. The traditional landscape features are a key aspect of their character and local distinctiveness therefore development which would result in the removal of these would not be acceptable. All of these criteria apply to designated areas so higher levels of protection are afforded compared to undesignated areas.	Yes	Include wording to make clear that 'maintain the physical seperation of settlements and urban areas' relates to rural gaps. Remove 'traditional' from Aiii
LPR123l		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	Burtree Employment Park (Policy E2)	ENV3 - Landscape		HLL/HE do not object to the updated policy which includes new references to the need to "enhance" the landscape and greater consideration of the Darlington Borough Landscape Assessment. The policy however does need to clarify that where some landscape change and harm is identified, which is often unavoidable for strategic allocated development, that a balanced consideration of the type and magnitude of harm will take place against the benefits of a development proposal. This should be added as a closing sentence to policy ENV3, this would better align with NPPF paragraph 189 of the NPPF which reserves the test of conservation and enhancement to National Parks and National Landscapes which have a higher status of protection. As a suggested addition to the end of the policy as a closing sentence for context: "Where the nature of a development proposal results in some residual harm to landscape having taken into account any possible mitigation, a balanced view will be taken considering the benefits of development in that location, weighed against the nature of the harm to the landscape".	Need to clarify that where some landscape change and harm is identified, which is often unavoidable for strategic allocated development, that a balanced consideration of the type and magnitude of harm will take place against the benefits of a development proposal. As a suggested addition to the end of the policy as a closing sentence for context: "Where the nature of a development proposal results in some residual harm to landscape having taken into account any possible mitigation, a balanced view will be taken considering the benefits of development in that location, weighed against the nature of the harm to the landscape".	Comments noted. Amendment proposed	Yes	Add 'commensurate with its status' to part D.
LPR029e	Environment	David Phillips	Butterfly Conservation North East		Policy	ENV4 - Green & Blue Infrastructure		Support	9.4.9 Complementary network of smaller spaces provide for informal recreation (e.g. walking, jogging) close to homes and work is welcome in this document which may ease the pressure on Local Nature Reserves. Perhaps this could be extended to create designated dog walking facilities within the borough to again ease the pressure on Local Nature Reserves.	Supports provision of smaller spaces for informal recreation. Encourages this to be expanded to include dog walking facilities.	Support noted. Specific reference could be added to dog walking although this would be covered by the broader reference to informal recreation.	No	None
LPR037	Environment	William Ward	The Woodland Trust		Policy	ENV4 - Green and Blue Infrastructure (strategic)		Support	The Woodland Trust welcomes the inclusion of policies relating to green and blue infrastructure within the Local Plan. These two policies are an important component of delivering sustainable development and demonstrate a clear commitment to enhancing biodiversity, managing flood risk, and improving the health and wellbeing of residents. In particular, the indication that development proposals resulting in the loss of existing green space will be refused is a strong and commendable position, which provides important protection for valued community assets. To strengthen this policy further, it would be beneficial to explicitly require that trees form a core component of green spaces within new developments. Trees are critical to the functionality and value of green infrastructure, providing shade, carbon sequestration, habitat connectivity, and improvements to air quality. In addition, the policy could be enhanced by introducing a minimum tree canopy cover target for all new green spaces. Setting clear, measurable expectations would help ensure that green infrastructure delivers meaningful environmental benefits and contributes to wider canopy cover goals across the borough.	Support for inclusion of ENV4 & ENV5. Suggest policy could be strengthened further by explicitly requiring trees to form a core component of GI within new development. Recommend introducing a minimum tree canopy cover target for all new green spaces.	Support noted. A addition is proposed to ENV5 paragraph 2 to explicitly reference tree planting as part of green infrastructure provision.	Yes	Green Infrastructure provision should incorporate tree planting where appropriate.
LPR052p	Environment	Louise Tait	Environment Agency		Policy	ENV4 - Green and blue infrastructure		Neutral	Proposals will be supported where opportunities to improve fish passage and watercourse connectivity are explored. This would include the removal/modification of barriers and de-culverting watercourses, where possible. Opportunities to improve habitat for fish and re-naturalisation of watercourses would also be welcomed as a further consideration for this policy. Policy ENV4 could be strengthened by the following additions and deletions (additions in bold and deletions shown as strikethrough text): '…Green and blue infrastructure will be protected, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multi-functional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity…'. d. Expecting development to protect and improve local water quality, wherever possible, taking into account the Northumbria River Basin Management Plan;' e. 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. In respect of criterion e. we recommend considering referring to wider relevant plans such as the Tees Valley Local Nature Recovery Strategy. We recommend Paragraph 9.4.11 (supporting text to Policy ENV4) mentions that development should not adversely affect water-dependant water bodies or groundwater abstractions.	Policy should look to provide reference to improving habitat for fish and re-naturalisation of watercourses. Part d relating to water quality could be strengthened with the addition of protect. Criterion e should reference the LNRS. Para 9.4.11 should refer to water-dependant water bodies or groundwater abstractions.	Comments noted and amendments proposed.	Yes	Add new critierion - Development proposals affecting a watercourse should maintain a 10m buffer zone and explore opportunities to re-naturalise, improve fish habitat and watercourse connectivity including the removal and/or modification of barriers and de-culverting, where possible. Criterion d - Add in 'protect' to state 'protect and improve' Criterion e - add in reference to the Tees Valley LNRS. Para 9.4.11 - include reference to 'development should not adversely affect water-dependant water bodies or groundwater abstractions.
LPR098	Environment	Angela and Michael	Parkland Heritage Network (Blackwell)		Policy	Policy ENV 4 Green and Blue Infrastructure (Strategic Policy)		Support	Green and blue infrastructure will be protected, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multi-functional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity. See attached documents.	Support for policy and particularly reference to green wedges and designated wildlife sites	Support noted	No	None
LPR099	Environment	Angela and Michael	Darlington & Teesdale Naturalists Field Club		Policy	Policy ENV 4 Green and Blue Infrastructure (Strategic Policy)		Support	Green and blue infrastructure will be protected, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multi-functional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity. See attached documents.	Support for policy and particularly reference to green wedges and designated wildlife sites	Support noted	No	None
LPR100	Environment	Angela and Michael	Darlington Friends of the Earth		Policy	Policy ENV 4 Green and Blue Infrastructure (Strategic Policy)		Support	Green and blue infrastructure will be protected, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multi-functional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity. See attached documents.	Support for policy and particularly reference to green wedges and designated wildlife sites	Support noted	No	None
LPR101	Environment	Angela and Michael	The Open Spaces Society		Policy	Policy ENV 4 Green and Blue Infrastructure (Strategic Policy)		Support	Green and blue infrastructure will be protected, and where appropriate, improved and extended to provide a quality, safe and accessible network of well connected, multi-functional open spaces for recreation and play and to enhance visual amenity, biodiversity, landscape and productivity. See attached documents.	Support for policy and particularly reference to green wedges and designated wildlife sites	Support noted	No	None

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LPR125&126g	Environment	Josh White	Natural England		Policy	ENV4 - Green and Blue Infrastructure		Neutral	Green and Blue Infrastructure is well integrated throughout the plan and Natural England welcomes Policy ENV 4 (Green and Blue Infrastructure). We believe that there is scope to further develop this policy using the Natural England Green Infrastructure Framework and associated Standards. The Framework and Standards are intended to define what good Green and Blue Infrastructure looks like. We recommend that Policy ENV 4 is further developed to reflect the five headline Green Infrastructure Standards, adapting them to the local context. They are summarised as: 1.Green Infrastructure Strategy Standard – Local Authorities produce a GI Strategy and Delivery Plan, and major developments provide a Green Infrastructure Plan including accounting for long-term management and maintenance of GI features. 2.Accessible Greenspace Standards (AGS) – everyone has access to good quality greenspace close to home with a focus on access to greenspace within 15 minutes' walk, local authorities have at least 3ha per 1000 population of publicly accessible quality greenspace with no net loss or reduction in capacity, and set standards for provision on major developments. 3.Urban Nature Recovery Standard – Local Authorities increase the number and quality of Local Nature Reserves and Local Wildlife Sites, and major developments show how they contribute to nature recovery. 4.Urban Greening Factor – Local Authorities target at least 40% average green cover in urban residential neighbourhoods with no net loss in green cover in urban neighbourhoods, and utilise the National Urban Greening Factor for major developments. Local Authorities can adapt this Natural England standard if locally appropriate and we are seeing a number of Local Authorities utilising it as a pre and post development assessment tool to ensure no net loss in greening. 5.Urban Tree Canopy Cover – Tree canopy cover is increased by an agreed percentage with major developments designed to meet these targets, and new and existing trees incorporated into new developments. Additionally, Policy ENV 4 typically focuses on Green Infrastructure. There is scope to develop the Blue Infrastructure	Policy can be further developed using Natural England Green Infrastructure Framework and associated standards. Should reflect five headline standards adapting to local context. 1. Green Infrastructure Strategy Standard. 2. Accessible Greenspace Standards. 3. Urban Nature Recovery Standard. 4. Urban Greening Factor and 5. Urban Tree Canopy Cover Target	Reference has now been included in the policy to the green infrastructure principles in the GI framework and requires proposals to demonstrate how they will achieve these. Standards have now being included in the policy - the Fields in Trust ones which will require a higher amount of provision than the 3 hectares in the AGSt. Other standards are still being considered as the Council updates its Green Infrastructure Strategy. A tree canopy cover requirement is included in ENV10.	Yes	Numerous amendments made to policy ENV5 to reference Natural England GI standards and include Fields in Trust Standards.
LPR125&126n	Environment	Josh White	Natural England		Section	ENV4 - Green and Blue Infrastructure	Health Inequalities and Social and Cultural Barriers to Nature	Neutral	Although health inequalities are well evidenced across the Plan and Sustainability Appraisal, there is scope to further strengthen the Plan by explicitly linking health inequality data with LNRS and Green Infrastructure mapping, to support more targeted delivery of nature based interventions in areas of greatest need. We also draw your attention to Identifying Social and Cultural Barriers to Nature - NECR561 which identifies several key issues that act as barriers to equality of access to nature in five localities of Birmingham and may provide your Authority with useful insight.	Health inequalities are well evidenced across the Plan and Sustainability Appraisal, there is scope to further strengthen the Plan by explicitly linking health inequality data with LNRS and Green Infrastructure mapping, to support more targeted delivery of nature based interventions in areas of greatest need.	Comments noted and this is something that will be addressed through the update to the Council's Green Infrastructure Strategy.	No	
LPR087e	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV5 - Green Infrastructure Standards		Neutral	Our Client acknowledges that the Council has sought to amend the documents referred to within draft Policy ENV 5. However, it is unclear why the Council has chosen to rely on documents, including the 'Green Infrastructure Guidance Note' and 'Darlington Green Infrastructure Strategy and Open Space Assessment', which capture dates between 2013 and 2026. These newly referenced documents do not present an updated position beyond that previously set out in the Planning Obligations SPD and, in any event, are likely to be outdated by the time the Local Plan Review is adopted, anticipated to be no earlier than 2027. Similar concerns arise in relation to the Council's reference to the 'Darlington Design Code'. The Council has not published any supporting evidence alongside the Local Plan Review, and therefore there is no justification for the inclusion or reliance on this document at the present time. Our Client is concerned that referring to documents yet to be produced, or not currently in the public domain is an unsubstantiated precedent that derives uncertainty. It is also unclear if the revised green infrastructure standards and associated costs have been considered in light of development viability, noting reference in Paragraph 6.6.3 to 'forthcoming viability testing' (insinuating no such viability tests have yet been undertaken). Clearly any revised infrastructure standards would need to pass the statutory tests in Regulation 122 of the CIL Regulations (2010). Our Client therefore requests that the Council provides additional evidence in regard to this point, and therefore reserves the right to comment on this matter at a later stage of Local Plan Review consultation.	Concerns with age of evidence and lack of viability testing to support policy.	Amendments proposed to policy to refer to Fields in Trust standards to be used in the interim for calculating green infrastructure requirements until updates to Open Spaces Assessment and Green Infrastructure Strategy have been completed. GI cost incorporated in to viability testing.	Yes	Policy updated to refer to interim standards and clarify approach.
LPR104p	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621231	Policy	Policy ENV5: Green Infrastructure Standards		Unknown	16.1 While Taylor Wimpey supports the principles underpinning the Green Infrastructure standards, there are concerns that the policy is not supported by a sufficiently robust and up-to-date evidence base. Reliance on out-of-date evidence undermines the ability to demonstrate that the policy is justified and effective, contrary to the requirements of the 2024 National Planning Policy Framework. Justification 16.2 Taylor Wimpey considers that the evidence base is neither sufficiently up to date nor robust to support the conclusions reached in this policy. In particular, the evidence does not adequately address whole-plan viability or reflect updated assessments of open space needs. In the absence of such proportionate and current evidence, the policy cannot be demonstrated to be justified, consistent with the requirements of the 2024 National Planning Policy Framework. Proposed Approach 16.3 To address the comments, the following approach is proposed: • Prepare updated evidence to justify approach.	Concerns with age of evidence and lack of viability testing to support policy.	Amendments proposed to policy to refer to Fields in Trust standards to be used in the interim for calculating green infrastructure requirements until updates to Open Spaces Assessment and Green Infrastructure Strategy have been completed. GI cost incorporated in to viability testing.	Yes	Policy updated to refer to interim standards and clarify approach.
LPR105p	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621233	Policy	ENV5 - Green Infrastructure Standards		Neutral	While Taylor Wimpey supports the principles underpinning the Green Infrastructure standards, there are concerns that the policy is not supported by a sufficiently robust and up-to-date evidence base. Reliance on out-of-date evidence undermines the ability to demonstrate that the policy is justified and effective, contrary to the requirements of the 2024 National Planning Policy Framework. Taylor Wimpey considers that the evidence base is neither sufficiently up to date nor robust to support the conclusions reached in this policy. In particular, the evidence does not adequately address whole-plan viability or reflect updated assessments of open space needs. In the absence of such proportionate and current evidence, the policy cannot be demonstrated to be justified, consistent with the requirements of the 2024 National Planning Policy Framework. To address the comments, the following approach is proposed: • Prepare updated evidence to justify approach.	Concerns with age of evidence and lack of viability testing to support policy.	Amendments proposed to policy to refer to Fields in Trust standards to be used in the interim for calculating green infrastructure requirements until updates to Open Spaces Assessment and Green Infrastructure Strategy have been completed. GI cost incorporated in to viability testing.	Yes	Policy updated to refer to interim standards and clarify approach.
LPR111 & 112i	Environment	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	ENV5 - Green Infrastructure Standards		Neutral	Revisions have been proposed to Draft Policy ENV 5, with reference made to a 'Green Infrastructure Guidance Note' in respect of the standards and costs that need to be considered when calculating a development's green infrastructure 'requirements'. Our Client has not had sight of the Green Infrastructure Guidance Note referenced in Draft Policy ENV 5. It is unclear if this document has already been prepared, or whether this document is 'live' and under preparation at the time of writing, to be published alongside future consultations on the Local Plan Review. Without sight of this document, our Client cannot provide informed representations as to the justification and overall soundness of Draft Policy ENV 5, therefore. There is no evidence to confirm how the proposed costs and standards have been derived, and whether the any such costs have been viability tested (noting reference in Paragraph 6.6.3 to 'forthcoming viability testing', it is assumed that no such viability tests have yet been undertaken). Our Client therefore requests that the Council provides additional evidence in regard to this point, and reserves the right to comment on this matter at a later stage of this Local Plan Review process.	Concerns with age of evidence and lack of viability testing to support policy.	Amendments proposed to policy to refer to Fields in Trust standards to be used in the interim for calculating green infrastructure requirements until updates to Open Spaces Assessment and Green Infrastructure Strategy have been completed. GI cost incorporated in to viability testing.	Yes	Policy updated to refer to interim standards and clarify approach.
LPR116e	Environment	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	ENV5 - Green Infrastructure Standards		Neutral	Draft Policy ENV5 makes reference to a 'Green Infrastructure Guidance Note' containing standards and costs for green infrastructure expected to be delivered for developments including 20 dwellings or more. The Guidance Note has not been made available in the public domain by the Council, and so we are unable to comment on the soundness of the proposed infrastructure standards proposed through Draft Policy ENV5 at this time. Our Client reserves the right to comment further at a later stage in the Local Plan Review process, subject to the Guidance Note being made publicly available. It is also unclear if the revised green infrastructure standards and associated costs have been considered in light of development viability, noting reference in Paragraph 6.6.3 to 'forthcoming viability testing' (insinuating no such viability tests have yet been undertaken).	Concerns with age of evidence and lack of viability testing to support policy.	Amendments proposed to policy to refer to Fields in Trust standards to be used in the interim for calculating green infrastructure requirements until updates to Open Spaces Assessment and Green Infrastructure Strategy have been completed. GI cost incorporated in to viability testing.	Yes	Policy updated to refer to interim standards and clarify approach.
LPR125&126h	Environment	Josh White	Natural England		Policy	ENV5 - Green Infrastructure Standards		Neutral	ENV 5 makes reference to the Darlington Open Space Strategy 2007–2017, which was last updated in 2010. Natural England advises that your Authority undertakes a new Open Space Needs Assessment to inform an updated Open Space Strategy. This would ensure that evidence on open space provision is current and that Policy ENV 5 remains effective and robust	Updated Open Space Needs Assessment required to inform new Open Spaces Strategy.	Comment noted it is intended that a Open Spaces Needs Assessment will need to be produced. In the interim it is proposed to include the Fields in Trust Standards to ensure provision is maintained.	Yes	Policy updated to refer to interim standards and clarify approach.

LRP123m		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	ENV 5 – Green Infrastructure Standards			The updated reference to a Green Infrastructure Guidance Note is welcomed by HLL/HE on the basis that the Planning Obligations SPD is out of date, nonetheless some clear and simple guidance on the information to be input into the policy formula in the supporting text for ENV5 would be welcome given the complexity of the information contained within the Planning Obligations SPD. "Darlington's Green Infrastructure Strategy – A Guide to Darlington's Green Infrastructure" is currently available for review but is understood to comprise a baseline study and an alternative document to that referenced in the draft policy as the "Guidance Note"? HLL/HE welcome the ability to comment further based upon a review of further information. The retention of the reference to existing provision in ENV5 is also welcome given the core green infrastructure for Burtree Garden Village is secured via the phase 1 planning consent and will provide for later phases.	Clear and simple guidance on the information to be input in the policy formula would be welcome. Unable to review documents referred to at this time. Welcome reference to retention of existing GI	Comments noted regarding formula and amendments made to policy and supporting text to clarify this including the use of Fields in Trust Standards.	Yes	Policy updated to refer to interim standards and clarify approach.
LPR029f	Environment	David Phillips	Butterfly Conservation North East		Policy	ENV6 - Local Green Spaces		Neutral	Item 9.5.2 & Env 6 & Table 9.1. This Local Plan Review should designate wildlife friendly local Green Space at Barmpton, Skerningham, Hummersknott/Mowden and High Coniscliffe for the purposes of biodiversity, landscape quality and access for existing and new communities.	Should designate wildlife friendly local Green Space at Barmpton, Skerningham, Hummersknott/Mowden and High Coniscliffe for the purposes of biodiversity, landscape quality and access for existing and new communities.	This will be picked up through the update to the Open Spaces Assessment. This could be nominated for consideration as local green space once areas are established.	No	None
LPR029g	Environment	David Phillips	Butterfly Conservation North East		Policy	ENV6 - Local Green Spaces		Neutral	Item Env 6 also 9.5.2 Table 9.1. This Local Plan Review should designate wildlife friendly local Green Space at Barmpton, Skerningham, Hummersknott/Mowden and High Coniscliffe for the purposes of biodiversity, landscape quality and access for existing and new communities.	Should designate wildlife friendly local Green Space at Barmpton, Skerningham, Hummersknott/Mowden and High Coniscliffe for the purposes of biodiversity, landscape quality and access for existing and new communities.	This will be picked up through the update to the Open Spaces Assessment. This could be nominated for consideration as local green space once areas are established.	No	None
LPR032b	Environment	Richard Cowen	CPRE Durham		Policy	ENV6 – Local Green Spaces		Neutral	Clearly, CPRE supports the provision of Local Green Space and we have no objection to the sites which are proposed in this Policy. However, we are concerned that none of the sites put forward by Durham Bird club and which we supported are included. We note paragraph 9.5.6 of the draft Plan which states that no LGS is proposed in areas that are not yet developed. This could be the reason why none of the sites we supported are included but we represent that it is important that this is kept under review as such sites are developed. The provision of additional LGS will be extremely important given the amount of development that is proposed around Darlington.	Support provision of Local Green Space and no objection to sites proposed. Concern that none of sites put forward previously by Durham Bird Club included. Speculate on reasons for exclusion.	Support noted. Site assessment conclusions are published and viewable at https://www.darlington.gov.uk/planning-and-building-regs/planning/planning-and-environmental-policy/local-plan-review/local-green-space-consultation/	No	None
LPR043	Environment	Cllr Jamie Bartch	Darlington Council		Policy	ENV6 - Local Green Spaces	9. Environment	Neutral	Dear Sir/Madam, We write in our capacity as elected members to submit representations to the review of the Darlington Local Plan. We wish to formally request consideration of the following amendments, which we believe are necessary to protect valued green spaces, support community wellbeing, and ensure sustainable development across the borough. Firstly, we propose the removal of the land off Sparrowhall Drive from the Local Plan. This site should instead be designated as protected green space, to be known as "Sparrowhall Green." This designation would preserve an important local amenity, protect biodiversity, and maintain the character of the surrounding residential area. Secondly, we request the inclusion of the Whinfield Community Garden as a designated green space. This site is a well-used and valued community asset, contributing to social cohesion, health, and environmental awareness. Formal recognition within the Local Plan would help secure its long-term future. Finally, we request the introduction of a weight restriction on traffic along Barmpton Lane. The current level of heavy vehicle usage raises concerns regarding road safety, infrastructure impact, and residential amenity. A weight limit would provide a proportionate and necessary safeguard for local residents. We would welcome these proposals being fully considered and incorporated within the Local Plan review. Ensuring the protection of green spaces and addressing transport impacts are key to delivering a balanced and sustainable plan for Darlington. We would be happy to engage further with officers on these matters. Yours faithfully,	Remove Sparrowhall Drive as a housing allocation and identify as Local Green Space named "Sparrowhall Green". Whinfield Community Garden should be identified as a "Local Green Space".	Consultee to be contacted and advised to formally submit proposed Local Green Spaces for assessment.	Possible	Subject to submission and assessment of proposed Local Green Spaces
LPR061	Environment	Councillor Kate Mac	Hummersknott Ward		Policy	ENV6 - Local Green Spaces	9. Environment	Object	With respect specifically to the Green Spaces Designation, I wish to express my deep concern regarding the poor democratic processes and lack of transparency I have encountered. To name several: 1. Though being the councillor representing Hummersknott Ward where the Bullfield is situated, I did not receive the Green Spaces Designation document at the time of issue and a resident informed me it was on the website; 2. Though all councillors were informed of the opening of the Green Space application process they were not, however, informed of its closing date; 3. There has been no advertising for public comments nor any in-person consultation events; 4. Though I have, as Hummersknott councillor, supported the Bullfield Protection group from first being aware of the council's proposal to build on the Bullfield and have spoken on their behalf (eg on January 29 before full council), yet in the Green Spaces Designation Report where a comparison is made between the Bullfield, Tommy Crooks Park and Bellburn Field, my name as supporting councillor for the Bullfield is noticeably omitted, while for the other two green spaces, councillor support is cited. I wish for this to be duly noted and rectified, as it is a glaring omission and undermines the democratic process. 5. Moreover, whilst I have supported the Bullfield Protection group for more than a year, there is no mention of the cross party support it has gained, as demonstrated in council on March 26. Again, this is a serious democratic omission. As writer of the Nature Restoration motion which passed in council last May and which now forms an integral part of the council's Climate Change and Nature Recovery Strategy, I find the council's decision to include the Bullfield in its building/development site allocation in the Local Plan to be a betrayal of the core principles of the motion and subsequent strategy. The Bullfield is a prime, rich natural habitat and wildlife corridor and should be maintained and designated as such by the council. No amount of biodiversity net gain promises or offsetting credits offered could ever replace the value this space currently offers. [See email for final comments.]	Range of detailed concerns over the Greens Spaces designation process and assessment process and conclusions. Lack of acknowledgement of their support as Councillor. Betrayal of the Councils adopted Nature Restoration Action Plan. Bullfield is a prime, rich natural habitat and wildlife corridor and should be maintained and designated as such by the council.	Please refer to our 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)' for further detail on Local Green Space Considerations.	No	
LPR106a	Environment	Andrew Keir	Councillor/Resident		Policy	ENV6 – Local Green Spaces		Neutral	I write in my capacity as a elected members to submit representations to the review of the Darlington Local Plan. I wish to formally request consideration of the following amendments, which we believe are necessary to protect valued green spaces, support community wellbeing, and ensure sustainable development across the borough. Firstly I propose the removal of the land off Sparrowhall Drive from the Local Plan. This site should be designated as protected green space to be known as 'Sparrowhall Green'. This designation would preserve an important local amenity, protect biodiversity, and maintain the character of the surrounding residential area. Secondly, I request the inclusion of Whinfield Community Garden as a designated green space. This site is a well-used and valued community asset, contributing to social cohesion, health, and environmental awareness. Formal recognition within the local plan would secure its long term future. Finally I request the introduction of a weight restriction on the traffic along Barmpton Lane. The current level of heavy vehicle usage raises the concerns regarding road safety, infrastructure impact, and residential amenity. A weight limit would provide a proportionate and necessary safeguard for local residents. I would welcome these proposals being fully considered and incorporated within the local plan review, Ensuring the protection of green spaces and addressing transport impacts ate key to delivering a balanced and sustainable plan for Darlington.	Remove Sparrowhall Drive as a housing allocation and identify as Local Green Space named "Sparrowhall Green". Whinfield Community Garden should be identified as a "Local Green Space".	Consultee to be contacted and advised to formally submit proposed Local Green Spaces for assessment.	Possible	Subject to submission and assessment of proposed Local Green Spaces

LPR124	Environment	Ken Maddison			Policy	ENV6 - Local Green Spaces		Object	Local Green Space Report Summary of Concerns Following the publication of the LGS report in late March 2026 and the closure of the consultation on 28 April 2026 with little publicity and although youapparently have a record that I was sent an E Mail notification of the Local Plan review on 19th March, I can confirm I did not receive that communication, Ihave checked my junk also. Have you any receipt for this e mail? It is more than disappointing to find that the numerous application forms for the Bullfield have been ignored and certainly not responded too with specificreasoning behind the decision or its methodology. I am aware that more applications were sent into the Town Hall than what was identified in the report (43),this on its own is not a successful start to the review, I would like to see the robust registration process for collection and review. The report does not instil any form of confidence in its conclusions and certainly does not give an explanation to the transparent exercise that I would expectthis has been given in its conclusions. I would like to understand more the following :- How was the answers in the boxes derived i.e. 1. Was it an individual – specialist to the subject or a committee 2. Did each answer carry weighting 3. Did a councillor submission carry more importance 4. How many applications came in for TCP and Bellburn 5. Was a sign off process adopted, if so can this be made available. 6. Why did other Cllrs not get a copy of the report before the full council meeting on 26 March 7. Why is the LGS application for sites still open if the report has already been written and gone to Full Councillor 8. What will happen to applications submitted after 26 March I think the list above could go on but I hope you are able to pick up the extreme lack of clear decision making and lack of consistency in this entire processthat feeds directly into the Draft Local Plan. I am aware much focus has been made to the answers in the boxes by many other people demonstrating a lackof consitancy at least, given within the LGS report for many of the sites but just to add to this clearly very poor assessment can I point out the boxes for theSummary and Recommendations. Tommy Crooks	No notification received of the Local Plan review. Numerous LGS application forms relating to the Bullfield ignored or not responded to and no specific reasoning providing for the decision and methodology. Range of detailed points seeking to further understand the conclusions reached. Full review required of the report.	Please refer to our 'Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)' for further detail on Local Green Space Considerations. All people on our consultation database were notified of the Regulation 18 consiltation in line with their communication prefernce.	No	
LPR125&126i	Environment	Josh White	Natural England		Policy	ENV6 - Local Green Spaces		Neutral	Natural England welcomes the protection of designated Local Green Spaces from development under Policy ENV 6. We consider there to be scope to broaden this policy to also protect open spaces that are not designated as Local Green Space. Open space should be protected and enhanced in alignment with Natural England's Accessible Greenspace Standard, with a strategic approach being taken to maintain and improve networks of habitats and green infrastructure. Everyone should have access to good quality green and blue spaces close to home for health and wellbeing and contact with nature, with an initial focus on access to green and blue spaces within 15 minutes' walk from home. We would recommend that local authorities have at least 3 hectares of publicly accessible greenspace per 1,000 population and there is no net loss or reduction in capacity of accessible greenspace per 1,000 population at an area-wide scale.	Supports protection of Local Green Spaces. Policy should also be broadened to protect open spaces in alignment with Natural England standards. Should be at least 3 hectares of publicly accessible greenspace per 1,000 population and not net loss at an area wide scale.	Local Green Spaces are a specific designation that are required to meet specific criteria set by national policy. Policy ENV4 part G protects other types of open space. The Open Space Audit will assess the availability of Accessible Greenspace and amendments are proposed to Policy ENV5.	No	
LPR026/027k	Environment	David Barton - ema	Community Campaigner, Civic Heritage, InYouArea Ambassador for Southport		Policy	ENV7 - Biodiversity and Geodiversity and Development	9 Environment	Neutral	Biodiversity- maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.	Suggest maximising greenery on all arterial routes and dense tree planting and hedgerows where possible along with financial incentives for private property owners.	The Council is proposing to introduce Policy H10 which includes a range of measures to encourage tree and hedgerow planting.	No	None
LPR029h	Environment	David Phillips	Butterfly Conservation North East		Section	ENV7 - Biodiversity and Geodiversity and Development (Strategic Policy)	9. Environment	Neutral	Item 9.6.1 / 9.6.2. This Local Plan Review references 42 nationally and locally designated wildlife sites, providing different levels of protection for a growing range of protected and priority habitats and species. One key species missing is Yellow Wagtail. The Yellow Wagtail is classified as a Red Listed species under the Birds of Conservation Concern 5 category in the UK. This classification means it is at risk of extinction and requires immediate conservation action. This bird continues to breed albeit in small numbers at Skerningham, Barmpton and High Consicliffe within the borough relying on wet meadow and damp grassland. This plan needs to consider how to preserve this habitat and this species from the proposed development in the Skerningham and Barmpton areas 9.6.3. Enhancing or extending existing Local Nature Reserves is a welcome inclusion in this Draft Local Plan. Given the scale of rural-urban edge developments in this plan designating a suitable rural area as a Local Nature Reserve close to Skerningham Garden Village and Burtree Garden Village should be considered a priority. Perhaps brought forward through site development. 9.6.7 & 9.6.12. The inclusion of Dingy Skipper and Holly Blue in the Local Plan is welcome. This Revised Local Plan should not just be limited to these species but should be expanded to include the White-letter Hairstreak butterfly classified as vulnerable and Wall Brown Butterfly classified as endangered under the GB 2025 Red List category. Both are recorded within the borough. White-letter Hairstreak relies on Elm/Wych Elm to complete its life cycle and any new developments should include the planting of such trees to encourage this butterfly to expand. Wall Brown requires open grassland with broken or stony turf, old quarries and railway cuttings with bare surfaces. Given the scale of development within the borough there should be scope to create or enhance green space and maintain unimproved grassland for Wall Brown and other pollinators. 9.6.7, 9.6.12 & 10.5.12. Opportunities to improve the area for pollinators is lacking in this document. Any new distributor or link roads and footpaths should be constructed with low nutrient soil and sown with a native calcareous wildflower seed mix. Removing soil nutrients slows growth rates of vegetation, reduces mowing and management requirements providing financial savings; whilst improving biodiversity by allowing our native wildflowers to germinate and thrive without competition from more vigorous plants. Adopting this approach requires no pesticides and fertilisers and therefore avoids nitrate problems. Our native wildflowers on which insects depend thrive as they are adapted to poorer	Yellow Wagtail a red listed species should be added to the list and measures introduced to preserve its habitat in the Skerningham and Barmpton areas. Suggest identifying LNR's near to Skerningham and Burtree Garden Villages. White-letter hairstreak and Wall Brown Butterfly should also be included with measure to support the required habitat. Opportunities to improve the area for pollinators is lacking in this document. To help support the movement of wildlife, the measures referenced in this plan should be expanded to include community gardens, shrubs, tall grassy areas and Moon Meadows for pollinators particularly in the Coniscliffe and Skerningham areas.	Noted on yellow wagtail and the White-letter Hairstreak and Wall Brown Butterflies. These will be added to the list of species. The Local Plan is not necessarily the approriate place for the other detailed matters raised which can be referenced in an update to the GI Strategy. Refence to pollinator frirendly planting is already included in the policy and reference will also now be added to moon meadows.	Yes	Reference to the White-letter Hairstreak, Wall Brown and Yellow Wagtail now included within 9.6.2 and 9.6.7. Refer to moon meadows in the paragraph within policy on biodiversity enhancement measures
LPR029i	Environment	David Phillips	Butterfly Conservation North East		Section	ENV7 - Biodiversity and Geodiversity and Development (Strategic Policy)	9. Environment	Neutral	9.4.1, 9.4.17, 9.6.10 Env 7-10 Throughout this document there is references to maintaining and managing the environment. Whilst I do not expect this plan to go into specific management details it should be promoting a reduction in use of pesticide and herbicides in public spaces and even stopping them altogether by moving towards eco-friendly maintenance to support biodiversity and the movement of wildlife within the borough. 9.6.1. & 9.6.6, 9.9.10 & ENV7, ENV8 & ENV10. Agreed. Biodiversity Net Gain should be delivered ideally on-site or if not at local nature reserves or elsewhere within the borough before expanding to the wider Tees Valley Local Nature Reserve Strategy area or a neighbouring area. The purchase of biodiversity net credit units as a last resort should not be adopted as there is considerable uncertainty around how and when purchasing such credits could boost biodiversity conservation. 9.6.14, 9.6.15, 9.9.2, ENV 7, ENV 8 & ENV11. This plan includes provision for biodiversity and nutrient neutrality offsetting sites within the borough to help compensate for the impact of developments on biodiversity and nutrients within the borough and in the Teesmouth and Cleveland Coast Special Protection Area and Ramsar site, when provision cannot be made on site in line with policy ENV7 and ENV8. The important of protecting the Teesmouth area is recognised, however, nutrient mitigating measures should be undertaken on site to avoid damaging the local environment e.g. River Skerne. If this is not possible then the development should be refused. The effectiveness of wildlife offsetting is a topic of ongoing debate. Whilst the practice aims to mitigate the impact of development on biodiversity it has faced criticism for its effectiveness. It is very difficult to replicate a complex eco systems and natural habitats but nevertheless remains a measure to improve biodiversity. If an exact match is not feasible will this plan consider an ecological superior outcome and only consider offsetting as a last resort. Off-setting requires a long-term management plan, meaning gains must persist for as long as the development's impact often requiring protection in perpetuity. This plan at least recognises ways forward in which nature does not come last.	Should be promoting a reduction in use of pesticide and herbicides in public spaces and even stopping them altogether by moving towards eco-friendly maintenance to support biodiversity and the movement of wildlife within the borough. The purchase of biodiversity net credit units as a last resort should not be adopted as there is considerable uncertainty around how and when purchasing such credits could boost biodiversity conservation. Nutrient mitigating measures should be undertaken on site to avoid damaging the local environment e.g. River Skerne. If this is not possible then the development should be refused.	Comments noted. Management measures shall be covered in separate Council documents such as the GI strategy. The BNG hierachy is required to accord with existing regulations with includes offsetting through the use of credits. It is not always possible for nutrient mitigation measures to be implemented on-site and whilst certain measure can be employed they are not always appropriate.	No	None required

LPR033	Environment	Richard Cowen	Durham Bird Club		Policy	ENV7 – Biodiversity & Geodiversity & Development (strategic)		Support	The Club fully supports proposals to protect biodiversity. We do make the following specific comments 1) Protected species, including birds, are likely to have specific requirements that they find on a particular site. while noting the requirement for monitoring, this may be too late for the species concerned if it is determined to develop and alternative, compensation site for that species. There is no guarantee that any species will move as hoped, and when it is found that it does not, it is likely to be too late. 2) We fully support the existing River Tees green corridor but are concerned that the word "encourage", which appears twice, may not be strong enough. If a proposal does not address the criteria specified here, will the application be refused? We would prefer the Policy to be along the lines that proposals must address these concerns unless the benefits clearly outweigh the harm 3) Again, we fully support the proposed River Skerne green corridor but again represent that any application should be refused permission if it does not meet the proposed criteria unless the benefits outweigh the harm. In addition, we represent that any green roofs or walls should contain native species. We note the word "encourage" does not appear in relation to the areas mentioned in points C) to F).	Protected species likely to have particular requirements that are found on particular site which not easy to compensate for and may be too late to identify compensation as unsuitable at monitoring stage. General support for the Skerne and Tees green corridors but concern that encourage isn't strong enough.	The point raised around appropriateness of compensation for protected species for birds is addressed by ENV8. The use of 'encourage' applies to all policies a to f in the sentence above. It is proposed to remove encourage from points a and b to match with points c to f but encourage would still apply. Support for Skerne and Tees Green corridors noted.	Yes	A) River Tees Existing Green Corridor - amend to - "Protect and enhance connections between different parts of the ecological network through:
LPR037b	Environment	William Ward	The Woodland Trust		Policy	ENV7 – Biodiversity & Geodiversity & Development (strategic)		Support	The Woodland Trust welcomes this policy. This is an important component in ensuring that development contributes positively to nature recovery and the protection of important habitats. In particular, the reference to the Tees Valley Local Nature Recovery Strategy is strongly supported. Aligning local planning policy with this region-wide framework will help ensure a coordinated, strategic approach to biodiversity enhancement and will help maximise opportunities for habitat connectivity and nature recovery.	Welcome policy and in particular reference to the Tees Valley LNRS	Supported noted	No	None
LPR044h	Environment	Vanessa			Section	ENV7 - Biodiversity and Geodiversity and Development (Strategic Policy)	9. Environment	Object	Stronger protection is needed for hedgerows, ancient & veteran trees, and retaining existing biodiversity (not clearing a site prior to a planning application). Biodiversity Net Gain policies (whilst set by government) must require an audit of at-risk & endangered species, then seek to retain them and improve their habitat (not remove them then provide habitat for different "easier" species.	Stronger protection is needed for hedgerows, ancient & veteran trees, and retaining existing biodiversity (not clearing a site prior to a planning application). Biodiversity Net Gain policies (whilst set by government) must require an audit of at-risk & endangered species, then seek to retain them and improve their habitat (not remove them then provide habitat for different "easier" species.	This policy and policy ENV10 seek to protect ancient and veteran trees and hedgerows consistent with national policy. BNG calculator disincentivises site clearance prior to seeking planning. Biodiversity Net Gain does not remove the requirements set out in Policies ENV7 and ENV8 for sites affecting protected or priority species to follow the hierarchy and only compensate as a last resort. Parts e and f of Policy ENV8 clearly sets out that when compensation is used as a last resort a viable population must be maintained and opportunities for the population to expand where possible.	No	None
LPR052q	Environment	Louise Tait	Environment Agency		Policy	ENV7 - Biodiversity and Geodiversity and Development		Neutral	We advise adding the following text to criterion A) River Tees Existing Green Corridor (i) and criterion B River Skerne Proposed Green Corridor (i): 'Development proposals adjacent to or containing a watercourse should provide or retain a 10m buffer zone.'	Suggest amendment to include a 10 metre buffer zone to watercourses	Comments noted and amendment proposed	Yes	Add '10 metre buffer zone' in to Ai and Bi
LPR087f	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV7 - Biodiversity and Geodiversity and Development (Strategic Policy)		Neutral	It is recognised that some minor amendments have generally been made to the adopted DBLP Policy ENV 7 to now include reference to the proposed Tees Valley Local Nature Recovery Strategy. Our Client recognises that this strategy is yet to be consulted upon, never mind adopted, and so they cannot support nor comment on its inclusion within draft Policy ENV 7 until this is justified by further evidence being provided. Secondly, our Client welcomes the retained flexibility within draft Policy ENV 7 at Part (A), whereby "Development proposals located within the areas listed below [including the River Tees Existing Green Corridor] are encouraged, where relevant, to support the achievement of these specific actions…". Notwithstanding this, given the location of our Client's site, they reserve the right to comment on this matter should they wish to at later stages of the Local Plan Review consultation.	Highlight that the Tees Valley LNRS is yet to be published or consulted on. Support flexibility of achieving measures in the River Tees existing green corridor.	It is acknowledged that the LNRS has yet to be published hence reference is made to it being proposed. It is expected that the LNRS will have been consulted upon prior to Reg 19 and published by the submission of the Local Plan so it is important that reference is included in the Local Plan. Support noted.	No	None
LPR125&126j	Environment	Josh White	Natural England		Policy	ENV7 - Biodiversity and Geodiversity		Neutral	Natural England broadly welcomes the provisions set out in ENV 7. The policy clearly sets out the mitigation hierarchy and ecological connectivity at both site and borough level. We believe there is scope to strengthen this policy. Although the policy makes reference to designated sites, we recommend that it clearly distinguish between international, national and local sites1. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites2 should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced. We recommend that any international and national designated sites are added to the draft Policies Map to make it clear where they are located in respect to any potential housing or employment land allocations. This will help to identify whether any designated sites may be subject to pressures from proposed housing or employment land allocations where they fall within an Impact Risk Zone (IRZ). Additionally we advice that the Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. This strategic approach should consider enhancements beyond what is considered in ENV 8 regarding integration of biodiversity enhancements as part of new development proposals and could potentially be integrated in an updated open space strategy as referenced in our advice on policy ENV 5. We welcome the commitment to protecting Local Geological Sites, including the existing sites at Killerby (North Lane Quarry), Houghton-le-Side (Disused Quarry, Side Hill), and High Coniscliffe (Disused Quarries). We recommend that paragraph E also includes provisions to support the enhancement and positive management of these Local Geological Sites.	Policy needs to more clearly distinguish between international, national and local sites. Policy Map should include all international and national designated sites to make location clear and assess impact risk. All sites should be illustrated on policies map. the Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Recommend that paragraph E also includes provisions to support the enhancement and positive management of these Local Geological Sites.	Comments noted and various amendments proposed to address these	Yes	Include reference to internationally important sites and adapt layout of policy. Include reference to other sites where biodiversity enhancement should take place. Add in reference to management and enhancement of Local Geological Sites.
LPR125&126m	Environment	Josh White	Natural England		Policy	ENV7 - Biodiversity and Geodiversity	Best and Most Versatile Agricultural Land and Soil Resources	Neutral	The Draft Plan lacks a policy for Best and Most Versatile (BMV) agricultural land and soil resources. The Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 180.	Plan lacks a policy on safeguarding best and most versatile land and soils to ensure consistency with NPPF.	Comments noted and amendment proposed to include reference to best and most versatile land and soils.	Yes	Reference to soils added in to Policy ENV7
LPR125&126o	Environment	Josh White	Natural England		Section	ENV7 - Biodiversity and Geodiversity	Local Nature Recovery Strategy (LNRS) and Biodiversity Net Gain (BNG) supporting wide nature recovery objectives	Neutral	There is currently limited articulation of how BNG funding and potential LNRS uplift could be strategically directed to support wider nature recovery objectives and associated public health benefits. The Plan would benefit from clarity on how LNRS priorities and measures should actively shape Biodiversity Net Gain delivery, particularly in guiding the location and prioritisation of off site BNG provision. For example, in informing habitat banks to provide access to nature and other environmental benefits (heat, noise, air, flood etc) relevant to population health. While the Plan references the Tees Valley LNRS, there is an opportunity to strengthen policy clarity by explicitly requiring the use of LNRS mapping as a spatial evidence base to inform site allocations, strategic growth areas and development management decisions.	Plan would benefit from clarity on how LNRS priorities and measures should actively shape Biodiversity Net Gain delivery, particularly in guiding the location and prioritisation of off site BNG provision. While the Plan references the Tees Valley LNRS, there is an opportunity to strengthen policy clarity by explicitly requiring the use of LNRS mapping as a spatial evidence base to inform site allocations, strategic growth areas and development management decisions.	Policy ENV8 does set out the prioritisation of where BNG offsetting should take place including reference to the LNRS. The LNRS is yet to be published so limited to the detail that can be referenced at this time. Some of the further detail on benefits are likely to be more appropriate in the Council's Climate and Nature Strategy.	No	None required
LPR032c	Environment	Richard Cowen	CPRE Durham		Policy	ENV8 – Assessing a Development's Impact on Biodiversity (strategic)		Support	While this may be more relevant for wildlife organisations. CPRE recognises the importance of protecting and improving provision for wildlife. This not only helps wildlife but there is now clear evidence that it helps human health and well-being. As places for wildlife are removed by development, it is important to do everything possible to provide new opportunities for it. We therefore fully support the provision for hedgehog highways, bat boxes and swift bricks. Such provision should be a standard requirement for Biodiversity Net Gain purposes. We are aware however that such provision has recently been questioned in the South Tyneside Local Plan examination. Our response is that it is essential when so much wildlife is at risk of being lost, and dealing with the needs of certain animals may well help others. However, we do question the meaning of "significant harm" in this Policy. How much harm has to be done to biodiversity before compensation provisions are required or refusal anticipated? On the face of it, this provision could allow quite a lot of harm to be committed to biodiversity but no remedial action would be required. We represent that this is not acceptable.	Support provision for hedgehog highways, bat boxes and swift bricks. Question the meaning of 'significant harm' How much harm has to be done to biodiversity before compensation provisions are required or refusal anticipated? On the face of it, this provision could allow quite a lot of harm to be committed to biodiversity but no remedial action would be required. We represent that this is not acceptable.	Support for elements of policy noted. The phrase 'significant harm' reflects the wording in the NPPF to ensure the policy is consistent with it.	No	N/A

LPR033a	Environment	Richard Cowen	Durham Bird Club		Policy	ENV8 – Assessing a Development's Impact on Biodiversity (strategic)		Support	We particularly support the reference to Swift bricks in this Policy. Swifts have been in significant decline for a number of years. They nest in holes in urban areas, particularly in older buildings. However, many of these holes have been filled in recent years following renovations or repairs to buildings, frequently without the owner realising the impact on birds such as Swifts. Recently, there has been a public move to seek to reverse this and provide places for Swifts, in particular, to breed. The book, Swifts and Us by Sarah Gibson, fully documents issues regarding Swifts, especially the reasons for their decline. She fully promotes efforts to reverse this, including providing space for them in new buildings. Durham Wildlife Trust is promoting a scheme in churches particularly in Durham City. In addition, proposals like this can help Swifts and we fully support it. Our attention has been brought by RSPB to the Guidance given by Brighton and Hove City Council which can be found at https://www.brighton-hove.gov.uk/planning/planning-applications/guidance-note-provision-swift-boxes-including-swift-bricks-new-development The Club as no special remit regarding bats and hedgehogs, but we also support the provisions in this Policy for them. We also note point e) of this Policy. We support this provision which appears to reflect our comments in respect of Policy ENV7 about the specific requirements of certain species which may be difficult or impossible to replicate.	Support reference to providing swift bricks, bat boxes and hedgehog highways in the policy. Provide reference to other guidance and information. Support part e in terms of it being difficult or impossible to replicate habitat.	Support noted	No	N/A
LPR037c	Environment	William Ward	The Woodland Trust		Policy	ENV8 – Assessing a Development's Impact on Biodiversity (strategic)		Support	This policy helps ensure BNG principles are embedded into the planning system and ensures that development contributes positively to nature recovery rather than simply mitigating harm. To strengthen the policy further, consideration should be given to setting a higher than statutory BNG requirement. While the current national requirement of 10% net gain represents a useful baseline, increasing this to 20% would help ensure that development delivers meaningful and measurable improvements in biodiversity, rather than only marginal gains that risk equating to no overall loss in practice. A higher target would better reflect the scale of biodiversity decline and the need for more ambitious action at the local level. Importantly, this uplift need not impose a significant additional burden on developers. Evidence suggests that the cost per biodiversity unit decreases as delivery scales up, meaning that moving from 10% to 20% is proportionally less costly than achieving the initial 0% to 10% gain. Setting a 20% BNG requirement would therefore represent a pragmatic and impactful enhancement to the policy, ensuring that Darlington maximises the environmental benefits of new development while maintaining viability.	Suggest a 20% net gain requirement is set.	Not a legal requirement and Councils are being strongly advised by government to not go above the mandatory requirement unless compelling evidence and justification can be provided. This does not currently exist for Darlington Borough.	No	None
LPR051l	Environment	Chris Martin	HBF		Policy	ENV8 - Assessing a Development's Impact on Biodiversity		Neutral	The HBF notes that this policy has been adapted to take into account statutory biodiversity net gain (BNG) and correctly refers the reader to the statutory framework. This is consistent with the PPG (Reference ID: 74-006-20240214) however, the PPG makes clear that not all development is subject to statutory BNG (Reference ID: 74-003-20240214). This distinction should be refer-enced in the policy. The policy also provides guidance on how sequentially BNG should be accommodated. Whilst this provides a clear hierarchy, it should also include national character areas as well as local planning authority boundaries. This will ensure that the policy is consistent with the statutory framework. The policy also requires all development proposals to include nest boxes (swift bricks), bat boxes and hedgehog highways. Whilst the HBF appreciates the idea of this policy, it does not consider the installation of such features to be appropriate in all cases. The need for such features should be evidenced through relevant ecological surveys submitted at the planning application stage. This will establish whether the site and/or proposed buildings are suitable in terms of their loca-tion, height, orientation and external factors such as noise to accommodate such species and whether such species are indeed present in the area. Without this information, it can be the case that developers may end up installing such features (at extra cost) for them to never be used.	Policy is not clear that some developments are exempt from statutory BNG. The BNG hierarchy should also include national character areas to be consistent with the statutory framework. Installation of nest boxes, swift bricks and hedgehog highways are not appropriate in all cases and need should be evidenced through ecological surveys to establish suitability.	The policy does state in accordance with the statutory BNG requirement and framework so this is considered to be clear but some additional wording could be added such as 'where not exempt'. The requirement for nest boxes, bat boxes and swift bricks does state, consistent with national policy, that unless they are compelling technical reasons which prevent their use or make them ineffective. So an applicant could demonstrate this through an ecological survey and then they wouldn't need to be provided in circumstances where they would be ineffective. The Council's ecologist would advise on the suitability of location at the application stage. The Statutory Framework has been amended to remove reference to National Character areas and refer to Local Nature Recovery Strategy areas instead.	Yes	Add 'where not exempt.'
LPR064 & 065m	Environment	Nick Pleasant	Stantec on behalf of Vistry		Policy	ENV8 - Assessing a Development's Impact on Biodiversity (strategic)		Neutral	Vistry has no objection in principle to the requirements outlined in Policy ENV8 and recognise that the requirement for Biodiversity Net Gain is now well established as part of development proposals. It is, however. pertinent to flag that the requirements introduced for a Preliminary Ecological Appraisal and Ecological Impact Assessment and/or species/ habitat specific surveys are not policy matters and they should be removed and instead DBC's validation checklist updated to reflect this requirement. Vistry reserves the right to revisit this position should circumstances change.	No objection in principle but requirements for surveys are not policy matters and should be removed and included in validation requirements	The surveys required are set out in the current adopted policy but has just been updated to reflect naming. It is considered including them within the policy provides clarity to officers and applicants of the information that will be required related to the policies on protected habitats and species.	No	None required
LPR067 & 68k	Environment	Georgina Cox	Gladman		Policy	ENV8 - Assessing a Development's Impact on Biodiversity (strategic)		Neutral	Gladman does not support the requirement for all development proposals to include nest boxes, bat boxes and hedgerow highways. The installation of these features is not always appropriate and should be evidenced through relevant ecological surveys submitted at the planning application stage. This will determine whether the species are present and where best to locate these features following the appropriate surveys.	Installation of nest boxes, swift bricks and hedgehog highways are not appropriate in all cases and need should be evidenced through ecological surveys to establish suitability.	The requirement for nest boxes, bat boxes and swift bricks does state, consistent with national policy, that unless they are compelling technical reasons which prevent their use or make them ineffective. So an applicant could demonstrate this through an ecological survey and then they wouldn't need to be provided in circumstances where they would be ineffective. The Council's ecologist would advise on the suitability of location at the application stage.	No	None
LPR087g	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV8 - Assessing a Development's Impact on Biodiversity (strategic policy)		Object	When considering draft Policy ENV 8 in its entirety, it is acknowledged that the Council has sought to update the Policy to reflect the requirement to deliver BNG as set out within the Environment Act 2021 (as amended). Our Client appreciates that this update is broadly reflective of the Planning Practice Guidance at Paragraph: 006 Reference ID: 74-006-20240214. However, draft Policy ENV 8 does not clearly articulate that BNG requirements do not apply to exempt categories of development. In its current form, the Policy therefore risks overprescribing BNG requirements to development where it is not considered necessary. Our Client requests that the Council consider the wording of this policy to better reflect the guidance set out within the Planning Practice Guidance. The Inter alia text and criteria (vi) – (viii) require all (own emphasis) development proposals to include features which support priority or threatened species unless there are compelling technical reasons which prevent their use or make them effective. These include integrated nest boxes, integrated bat boxes, and hedgehog highways. Notwithstanding the typographical error regarding the use of "they" instead of "there", our Client has wider concerns that the Policy wording, as drafted, does not allow sufficient flexibility to respond appropriately to site-specific constraints and opportunities. As such, our Client would request that the Council follows wording at supporting paragraph 9.6.12 and includes additional text to the nature of "where relevant", or "where informed by the appropriate ecological assessments and/or surveys".	Policy is not clear that some developments are exempt from statutory BNG. Typo in paragraph 2 'they' instead of 'their'. Installation of nest boxes, swift bricks and hedgehog highways are not appropriate in all cases and need should be evidenced through ecological surveys to establish suitability.	The policy does state in accordance with the statutory BNG requirement and framework so this is considered to be clear but some additional wording could be added such as 'non-exempt'. The requirement for nest boxes, bat boxes and swift bricks does state, consistent with national policy, that unless they are compelling technical reasons which prevent their use or make them ineffective. So an applicant could demonstrate this through an ecological survey and then they wouldn't need to be provided in circumstances where they would be ineffective. The Council's ecologist would advise on the suitability of location at the application stage.	Yes	Add 'non-exempt.'
LPR104q	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621232	Policy	Policy ENV8: Assessing a Development's Impact on Biodiversity (Strategic Policy)		Unknown	17.1 Taylor Wimpey supports the objective of protecting and enhancing biodiversity; however, it is essential that the policy is fully aligned with and reflects the National Planning Policy Framework. Justification 17.2 Taylor Wimpey notes that the policy has been updated to reflect the statutory requirements for biodiversity net gain (BNG) and appropriately refers to the statutory Framework. This approach is consistent with national guidance; however, the Planning Practice Guidance makes clear that not all forms of development are subject to statutory BNG. This distinction should be expressly acknowledged within the policy to ensure clarity and consistency with national policy. 17.3 The policy also sets out a sequential approach to the delivery of BNG. While the establishment of a clear hierarchy is supported, the sequential Framework should extend beyond local planning authority boundaries to include relevant national character areas, in line with the statutory regime. This would ensure that the policy is fully aligned with the national Framework and the 2024 National Planning Policy Framework's requirement for locally specific policies to be consistent with national policy and effective in their application. Proposed Approach 17.4 To address the comments, the following approach is proposed: • Reflect national policy and guidance.	Policy is not clear that some developments are exempt from statutory BNG. The BNG hierarchy should also include national character areas to be consistent with the statutory framework.	The policy does state in accordance with the statutory BNG requirement and framework so this is considered to be clear but some additional wording could be added such as 'where not exempt'. The Statutory Framework has been amended to remove reference to National Character areas and refer to Local Nature Recovery Strategy areas instead.	Yes	Add 'non-exempt.'

LPR105q	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621234	Policy	ENV8 - Assessing a Development's Impact on Biodiversity (Strategic Policy)		Support	Taylor Wimpey supports the objective of protecting and enhancing biodiversity; however, it is essential that the policy is fully aligned with and reflects the National Planning Policy Framework. Taylor Wimpey notes that the policy has been updated to reflect the statutory requirements for biodiversity net gain (BNG) and appropriately refers to the statutory Framework. This approach is consistent with national guidance; however, the Planning Practice Guidance makes clear that not all forms of development are subject to statutory BNG. This distinction should be expressly acknowledged within the policy to ensure clarity and consistency with national policy. 17.3 The policy also sets out a sequential approach to the delivery of BNG. While the establishment of a clear hierarchy is supported, the sequential Framework should extend beyond local planning authority boundaries to include relevant national character areas, in line with the statutory regime. This would ensure that the policy is fully aligned with the national Framework and the 2024 National Planning Policy Framework's requirement for locally specific policies to be consistent with national policy and effective in their application.To address the comments, the following approach is proposed: • Reflect national policy and guidance.	Policy is not clear that some developments are exempt from statutory BNG. The BNG hierarchy should also include national character areas to be consistent with the statutory framework.	The policy does state in accordance with the statutory BNG requirement and framework so this is considered to be clear but some additional wording could be added such as 'where not exempt'. The Statutory Framework has been amended to remove reference to National Character areas and refer to Local Nature Recovery Strategy areas instead.	Yes	Add 'non-exempt.'
LPR111 & 112l	Environment	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	ENV8 - Assessing a Development's Impact on Biodiversity (strategic)		Object	Draft Policy ENV 8, through criteria (vi) – (viii), requires all development proposals to include features which support priority or threatened species unless there are compelling technical reasons which prevent their use or make them effective. This includes integrated nest boxes, integrated bat boxes, and hedgehog highways. Furthermore, Draft Policy ENV 8 requires all development proposals should include biodiversity enhancement measures including bird nest boxes, bee bricks, native plant and tree species planting, pollinator friendly planting and other wildlife features where appropriate. Notwithstanding the typographical error regarding the use of "they" instead of "there" within the revised policy wording, our Client has broader concerns that policy, as drafted, does not provide sufficient flexibility when considering site-specific constraints and opportunities. The principal intention of Draft Policy ENV 8 to ensure the protection of priority species is commended by our Client; and it is assumed that flexibility is intended by the Council through the allowance for 'compelling reasons' to be evidenced, where such features cannot be incorporated. However, 'compelling reasons' is considered to be an entirely subjective term, without definition, and at first glance could be taken to represent an exceptionally high bar to overcome. Site-specific ecological surveys and associated technical work undertaken to support a given development proposal will clearly inform whether such habitat features cannot be incorporated within a scheme in given circumstances, owing to site-specific ecological context and wider contextual constraints on-site and in the immediate surroundings. It is unclear therefore why such evidence needs to be 'compelling'. Our Client would request that this threshold to justify the non-provision of such features is amended accordingly.	Typo in paragraph 2 'they' instead of 'their'. Installation of nest boxes, swift bricks and hedgehog highways are not appropriate in all cases and need should be evidenced through ecological surveys to establish suitability. Question use of the word 'compelling'	The requirement for nest boxes, bat boxes and swift bricks does state, consistent with national policy, that unless they are compelling technical reasons which prevent their use or make them ineffective. So an applicant could demonstrate this through an ecological survey and then they wouldn't need to be provided in circumstances where they would be ineffective. The Council's ecologist would advise on the suitability of location at the application stage.	Yes	Add further details in para 9.6.12 on process for nest boxes, bat boxes etc.
LPR113 & 114n	Environment	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy	ENV8 – Assessing a Development's Impact on Biodiversity (strategic)		Neutral	Bellway have no objection in principle to the requirements outlined in Policy ENV8 and recognise that the requirement for Biodiversity Net Gain is now well established as part of development proposals. Bellway do find it pertinent to flag that the requirements introduced for a Preliminary Ecological Appraisal and Ecological Impact Assessment and/or species/ habitat specific surveys are not policy matters and they should be removed and instead DBC's validation checklist updated to reflect this requirement.	No objection in principle but requirements for surveys are not policy matters and should be removed and included in validation requirements	The surveys required are set out in the current adopted policy but has just been updated to reflect naming. It is considered including them within the policy helps officers and applicants understand the information that will be required	No	None required
LPR125&126k	Environment	Josh White	Natural England		Policy	ENV8 - Assessing a Development's Impact on Biodiversity		Support	Natural England welcomes Policy ENV 8, which seeks to maximise opportunities to enhance ecological networks across Darlington. We welcome the inclusion of features such as integrated nest boxes, integrated bat boxes, and hedgehog highways. We also welcome the process set out whereby applications for proposals that may impact sites of biodiversity importance, as identified in Policy ENV 7, are required to follow the sequence of actions outlined in Policy ENV 8.	Support for policy and the range of measures it includes	Support noted	No	None required
LPR064 & 065n	Environment	Nick Pleasant	Stantec on behalf of Vistry		Policy	ENV9 - Outdoor Sports Facilities		Neutral	Vistry has no objection at present concerning the amendment to Policy ENV9 to use the Sport England Playing Pitch and Facility Calculator informed by the Playing Pitch and Built Facility Strategy (2021 or later update) to determine the need, and where required, total amount of developer contributions required towards outdoor sport facilities. However, they reserve the right to revisit this position should circumstances change.	No objection to the use of the Sport England Playing pitch calculator.	No objection noted	No	None required
LPR087h	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV9 - Outdoor Sports Facilities		Object	Inter alia text added to draft Policy ENV 9 outlines that residential proposals comprising 20 dwellings or more will be required to comply with the Sport England Playing Pitch and Facility Calculator informed by the Playing Pitch and Built Facility Strategy, or later update. Considering the additional wording as two distinct matters, as set out below, our Client has general concerns regarding the absence of any publicly available, robust or justified evidence suggesting the appropriateness of such an addition. Furthermore, the Calculator does not appear to be publicly available to utilise, which makes it difficult for developers to plan accordingly. 1. The threshold of 20 dwellings Our Client questions how the Council has arrived at a trigger threshold of 20 dwellings in the absence of any publicly available supporting evidence. The supporting text at paragraph 9.7.7 confirms the Council are actively updating their Playing Pitch and Built Facility Strategy along with the accompanying needs assessment and evidence base. This clearly indicates that the Council recognises that its existing evidence base, and consequential playing pitch requirements, are out of date. Until such time as the Council can robustly evidence the need for such facilities, the introduction of any threshold is considered inappropriate and ambiguous, contrary to paragraph 32 of the NPPF. 2. Whole Plan Viability The absence of supporting evidence also suggests that development viability has not been taken into account when establishing both the need for, and the threshold triggering, developer contributions. Our Client can therefore provide no further comment until further evidence considering need and viability is produced by the Council. Notwithstanding this, our Client would remind the Council that any developer contributions have to be necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind to the development in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).	Lack of up to date evidence or calculator to support inclusion of requirement	An update of the Playing Pitch Strategy and Built Facilities Assessment has now been finalised and the Playing Pitch calculator is finalised too. The policy has been updated to reflect this.	Yes	Reference to updated Playing Pitch Strategy
LPR104r	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621233	Policy	Policy ENV9: Outdoor Sports Facilities		Unknown	18.1 Taylor Wimpey supports the principle of the policy; however, there are concerns that it is not supported by a sufficiently robust and up-to-date evidence base, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified and effective. Justification 18.2 Taylor Wimpey is concerned that the policy is underpinned by evidence dating from 2021, which is no longer considered sufficiently up to date. In the absence of refreshed assessments, the policy cannot be demonstrated to be justified or effective, contrary to the requirements of the 2024 National Planning Policy Framework. Proposed Approach 18.1 To address the comments, the following approach is proposed: • Provide an updated assessment of Playing Pitch and Built Facilities Strategy.	Lack of up to date evidence to support inclusion of requirement	An update of the Playing Pitch Strategy and Built Facilities Assessment has now been finalised and the Playing Pitch calculator is finalised too. The policy has been updated to reflect this.	Yes	Reference to updated Playing Pitch Strategy
LPR105r	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621235	Policy	ENV9 - Outdoor Sports Facilities		Support	Taylor Wimpey supports the principle of the policy; however, there are concerns that it is not supported by a sufficiently robust and up-to-date evidence base, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified and effective. Taylor Wimpey is concerned that the policy is underpinned by evidence dating from 2021, which is no longer considered sufficiently up to date. In the absence of refreshed assessments, the policy cannot be demonstrated to be justified or effective, contrary to the requirements of the 2024 National Planning Policy Framework. To address the comments, the following approach is proposed: • Provide an updated assessment of Playing Pitch and Built Facilities Strategy.	Lack of up to date evidence to support inclusion of requirement	An update of the Playing Pitch Strategy and Built Facilities Assessment has now been finalised and the Playing Pitch calculator is finalised too. The policy has been updated to reflect this.	Yes	Reference to updated Playing Pitch Strategy
LPR113 & 114o	Environment	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy	ENV9 – Outdoor Sports Facilities		Neutral	Bellway have no objection at present concerning the amendment to Policy ENV9 to use the Sport England Playing Pitch and Facility Calculator informed by the Playing Pitch and Built Facility Strategy (2021 or later update) to determine the need, and where required, total amount of developer contributions required towards outdoor sport facilities. However, they reserve the right to revisit this position should circumstances change.	No objection at present to inclusion of use of the Sport England calculator for playing pitches and sports facilities.	No objection noted	No	None required
LPR032d	Environment	Richard Cowen	CPRE Durham		Policy	ENV10 – Trees & Hedges (strategic)		Support	CPRE nationally has been actively promoting the retention and improvement of hedges. Indeed, CPRE was involved in the bringing about the Hedgerow Regulations. The retention of hedges, and trees, is very important to us and we welcome this Policy	Welcome the policy	Support for policy noted	No	N/A

LPR037d	Environment	William Ward	The Woodland Trust		Policy	ENV10 – Trees & Hedges (strategic)	ENV10 - Trees and Hedges	Support	The Woodland Trust welcomes the inclusion of a dedicated trees and hedges section within the updated Local Plan. This represents a positive and necessary step, clearly demonstrating the Council's recognition of the vital role that trees, woodlands, and green infrastructure play in delivering biodiversity, climate resilience, and improved quality of life for residents. Embedding this within planning policy signals a strong commitment to nature recovery and aligns well with broader environmental priorities. To further strengthen this policy and ensure it delivers meaningful, long-term outcomes, we would suggest the following enhancements: •First, the policy should explicitly state that development proposals resulting in the loss or deterioration of ancient woodland and/or veteran trees will be refused, except in wholly exceptional circumstances, as stated within the National Planning Policy Framework. These habitats are irreplaceable, and stronger wording would provide clarity to applicants while reinforcing their protection. •There should should be a clear requirement for developers to retain existing trees wherever possible. Where removal is unavoidable, replacement planting should be secured at a ratio of at least three new trees for every one lost. This would help ensure that development results in a net gain in canopy cover over time. •This policy would benefit from setting a minimum canopy cover target for new developments. Establishing measurable expectations at the outset would support better design outcomes and ensure that tree planting is integrated meaningfully rather than treated as an afterthought. •Developers should be encouraged to prioritise a diverse mix of native, broadleaf tree species, sourced from local or UK-based nurseries where possible. This would enhance ecological value, improve resilience to pests and diseases, and support local supply chains. •Finally, the Council could strengthen its strategic approach by utilising tools such as the Woodland Trust's Tree Equity Score UK to identify neighbourhoods with the greatest need for increased tree cover. This evidence-based approach could then inform the setting of neighbourhood-specific canopy cover targets, ensuring that investment in urban greening is directed where it will have the greatest social and environmental benefit. Overall, the inclusion of this policy is very welcome. With these refinements, it has the potential to become a robust and forward-looking framework that meaningfully enhances Darlington's natural	Support inclusion of policy with a range of suggestions to how this could be strengthened further including in relation to ancient woodland and veteran trees, retaining existing trees, minimum canopy cover score and use of tools such as the Tree Equity score.	Support for policy inclusion noted. Amendment proposed regarding ancient woodland and veteran trees. Wording amendment proposed regarding retaining existing tree wherever possible and ensuring replacement planting. Further exploration to be undertaken regarding minimum canopy cover requirement and use of tools such as the Tree Equity Score UK. Additional wording proposed regarding native broadleaf tree species.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR051m	Environment	Chris Martin	HBF		Policy	ENV10 - Trees and Hedges		Neutral	The HBF agrees that the retention of trees and hedges are important, although it is considered that the current approach to Policy ENV10 is too restrictive. Sometimes tree or hedgerow loss is unfortunately unavoidable, even when they are taken into account as constraints early on in the design process. For instance, there could be loss in order to create a safe access into a develop-ment, or in order to provide a coherent site layout, or to ensure land is used efficiently (as required by Section 11 of the NPPF). The HBF therefore considers that the wording needs to be amended so that trees and hedges are to be retained 'wherever possible'. This also better aligns with the wording contained in the NPPF (paragraph 136). Where trees are removed, the policy requires that the deadwood created should be retained on-site to create invertebrate/amphibian/hedgehog refugia and hibernacula. It also states that where safe to do so, larger tree trunks/stems should be retained as standing monoliths to support wildlife such as woodpeckers and bats. Whilst this requirement is clearly laudable, such an approach is unlikely to be appropriate on all sites and developments, plus if the trees are diseased then this could actually have a detrimental effect on surrounding flora and fauna. The HBF considers that this part of the policy should be reworded to encourage this where appropriate rather than man-dating it for all sites.	Wording around retention of trees and hedgerows too restrictive. Needs to acknowledge there are circumstances where removal is unavoidable. Retention of deadwood and monoliths on site should be encouraged where possible rather than mandating for all sites.	Amendments proposed to wording to make clear that retention is wherever possible. The policy does state where safe to do so in relation to standing monoliths but wording amendment is proposed to add further clarity.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR059 & 60i	Environment	Dominic Crowley	Lichfields		Policy	ENV10 – Trees & Hedges (strategic)		Object	Hallam Land acknowledge the importance of valuable trees and hedgerows as part of development proposals and welcome the reflection of this in local planning policy, however the proposed wording of Policy ENV10 is considered unduly restrictive and onerous in its presumption of retention. The policy should be reworded to make clear that retention and protection of hedges and trees may not be the most appropriate solution in some instances and this should be considered on a case-by-case basis (for example where the trees/hedges are of low quality, and their removal would facilitate a higher quality development with significant improved tree/hedgerow/habitat provision elsewhere). Whilst the benefits of retention of deadwood on site (in instances of tree removal) to facilitate habitat creation may be appropriate in some circumstances, there may be situations where alternative measures are more appropriate / effective. The policy should be reworded to allow for the most effective solutions for reuse of deadwood and habitat creation to be considered on a case by case basis.	Wording around retention of trees and hedgerows too restrictive. Needs to acknowledge there are circumstances where removal is unavoidable. Retention of deadwood and monoliths on site should be encouraged where possible rather than mandating for all sites.	Amendments proposed to wording to make clear that retention is wherever possible. The policy does state where safe to do so in relation to standing monoliths but wording amendment is proposed to add further clarity.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR064 & 065o	Environment	Nick Pleasant	Stantec on behalf of Vistry		Policy	ENV10 – Trees & Hedges (strategic)		Neutral	Vistry has no objection in principle to the requirements outlined in Policy ENV10. However, it is important that its requirements are applied in a proportionate and flexible way. The cumulative impact of the policy requirements could impact developable area, layout efficiency and additional costs particularly on constrained sites. Vistry would encourage DBC to ensure appropriate flexibility to allow site specific constraints to be mitigated through alternative forms of solutions where necessary, ensuring the development remains viable and the delivery of housing is not compromised.	Flexibility required for site specific constraints which may mean removal is unavoidable.	Amendments proposed to wording to make clear that retention is wherever possible.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR067 & 68k	Environment	Georgina Cox	Gladman		Policy	ENV10 - Trees and Hedges		Neutral	Gladman supports the importance of the retention of trees and hedges, however sometimes the loss may be unavoidable. Even if constraints are proactively dealt with early on in the design process, not always can all the tree's and hedges be retained. The policy ENV10 is therefore too restrictive, and we would suggest the policy wording for trees and hedges to be retained 'wherever possible,' so that the policy does not prevent development coming forward.	Flexibility required for site specific constraints which may mean removal is unavoidable.	Amendments proposed to wording to make clear that retention is wherever possible.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR087i	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV10 - Trees and Hedges (strategic policy)		Object	Generally, our Client agrees with the principles of draft Policy ENV 10, and acknowledges the importance of retaining trees and hedgerow across development sites where it can be achieved, and when considering all technical and environmental factors in combination. That said, the wording of Policy ENV 10 as drafted risks precluding allocated development throughout the Plan. Our Client's site includes a number of hedgerows which bisect internal field boundaries. Whilst development on the site will account for the presence of such vegetation, and seek to retain as much as possible during the design process, in order to feasibly deliver residential development at the site, it is likely that some elements may have to be removed. This approach is not uncommon during residential development, and is naturally a result of a number of technical and policy considerations, including making effective use of land as prescribed by Section 11 of the NPPF. As such, our Client considers it appropriate to amend the wording of the inter alia text at the start of draft Policy ENV 10 to include reference to "where possible", or similar. Our Client has significant concern regarding the additional wording added in Policy ENV 10, which suggests that "Development proposals resulting in the loss of, or damage to trees will be required to provide suitable replacement trees on-site, or where this is not possible, suitable compensatory planting off-site in the locality, including appropriate provision for management and maintenance". Similar wording is proposed in Policy ENV 10 regarding hedgerows. It is assume this also requires a contribution for maintenance. There is no requirement in national policy for loss of site trees/hedgerows to be compensated through off site planting. We further contend that it would not accord with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). There are clear delivery issues if there is no available or suitable land to deliver off site planting. Furthermore, it does not give any consideration for the quality or assessment of the trees, which may conclude that some species are suitable for removal in any case following a tree survey and assessment against the relevant British Standards (Category A, B, C or U). On this basis, our client objects to the additional wording and suggest that it is removed. Our Client also questions the necessity of the Council's requirement to provide on-site invertebrate / amphibian / hedgehog refugia and hibernacula where trees are removed. While our Client supports the	Flexibility required for site specific constraints which may mean removal is unavoidable. Suggest wording on replacement planting including off-site is removed. Deadwood and standing monoliths should be clarified with 'where appropriate'.	Amendments proposed to wording to make clear that retention is wherever possible. The policy does state where safe to do so in relation to standing monoliths but wording amendment is proposed to add further clarity.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.

LPR094g	Environment	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469243	Policy	Policy ENV 10 Trees and Hedges		Support/Ob	Whilst Mandale Homes acknowledge the benefits of trees and hedges stated within the policy, as currently written it is too restrictive. There will clearly be some situations where the removal of trees and hedgerows to facilitate development is unavoidable, including where they may be of accepted value. To align with paragraph 136 of the NPPF, it is recommended that the wording 'wherever possible' is added to the policy, for example within the first paragraph and at criterion a of the second paragraph. With regards to the reference to retaining deadwood on site, this should be 'encouraged where appropriate' as opposed to mandated, because it is unlikely to be suitable in all instances where trees have been felled. Furthermore, it may not always be advantageous to retain such from an ecological point of view, and any retention should be informed by Ecologist advice.	Flexibility required for site specific constraints which may mean removal is unavoidable. Suggest wording on replacement planting including off-site is removed. Deadwood and standing monoliths should be clarified with 'where appropriate'.	Amendments proposed to wording to make clear that retention is wherever possible. The policy does state where safe to do so in relation to standing monoliths but wording amendment is proposed to add further clarity.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR097a	Environment	Irene Ord	Resident		Policy	ENV10 - Trees and Hedges (strategic)		Object	Policy ENV10 Trees & Hedges Strategic Policy DBC planners should emphasise that developers need to AVOID future conflicts and impacts on others residential amenity. There is no reason why evergreen trees should be permitted to be planted close to boundaries and outgrow their own land, block sun-light/daylight to established adjacent neighbours. Badly impacted neighbours presently are being advised to invoke established law – 2003 Anti-Social Behaviour Act (High Hedges) at their own expense of time and money - which is an insult to an injury that could have been curtailed during the developer's planning process.	Policy should emphasise the need to avoid future conflicts and impacts on others residential amenity by avoiding inappropriate planting such as evergreen trees	The policy does require tree and hedgerow planting to be designed to avoid future conflicts and unacceptable impacts on residential amenity.	No	None required
LPR104s	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621234	Policy	Policy ENV10: Trees and Hedges (Strategic Policy)		Unknown	19.1 Taylor Wimpey are supportive of the principles of the policy but consider the wording proposed to be too restrictive. Justification 19.2 Taylor Wimpey supports the retention of trees and hedgerows as an important component of well-designed and sustainable development. However, it is considered that the approach set out in Policy ENV10 is overly restrictive. In practice, the loss of individual trees or hedgerows may be unavoidable, even where these features have been identified and taken into account at an early stage of the design process. For example, removal may be necessary to facilitate safe and appropriate site access, achieve a coherent and legible layout, or to ensure the efficient use of land, consistent with the objectives of the 2024 National Planning Policy Framework. 19.3 Taylor Wimpey therefore considers that the policy wording should be amended to require the retention of trees and hedgerows "wherever possible", which would better reflect the balanced and proportionate approach advocated by national policy, including paragraph 136 of the Framework. 19.4 Where tree removal does occur, the policy currently requires deadwood to be retained on site to create habitat refugia and, where safe to do so, for larger trunks or stems to be retained as standing monoliths. While the ecological intent of this approach is acknowledged, such requirements may not be appropriate or practicable in all circumstances. In particular, the mandatory retention of diseased or unsafe material could have unintended adverse effects on biodiversity or site safety. In this regard, it is considered that this element of the policy should be reworded to encourage such measures where appropriate, rather than applying a blanket requirement across all developments, to ensure consistency with the Framework's emphasis on flexibility, proportionality and effective decision-making. Proposed Approach 19.1 To address the comments, the following approach is proposed: • Amend policy wording to allow more flexibility to reflect national planning policy and guidance	Flexibility required for site specific constraints which may mean removal is unavoidable. Suggest wording on replacement planting including off-site is removed. Deadwood and standing monoliths should be clarified with 'where appropriate'.	Amendments proposed to wording to make clear that retention is wherever possible. The policy does state where safe to do so in relation to standing monoliths but wording amendment is proposed to add further clarity.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR105s	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621236	Policy	ENV10 - Trees and Hedges (Strategic Policy)		Neutral	Taylor Wimpey are supportive of the principles of the policy but consider the wording proposed to be too restrictive. Taylor Wimpey supports the retention of trees and hedgerows as an important component of well-designed and sustainable development. However, it is considered that the approach set out in Policy ENV10 is overly restrictive. In practice, the loss of individual trees or hedgerows may be unavoidable, even where these features have been identified and taken into account at an early stage of the design process. For example, removal may be necessary to facilitate safe and appropriate site access, achieve a coherent and legible layout, or to ensure the efficient use of land, consistent with the objectives of the 2024 National Planning Policy Framework. 19.3 Taylor Wimpey therefore considers that the policy wording should be amended to require the retention of trees and hedgerows "wherever possible", which would better reflect the balanced and proportionate approach advocated by national policy, including paragraph 136 of the Framework. 19.4 Where tree removal does occur, the policy currently requires deadwood to be retained on site to create habitat refugia and, where safe to do so, for larger trunks or stems to be retained as standing monoliths. While the ecological intent of this approach is acknowledged, such requirements may not be appropriate or practicable in all circumstances. In particular, the mandatory retention of diseased or unsafe material could have unintended adverse effects on biodiversity or site safety. In this regard, it is considered that this element of the policy should be reworded to encourage such measures where appropriate, rather than applying a blanket requirement across all developments, to ensure consistency with the Framework's emphasis on flexibility, proportionality and effective decision-making. To address the comments, the following approach is proposed: • Amend policy wording to allow more flexibility to reflect national planning policy and guidance	Flexibility required for site specific constraints which may mean removal is unavoidable. Suggest wording on replacement planting including off-site is removed. Deadwood and standing monoliths should be clarified with 'where appropriate'.	Amendments proposed to wording to make clear that retention is wherever possible. The policy does state where safe to do so in relation to standing monoliths but wording amendment is proposed to add further clarity.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR111 & 112g	Environment	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy	ENV10 - Trees and Hedges (Strategic Policy)		Object	Our Client has concerns regarding the current proposed wording for Policy ENV10, and the unintentional consequences that this could have for the delivery of both allocated and windfall development sites. The introductory paragraph within Draft Policy ENV10 reads as follows: "Development proposals should retain and protect trees and hedges, both on and adjacent to the site, that have amenity, biodiversity, landscape or historic value or contribute to the setting and/or character of a settlement unless the benefits of the proposal clearly outweigh the harm." Whilst the wording does make reference to a weighting exercise with benefits to be demonstrated, we do not consider that the proposed policy wording goes far enough in this respect. There is no allowance for a wider assessment of site-specific contextual considerations, where loss of trees or hedgerows to facilitate access, for example, may be unavoidable, as part of a balancing exercise to justify the loss of trees and hedgerows. Taking the Hall Farm (Site 100) Allocation as an example, the Site Allocation Statement in Appendix B of the Plan requires an "outer distributer road, running north south across the site" to be delivered in order to facilitate the development. The delivery of this infrastructure is not feasible without the loss of existing hedgerows/vegetation to accommodate the route. Reading the wording of Draft Policy ENV10 in this regard, applied onerously the draft policy could effectively stymy the delivery of a key infrastructure requirement for the site allocation if a view was taken that the hedgerow running east-west across the Site, for example, was considered to have 'amenity, biodiversity, landscape of historic value' and where undefined 'benefits', terms which are not defined and have different meaning to different stakeholders. The arbitrary nature of these terms, and the reference to 'harm' at the end of the above paragraph – again a subjective term depending on the assessing party – along with the lack of flexibility to account for site-specific requirements, means that Draft Policy ENV10 as currently worded is not positively prepared nor effective in this regard. A simple solution to resolve the concerns identified above would to be amend the wording of Draft Policy ENV10 to include reference to retaining trees and hedgerows where possible, having consideration of site-specific constraints where the loss of such features may be unavoidable to facilitate development.	Flexibility required for site specific constraints which may mean removal is unavoidable.	Amendments proposed to wording to make clear that retention is wherever possible.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR113 & 114p	Environment	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy	ENV10 – Trees & Hedges (strategic)		Neutral	Bellway have no objection in principle to the requirements outlined in Policy ENV10. However, it is important that its requirements are applied in a proportionate and flexible way. The cumulative impact of the policy requirements could impact developable area, layout efficiency and additional costs particularly on constrained sites. Bellway would encourage DBC to ensure appropriate flexibility to allow site specific constraints to be mitigated through alternative forms of solutions where necessary, ensuring the development remains viable and the delivery of housing is not compromised.	Flexibility required for site specific constraints which may mean removal is unavoidable.	Amendments proposed to wording to make clear that retention is wherever possible.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.

LPR071l	Housing	Dale Morris	Homes by Esh	Joe Ridgeon, Hedley Planning Services, Tanners Burn Business Park, Burn Lane, Hexham, NE46 3RU joe@hedleyplanning.co.uk	Policy	ENV10 - Trees and Hedges		Support an	Our client supports the retention of trees and hedges; however, it is considered that the current approach to Policy ENV10 is too restrictive. Occasionally tree or hedgerow loss is unavoidable, even when they are taken into account as constraints early on in the design process. For example, to create a safe access into a development, or to provide a better site layout, or to ensure land is used efficiently (as required by Section 11 of the NPPF).Our client therefore objects to the current wording and recommend that it be amended so that trees and hedges are to be retained 'wherever possible'. This also better aligns with the wording contained in the NPPF (paragraph 136).	Flexibility required for site specific constraints which may mean removal is unavoidable.	Amendments proposed to wording to make clear that retention is wherever possible.	Yes	Numerous amendments proposed to policy reflecting these comments and those made by other respondents.
LPR064 & 065p	Environment	Nick Pleasant	Stantec on behalf of Vistry		Policy	ENV11 - Nutrient Neutrality (strategic)		Neutral	Vistry broadly supports Policy ENV11 in seeking a proactive approach to delivering nutrient neutrality in the face of ongoing challenges on the matter. However, we request further detail is added to recognise national policy direction and allow flexibility over the longer term such as Natural England removing any advice against granting new development or providing further strategic scale nutrient mitigation which reduces the burden on the council and developers. Vistry supports a clear policy direction for nutrient neutrality but wishes to highlight there is an inevitable cost to delivering the policy requirement which needs to be taken into account in the evidence base.	Broad support. Policy should recognise national policy direction and allow flexibility for changes over the longer term. Policy has cost implications	Policy has been amended to acknowledge circumstances where NN may no longer need to be applied. Reference is added to the Natural England methodology and NN calculator which are updated to reflect the latest regulations. This avoids referring to specific legislation which could then be updated.	Yes	Add in 'unless Natural England have confirmed this is no longer required in the Tees Catchment' and reference to the NN calculator
LPR087j	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy	ENV11 Nutrient Neutrality		Object	Our Client recognises that Policy ENV 11 has been introduced in response to the requirement for nutrient neutrality, which came into effect in March 2022. While the overarching principles on which the Policy is based are broadly understood by our Client, they consider that, in its current form, the Policy is not positively prepared, effective, or consistent with national policy. Firstly, the policy as drafted, places an unduly large emphasis on residential development being the predominant cause nutrient neutrality as a result of overnight accommodation. While our Client recognises a proportionate responsibility in the process, much of the responsibility lies with the water industry. This should, to some extent, be reflected within the Policy accordingly. Similarly, the Council will be aware of the requirement for water companies to ensure wastewater works serving a population equivalent to over 2,000 people meet specified nutrient removal standards by 1st April 2030. Currently, Policy ENV 11 does not account for this legislative requirement, and so our Client considers that appropriate allowance should be made within the Policy. It is the role of the Council to find suitable wording for their development plan policies; however, in order to assist, our Client suggests that the Policy should include a commitment to ensure that any relevant amendments arising from legislative requirements are duly incorporated when such requirements come into effect in 2030. By way of example, the following could be included within the Policy: "The provisions of the Regeneration and Levelling Up Act 2023 include a duty for water authorities in nutrient neutrality areas to upgrade their waste treatment works by 2030. This will help ensure nitrogen is removed before it is discharged into affected rivers. Once these upgrades are in operation, the Council will take into account the benefits of the upgrade and revise its approach to nutrient neutrality accordingly".	Unduly large emphasis placed on residential development. TAL requirement changes in 2030 not referenced or appropriate allowance made. Modified wording suggested.	The policy does not place unduly large emphasis on residential development. It simply sets out the requirements that have been applied by Natural England and does apply to other types of development that would increase the discharge of nitrogen. LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the latest natural england methodology and natural enlgand calculator which factors this in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes. The proposed modification suggested fails to recognise that the Council is already taking account of the benefits of the LURA regulations in the calculations as the Natural England calculator is already taking account of the post-2030 TAL requirements within calculations.	No	
LPR094h	Environment	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469244	Policy	Policy ENV 11 Nutrient Neutrality		Support/Ob	Mandale Homes note the policy makes no reference to the required upgrading of water treatment facilities by 2030, as set out in the Levelling Up and Regeneration Act (LURA). This should be suitably acknowledged.	No reference to the required upgrading of water treatment facilities by 2030, as set out in the Levelling Up and Regeneration Act (LURA). This should be suitably acknowledged.	LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the natural england methodology which factors this is in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes.	No	
LPR095g	Environment	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppukltd.com	Policy	ENV11- Nutrient Neutrality (strategic)		Neutral	Draft Policy ENV11 requires development proposals resulting in a net increase in overnight accommodation which would increase the discharge of nitrogen into the River Tees catchment to achieve nutrient neutrality. It states that planning permission will only be granted where the integrity of the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar Site is not adversely affected by the proposed development and the requirements of the Conservation of Habitat and Species Regulations, including appropriate assessment have been satisfied. This draft requires the applicant to calculate the nutrient budget for their development. Suggested Modification The proposed inclusion of a policy requiring development proposals to achieve nutrient neutrality is not considered necessary or justified. Nutrient neutrality is already enforced by national planning policy and guidance. Additionally, the suggested wording does not allow the flexibility for any changes in government guidance on the matter, which may result in potential future conflicts.	Policy not considered necessary or justified. Not sufficient flexibility for any changes in government guidance.	The policy is required in order for the Local Plan to satisfy the Habitats Regulations Assessment requirements without this they wouldn't be the necessary certainty that the Local Plan could result in an adverse effect on the protected site. Reference is made to the Natural England methodology which will be updated to reflect wider policy and legislative changes referencing all of the current risks the policy becoming out of date should these be amended or updated. An amendment is proposed to acknowledge the policy will not apply should NN no longer be required to be demonstrated.	Yes	Add in 'unless Natural England have confirmed this is no longer required in the Tees Catchment' and reference to the NN calculator
LPR104t	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621235	Policy	Policy ENV11: Nutrient Neutrality (Strategic Policy)		Unknown	20.1 Taylor Wimpey understand the reasoning for the policy however understand that this needs to reflect updated national policy. Justification 20.2 The Council has introduced Policy ENV11 to reflect the requirement for nutrient neutrality, which has been in force since March 2022. While the inclusion of the policy is understood, it should also acknowledge the statutory requirement for the upgrading of wastewater treatment infrastructure by 2030, as set out in the Levelling Up and Regeneration Act 2023. This national intervention is intended to address the underlying causes of nutrient neutrality and will materially alter the policy context beyond 2030. Accordingly, Policy ENV11 will need to be sufficiently flexible to respond to these changes, in line with the 2024 National Planning Policy Framework's requirement for policies to remain effective and responsive over the plan period. Proposed Approach 20.3 To address the comments, the following approach is proposed: • Redraft policy to reflect national policy position.	While the inclusion of the policy is understood, it should also acknowledge the statutory requirement for the upgrading of wastewater treatment infrastructure by 2030, as set out in the Levelling Up and Regeneration Act 2023.	LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the natural england methodology which factors this is in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes.	No	
LPR105t	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621237	Policy	ENV11 - Nutrient Neutrality (Strategic Policy)		Neutral	Taylor Wimpey understand the reasoning for the policy however understand that this needs to reflect updated national policy. The Council has introduced Policy ENV11 to reflect the requirement for nutrient neutrality, which has been in force since March 2022. While the inclusion of the policy is understood, it should also acknowledge the statutory requirement for the upgrading of wastewater treatment infrastructure by 2030, as set out in the Levelling Up and Regeneration Act 2023. This national intervention is intended to address the underlying causes of nutrient neutrality and will materially alter the policy context beyond 2030. Accordingly, Policy ENV11 will need to be sufficiently flexible to respond to these changes, in line with the 2024 National Planning Policy Framework's requirement for policies to remain effective and responsive over the plan period. To address the comments, the following approach is proposed: • Redraft policy to reflect national policy position.	While the inclusion of the policy is understood, it should also acknowledge the statutory requirement for the upgrading of wastewater treatment infrastructure by 2030, as set out in the Levelling Up and Regeneration Act 2023.	LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the natural england methodology which factors this is in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes.	No	
LPR107h	Environment	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Policy	ENV11 - Nutrient Neutrality (Strategic Policy)		Neutral	We would suggest that this policy ought to include reference to the 2030 upgrades to waste water treatment facilities in line with the Levelling Up and Regeneration Act (1023) Schemes delivering units after this date will not be burdened by an outdated approach.	We would suggest that this policy ought to include reference to the 2030 upgrades to waste water treatment facilities in line with the Levelling Up and Regeneration Act (1023) Schemes delivering units after this date will not be burdened by an outdated approach.	LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the natural england methodology which factors this is in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes.	No	

LPR110a	Housing	James Seabury	Banks Group		Policy	ENV11 - Nutrient Neutrality (Strategic Policy)		Neutral	Whilst we acknowledge the need for a policy for nutrient neutrality, we believe the policy requires some amendments. There appears to be no reference to the requirement of the Levelling Up and Regeneration Act (2023) that specifies that wastewater treatment works must meet specified nutrient removal standards. In Darlington, Stressholme Sewage Treatment Works is listed by the government as a treatment works that must be upgraded to achieve a much reduced discharge limit. We suggest the following amends to the policy wording; Applicants will be required to calculate the nutrient budget of their development proposal following the Natural England methodology and taking into account the planned upgrades to treatment works from 2030.	Suggest the following amendment - Applicants will be required to calculate the nutrient budget of their development proposal following the Natural England methodology and taking into account the planned upgrades to treatment works from 2030.	LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the natural england methodology which factors this is in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes.	No	
LPR113 & 114q	Environment	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy	ENV11 – Nutrient Neutrality (strategic)		Support	Bellway broadly supports Policy ENV11 but request further detail is added to recognise national policy direction and allow flexibility over the longer term. Bellway support a clear policy direction for nutrient neutrality but wishes to highlight there is an inevitable cost to delivering the policy requirement which needs to be taken into account in the evidence base.In addition, Bellway advocate that ENV11 is amended to recognise the obligation on sewerage undertakers to upgrade infrastructure in sensitive catchment areas. Part 7 of the Levelling-up and Regeneration Act 2023 came into force on 26 December 2023 and introduced amendments to the Water Industry Act 1991 to impose obligations on sewerage undertakers in England to upgrade their infrastructure. Specifically, sewerage undertakers are obliged to upgrade nitrogen and/or phosphorus significant plant, being plant that discharges treated effluent into a nitrogen and/or phosphorus sensitive catchment area, in order to meet the relevant standard by the specified upgrade date. The obligations on the sewerage undertakers will reduce the impacts of nitrogen and phosphates on sensitive catchment areas which will inevitably reduce the need for developers to provide individual interventions. Bellway would also advocate for additional flexibility in the policy wording to allow developers to reassess should the circumstances change, for example if the national circumstances change again.	Cost needs to be taken in to account in the evidence base. advocate that ENV11 is amended to recognise the obligation on sewerage undertakers to upgrade infrastructure in sensitive catchment areas. Bellway would also advocate for additional flexibility in the policy wording to allow developers to reassess should the circumstances change, for example if the national circumstances change again	LURA regulations in relation wastewater treatment works are not referenced because this would be duplication and reference is made to calculating the nutrient budget using the natural england methodology which factors this is in. Making specific reference to other regulations and policies leaves the risk that the policy will become out of date should these be updated hence the more general reference to the Natural England methodology which will be updated to reflect any subsequent legislative changes. Viability Assessment factors in costs. An amendment is proposed to acknowledge the policy will not apply should NN no longer be required to be demonstrated.	Yes	Add in 'unless Natural England have confirmed this is no longer required in the Tees Catchment' and reference to the NN calculator
LPR115d	Environment	Emma Williams	Church Commisioners for England - Deloitte	Emma Williams, Deloitte,	Policy	ENV11 - Nutrient Neutrality (strategic)		Object	The Commissioners acknowledge the environmental imperative to address nutrient pollution within the River Tees catchment and support the overarching objective of Policy ENV11 to achieve nutrient neutrality. The Commissioners recognise the Council's duty to respond to the advice from Natural England regarding the potential impacts of development on designated Natura 2000 sites. The current policy places the burden of demonstrating nutrient neutrality directly on individual development proposals, which we do not support. There is a lack of clarity regarding the availability of suitable mitigation land or credits, the mechanisms for securing them, and the long-term management and monitoring responsibilities. To ensure the continued deliverability of allocated sites and to provide certainty for developers, the Commissioners urge the Council to develop and implement a strategic, borough-wide solution for nutrient neutrality. The Commissioners therefore consider the wording of the proposed policy should be reviewed in line with these comments to provide greater clarity on the Council's role and the implementation of a strategic, borough-wide solution for nutrient neutrality.	The current policy places the burden of demonstrating nutrient neutrality directly on individual development proposals, which we do not support. There is a lack of clarity regarding the availability of suitable mitigation land or credits, the mechanisms for securing them, and the long-term management and monitoring responsibilities. To ensure the continued deliverability of allocated sites and to provide certainty for developers, the Commissioners urge the Council to develop and implement a strategic, borough-wide solution for nutrient neutrality.	A strategic solution does exist in the Tees catchment through the Natural England Tees Catchment Nutrient Mitigation Scheme it is still however for individual development proposals to mitigate their impact by purchasing credits from the scheme or other private mitigation providers. Reference will made to the mitigation scheme and other options.	Yes	Reference to the Natural England mitigation scheme and further clarity on mitigation options and process
LPR125&126l	Environment	Josh White	Natural England		Policy	ENV11 - Nutrient Neutrality		Neutral	Natural England welcomes Policy ENV 11. Although not part of the policy wording, paragraph 9.9.9 makes reference to on-site mitigation utilising SuDS. We recommend that reference is made to SuDS being designed in accordance with CIRIA guidance documents C7533 and particularly C8154 to inform the design of treatment trains for nitrogen reduction in surface water runoff To address Nutrient Neutrality in the HRA, we advise a preliminary assessment of nutrient impacts on the Tees catchment resulting from this local plan is carried out. This could be done through a high level calculation of nutrient increase through increased wastewater based on housing allocation numbers. The expected increase of nutrients in the waste water can then be assessed against precautionary land use change uplifts from the allocations, as well as the mitigation potential in the wider Tees catchment from mitigation schemes run by Natural England, private parties, or . (see submission)	Natural England welcomes Policy ENV 11. Although not part of the policy wording, paragraph 9.9.9 makes reference to on-site mitigation utilising SuDS. We recommend that reference is made to SuDS being designed in accordance with CIRIA guidance documents C7533 and particularly C8154 to inform the design of treatment trains for nitrogen reduction in surface water runoff To address Nutrient Neutrality in the HRA, we advise a preliminary assessment of nutrient impacts on the Tees catchment resulting from this local plan is carried out.	Support noted. Reference added to CIRIA guidance and preliminary assessment will be completed to support HRA.	Yes	Reference to CIRIA guidance
LRP123n		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy	Burtree Employment Park (Policy E2)	ENV 11 – Nutrient Neutrality		The inclusion of this policy is necessary and a mitigation strategy has previously been established for Burtree Garden Village via use of the requisite nutrient budget calculation. This would be updated for later phases of the allocation, and it is anticipated that this does not present an impediment to delivery. Nonetheless, for clarity whilst the ability to utilise nutrient credits is covered in the supporting text at 9.9.9, it is unclear how this relates to criteria a-d) in the policy itself which is tailored to physical mitigation. Alternative wording may comprise the following for consistency: "Where mitigation is required (as an alternative to Tees Valley credit based mitigation), it will need to be satisfactorily demonstrated that this is: a. appropriate; b. sufficient to mitigate the identified impact; c. located in the Tees Catchment; and; d. secured in perpetuity along with the necessary management and monitoring measures"	for clarity whilst the ability to utilise nutrient credits is covered in the supporting text at 9.9.9, it is unclear how this relates to criteria a-d) in the policy itself which is tailored to physical mitigation. Alternative wording proposed	Point noted and amendment proposed to this section of policy to clarify	Yes	Amend policy to make clear the process for different mitigation options

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Se	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LPR032e	Transport and Infrastructure	Richard Cowen	CPRE Durham		Policy		IN1 – Delivering a Sustainable Transport Network (strategic)		Neutral	CPRE supports sustainable transport both for encouraging healthy active travel and combatting climate change. However, it must be safe and attractive if people are going to use it rather than their cars. While paragraph 10.3.6 of the text does mention "safe" routes to school, we see nothing in this policy to promote safe walking and cycling routes or how they are designed. There are government guidelines on this and we represent that the Plan should refer to these. (We note that "safe" and "attractive" are contained within Policy IN2; we represent these words should also be contained in this Policy.) This is particularly important given the amount of new development that is now allocated in Darlington and these developments should have properly designed routes that are safe and will attract new residents to use them. At present, there are few, if any, quiet routes that cross the A66 or A1. While we support moves to work with National Highways, we believe that this Policy should be considering the provision of things such as green bridges to help reconnect areas that may have been cut off by these major routes. We also note the reference in the Policy to a northern orbital route. CPRE has been concerned about such routes and has questioned their long-term ability to reduce traffic congestion and improve air quality. We do however appreciate that there is to be considerable new development that has already been allowed under the current Local Plan. We represent that any such orbital route should not encroach on countryside outside the areas already allocated for housing development and this should be made clear in the Policy.	General support but consider more detial is required on 'safe routes to schools'. Impact of strategic routes like the A1 and A66 also considerted a major obsticle.	There is the potential to add 'safe and attractive' to paragraph 10.3.6 as suggested. Policy IN 1 (section A iii) refers to improving local connections across busy transport corridors which act as a barrier to local access.This can be strengthened with additional wording about severance due to strategic infrastructure impacting on local access.	Yes	Add 'safe and attractive' to para 10.3.6 Add wording about 'severence caused by strategic infrastructure' to IN 1 Aiii
LPR049b	Transport and Infrastructure	Ken Maddison - sut	Resident		Policy		IN1 - Delivering a Sustainable Transport Network (strategic)		No answer	A ii and iv C iii under these sections I would like to suggest a couple areas that I think would assist congestion and greatly assist the road network. 1)A key strategic relief road that would eliminate and enhance the movement of vehicles across that part of the town, in the area of Brinkburn Road, Willow Road along with Whessoe Road. These areas regularly are plagued by bottlenecks at peak times due to the "cut" beneath the railway line and also the mini roundabout on Whessoe Road. The link road I am suggesting would join together the "blackpath" off West Auckland Road (near old railway bridge parapets) and join up with Elmtree Street off Whessoe Road . This road would clearly assist the flow of traffic across a very busy area of the town and would follow existing roads and use a already constructed railway bridge in Elmtree Road as well as following multiply parallel footpaths and cycle tracks which could all be incorporated into the new road. 2)Another relief road already within the plan but should be prioritised and linked to the planning approval before any houses are built in the same way as Burtree Garden Village is site 100 Stag Farm. The relief road most certainly should be a primary condition of the site and constructed before any houses are built, the road would tie into the new roundabout on Staindrop road and the constructed road within West Park. This would take away traffic congestion from Cockerton area and make the area much safer, I have got to say I think this would take away the need to change the roundabouts both a Cockerton and Carmel Road and by leaving them as they are would deter vehicles to use that route and take the western outer ring road as you have shown on your strategic road map. Specific Priorities Both of the two suggestions above should be included under the Specific Priorities C (vi) as this would enhance and enable the future plans suggested to be developed and partially resolve the increased traffic that is inevitable in a much less congested way for existing residents and road users. By doing this work significant hold up, congestion, danger and disruption would be avoided.	Suggestions are made for alternative mitigation options.	Impact on the highway network is to be tested through updated highway modelling work to see if the existing mitigations proposed remain sufficient.	No	
LPR074	Transport and Infrastructure	Leanne Carroll	Resident		Policy		IN1 – Delivering a Sustainable Transport Network (strategic)		Neutral	Policy IN1 C vi on page 168 - specific priorities for the highway network - did read: "Skerningham access roads - including local distributor road between the A167 and A1150 close to the Little Burdon roundabout in the broad location identified in the Skerningham Masterplan Framework." It now reads: "Skerningham link road between the A167 and A66." This sounds like the outcome of the recently released Options Assessment Report (OAR) for the DNLR dated April 2026 is a forgone conclusion and Route 2 will be taken forward. Pre-determination. Also the use of the word "link" again.	Questions over change in wording.	Having looked into this policy IN1 was consistent in reffering to all roads as 'link roads' we appreciate this differs from other references to 'Skerningham distributor road'. Alrerations to the wording have been propsed for clarity. It should be nothed thes changes also apply to the Burtree allocation.	Yes	
LPR087q	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN1 - Delivering a Sustainable Transport Network (Strategic Policy)		Neutral	Generally, our Client does not have any specific comments on Policy IN 1 as drafted, noting the requirement for Darlington Borough Council and applicants to work with National Highways "to ensure the existing route of the A1 and A66 is maintained and improved in order to maintain it's in line with its strategic function and enables residents and businesses to continue to benefit from good links to the strategic road network, with contributions sought from developers to a programme of highway improvements where applicable". That said, our Client notes that the list of strategic mitigation schemes in draft Policy IN 1 remains largely unchanged from the adopted plan to 2036. This suggest that the mitigation requirements for committed and allocated development to 2042 also remains as previously identified. This is re-iterated further in paragraph 10.5.18 (un-tracked version) noting that highways modelling was undertaken for allocations to 2036 which largely remain unaltered. It is also noted that this supporting text states that further work will be undertaken to understand the impact of the proposals in this plan review prior to submission. Our Client would welcome further discussions with officers on the nature of this work and its envisaged conclusions. Given our Client's allocated site is envisaged to deliver a substantial number of homes within and beyond the Local Plan Review period, our Client has concern that there is currently no understanding of the longer-term mitigation requirements beyond 2036 (or 2042) on both the local road network and the strategic road network via the A66. Our Client does accept that NPPF and associated planning guidance does encourage longer term planning for large strategic sites over 15 or 30 years, beyond the plan period for examination, with guidance recognising that there "may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced." Nonetheless, there does need to be an understanding of likely mitigation requirements and a reasonable prospect of delivery. It is recognised that our Client's site is noted in Policy IN1 to deliver the Burdon Hill link road connecting the A1150 to B6279 Tornado Way and a new link road to Red Hall. While the link road between the A1150 and B6279 is considered achievable, it is unclear where the link road to Red Hall is intended to be created, whether it is indeed evidenced as being necessary, and whether this is achievable. Our Client would welcome further clarification on these matters and in relation to the	Noteing that further work is required for the extended plan period.	Agreed and work will be comissioned. Once conclusions of modelling work are known wording may need to be altered.	No	

LPR104tu	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621236	Policy		Policy IN1: Delivering a Sustainable Transport Network (Strategic Policy)		Unknown	21.1 Taylor Wimpey Taylor Wimpey supports the principle of the policy; however, there are concerns that it is not underpinned by a sufficiently robust and up -to-date evidence base. In the absence of such evidence, it is unclear how the policy has informed the wider spatial strategy, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified, effective and deliverable. Justification 21.2 The proposed policy and wider spatial strategy are not underpinned by an up -to-date assessment of transport modelling for the borough. Reliance is placed on evidence prepared to support the adopted Local Plan, which no longer provides a sufficiently robust or current basis for decision-making. As a result, the evidence does not adequately reflect existing conditions or future growth assumptions, nor does it provide a sound foundation for identifying infrastructure requirements within the Infrastructure Delivery Plan. 21.3 In accordance with the 2024 National Planning Policy Framework, transport evidence should inform the spatial strategy through the testing of reasonable alternatives, including a broader range of potential housing allocation options. In the absence of such modelling, it is unclear how site selection decisions have been validated, raising concerns regarding whether the Plan is justified and effective. 21.4 Taylor Wimpey's site at Berrymead Farm, Darlington represents one such alternative that should be assessed as part of an updated transport evidence base. The site benefits from strong accessibility and functional connections to the main urban area of Darlington and should therefore be considered both for allocation and within any revised assessment of the highway network. Proposed Approach 21.1 To address the comments, the following approach is proposed: • Provide an up to date assessment of the transport modelling to provide a robust evidence base. • Consider further options of other sites within the transport modelling to meet increase housing and employment needs. • Allocation Taylor Wimpey site at Berrymead Farm, Darlington	Further evidence is required. The absence of this work makes it unclear how site selection has taken place.	It is noted further work need to be undertaken. However the housing sites proposed are either small in scale, located within sustainable locations or have been reallocated from other uses. It is therefore considered impact would be minimal. Additional employment land will also need testing.	No	
LPR105u	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621238	Policy		IN1 - Delivering a Sustainable Transport Network (Strategic Policy)		Neutral	Taylor Wimpey Taylor Wimpey supports the principle of the policy; however, there are concerns that it is not underpinned by a sufficiently robust and up -to-date evidence base. In the absence of such evidence, it is unclear how the policy has informed the wider spatial strategy, contrary to the 2024 National Planning Policy Framework's requirement for policies to be justified, effective and deliverable. The proposed policy and wider spatial strategy are not underpinned by an up -to-date assessment of transport modelling for the borough. Reliance is placed on evidence prepared to support the adopted Local Plan, which no longer provides a sufficiently robust or current basis for decision-making. As a result, the evidence does not adequately reflect existing conditions or future growth assumptions, nor does it provide a sound foundation for identifying infrastructure requirements within the Infrastructure Delivery Plan. 21.3 In accordance with the 2024 National Planning Policy Framework, transport evidence should inform the spatial strategy through the testing of reasonable alternatives, including a broader range of potential housing allocation options. In the absence of such modelling, it is unclear how site selection decisions have been validated, raising concerns regarding whether the Plan is justified and effective. 21.4 Taylor Wimpey's site at Coniscliffe Road, Darlington represents one such alternative that should be assessed as part of an updated transport evidence base. The site benefits from strong accessibility and functional connections to the main urban area of Darlington and should therefore be considered both for allocation and within any revised assessment of the highway network. To address the comments, the following approach is proposed: • Provide an up to date assessment of the transport modelling to provide a robust evidence base. • Consider further options of other sites within the transport modelling to meet increase housing and employment needs. • Allocation Taylor Wimpey site at Coniscliffe Road, Darlington	See comment LPR104tu above	See comment LPR104tu above	No	
LPR127, 128 & 129o	Transport and Infrastructure	Ros Kain	Historic England		Policy		IN1 - Delivering a Sustainable Transport Network (Strategic Policy)		Neutral	The text should be more specific to require delivery of the S&DR walking and cycling route. Suggested text (remove words in brackets): (Identification and development creation) Deliver a walking and cycling route in keeping with the original Stockton and Darlington Railway line as close as practicable.	Minor alteration of wording for greater clarity	No objection to incorporating this suggested wordingin IN 1 A) v	Yes	See suggestion.
LPR032f	Transport and Infrastructure	Richard Cowen	CPRE Durham		Policy		IN2 – Improving Access & Accessibility (strategic)		Support	Clearly, in view of our comments about this Policy in our comments on Policy IN1, we support this Policy, especially the reference to routes being both safe and attractive.	Support policy and the reference to routes being safe and attractive.	Support noted	No	N/A
LPR045	Transport and Infrastructure	Andrew Simmons	Resident		Policy		IN2 - Improving Access and Accessibility		Object	The only time it is safe for children to cross a busy road to get to and from school is if all traffic is stationary when they are crossing. My report entitled AUDIT OF PV2 ASSESSMENT FOR SCHOOL ROAD CROSSINGS first published in August 2025 and revised April 2026 identifies problems regarding walk routes to school. To ensure ambitions and objectives mentioned in the Darlington Local Plan Review Transport section are met the plan must include policy statements with more commitment, such as: •All roads that children have to cross to get to school will have crossing places risk assessed using assessment standards defined in Department for Education publication "Travel to school for children of compulsory school age – statutory guidance for local authorities" that is supported by Department for Transport method described in "Local Transport Note 1/95". •If roads are classified as difficult to cross provision will be made to stop traffic so that children can cross safely – for example traffic lights, zebra crossings or school crossing patrols.	Need to strengthen wording around safe routes to schools.	This report has been submitted to the Highway Authority previously and whilst they do not agree with the findings some additional modifications to the wording in the plan are suggested including in the education/school places section on safe routes to school. Plan viability work is being prepared.	Yes	In Policy IN 10 which covers the provision of new communtiy facilities (including schools) further clarification is proposed as to what constitutes good accessibility including a range of walking, cycling, public transport and parking facilities
LPR051n	Transport and Infrastructure	Chris Martin	HBF		Policy		IN2 - Improving Access and Accessibility		Neutral	This policy seeks to retain the requirement that 80% or more of dwellings on a site will be within a 400 metre walking distance of a bus stop served by a regular daytime service (at least every 30 minutes). Whilst the HBF can see the benefit of this approach in promoting sustainable travel, we consider such an approach is a blunt tool which can create a crude 'pass/fail' system for sites. Whilst the distance to bus stops is a useful indicator, the quality of the route is also important as this also effects how far a person is willing to walk. There is also no indication on how this is balanced with other sustainable forms of travel, as a site may exceed the 400 metre distance but provide excellent cycle and wheeling links. These points need clarifying within the policy. The Council has also sought to add in a per dwelling financial contribution towards improve-ments to the wider walking and cycling network. The Council will need to ensure that such a contribution passes the statutory tests found in Regulation 122(2) of the Community Infrastruc-ture Levy Regulations (2010) in that it is: •Necessary to make the development acceptable in planning terms. •Directly related to the development. •Fairly and reasonably related in scale and kind to the development. On this basis, the HBF considers that such a contribution is unlikely to apply to all development proposals and should in any event be tested in the whole plan viability assessment.	Concern that the 400m to a bus stop is too inflexible. Financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination. Plan viability work is being prepared.	No	

LPR059 & 60m	Transport and Infrastructure	Dominic Crowley	Lichfields		Policy		IN2 – Improving Access & Accessibility (strategic)		Object	Whilst within the adopted Local Plan, Hallam Land do not consider the retention of an arbitrary requirement for all new major development to be expected to ensure 80% or more of new dwellings be within a 400m walking distance of a bus stop to be appropriate. The policy should be reviewed to ensure sufficient flexibility to allow for appropriate consideration of wider sustainability and Active Travel measures incorporated within development proposals, as opposed to a simple pass/fail exercise based on a 400m distance. It is important the Council provide evidence to demonstrate that the new contributions they are seeking for walking and cycling network improvements (as per part f of Policy IN2) meet the relevant CIL tests.	Concern that the 400m to a bus stop is too inflexible. Financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination. Plan viability work is being prepared.	No	
LPR064 & 065q	Transport and Infrastructure	Nick Pleasant	Stantec on behalf of Vistry		Policy		IN2 - Improving Access and Accessibility (strategic)		Support	Vistry supports the intention of the amendments to Policy IN2, which seek to promote better connected and more accessible developments. However, the policy has insufficient regard to site specific characteristics and constraints. The requirement to seek fixed financial contributions towards wider walking and cycling network improvements is of significant concern regarding proportionality and evidential justification. The proposed per -dwelling charges do not reflect varying site circumstances or existing infrastructure provision and risk placing an unreasonable financial burden on development. It is also unclear how these contribution levels have been calculated. Vistry expects a robust evidence base is produced to underpin the policy, including a PPG compliant viability assessment demonstrating that the costs have been appropriately tested. In any event, greater flexibility will be required to ensure that such contributions do not undermine scheme viability or the delivery of development. See submitted attachment.	Financial contributions may not be required in all circumstances and this should be clarified.	The policy includes the wording 'where considered appropriate' which is considered sufficient. The inclusion of an/or necessary would also be accepatable.	Yes	Insert 'and/or necessary'
LPR087r	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN2 - Improving Access and Accessibility		Object	Generally, our Client supports the Council's intentions to improve access and connectivity throughout development sites to ensure existing and future residents benefit from active connections. That said, our Client has some concerns with the thresholds and methodologies to be implemented by the Council in order to achieve such goals. Firstly, it is recognised that the Council intend to carry forward the existing DBLP requirement that at least 80% of dwellings on a site are to be within 400m walking distance of a bus stop that is to be serviced by a regular daytime service of at least one bus every 30 minutes. Our Client understands Active Travel England's position on this matter whereby "most buildings within the application site should be within 400m of a high-frequency bus stop", as stated within their June 2024 Standing Advice Note. However, it appears that the Council has taken this advice and applied a fixed threshold, resulting in an overly prescriptive requirement for developers. Active Travel England's standing advice allows for a degree of flexibility in its expectations, and our Client would anticipate that the Council's approach would align accordingly. Similarly, the requirement for developers to ensure 80% of all dwellings on a site are within 400m walking distance of a bus stop does not capture the overall aims of draft Policy IN 2. It is understood that the Council's broader ambitions seek to promote accessibility and permeability for pedestrians, cyclists, and users of bus and rail services. While our Client recognises the importance of each mode of active travel, it is considered that these should be assessed holistically across a development site, with due regard to the full range of active travel measures proposed, rather than focusing solely on proximity to a single form of public transport. Secondly, and in relation to the same matter, our Client would remind the Council that any financial contributions sought to provide an extended bus service for up to 5 years, and bus stop infrastructure, will need to be demonstrably necessary to make the development acceptable. Specifically, they should ensure full alignment with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). The Council has now included reference to 'Walking and Cycling network improvements', with contributions sought for both residential and non-residential development. When focusing on residential development only, such contributions vary significantly from £300 to £1800 per dwelling	Concern that the 400m to a bus stop is too inflexible. There is no evidence of how the costings of finacial contributions have been arrived at nor tested for viability implications.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination. Plan viability work is being prepared.	No	
LPR092b	Transport and Infrastructure	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 07725970806	Policy		IN2 – Improving Access & Accessibility (strategic)		Object	Miller Homes object to criteria d. of this policy and the requirement for accessibility to be based on 80% or more of the site being within 400 metres walking distance of a bus stop. There is nothing in national planning policy to support this requirement. It is envisaged that the suggested 400m requirement has been obtained from the document entitled 'Guidelines for Planning for Public Transport in Developments' published in 1999 by the Institute of Highways and Transportation (IHT) where paragraph 6.20 states: "the maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m" However, it should be noted that the document also makes it clear that these walk distances are not fixed stating that: "These distances are quoted for guidance, and should not be followed slavishly if that would lead to complex or indirect bus routes". (paragraph 6.20, my underlining). "Bus stops should, ideally, be located to minimise walking distances, yet maximise the potential catchment areas" (paragraph 6.26). Furthermore, there appears to be no reference to any research or empirical evidence within 'Planning for Public Transport in Developments' to back up the suggestion that the maximum walk distance to a bus stop should be 400m and Miller Homes are not aware of any other document that does this. By contrast, another report published by the IHT in 2000, 'Guidelines for Providing for Journeys on Foot', does provide some empirical evidence stating that on average people are prepared to walk 1.0km (paragraph 3.30) and that this figure differs little by age or sex, remaining constant since 1975. In the same section of the document Table 3.2 goes on to suggest that the same 1.0km distance is an acceptable walking distance for commuters. In summary the two IHT documents do not appear to 'marry up'. The more recent document suggests	Concern that the 400m to a bus stop is too inflexible.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination.	No	

LPR094i	Transport and Infrastructure	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469245	Policy		Policy IN 2 Improving Access and Accessibility		Support/O	Mandale Homes object to criteria d of this policy and the requirement for accessibility to be based on 80% or more of the site being within 400 metres (m) walking distance of a bus stop. There is nothing in national planning policy to support this requirement and no empirical evidence to justify this stipulated distance. It is assumed that the suggested 400m requirement has been taken from the Guidelines for Planning for Public Transport in Developments published in 1999 by the Institute of Highways and Transportation (IHT) where paragraph 6.20 states: 'the maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m'. However, it should be noted that the document also makes it clear at paragraph 6.26 that these walking distances are not fixed stating that (underlined is ELG emphasis): 'These distances are quoted for guidance and should not be followed slavishly if that would lead to complex or indirect bus routes'. And 'Bus stops should, ideally, be located to minimise walking distances, yet maximise the potential catchment areas'. In contrast, a later report published by the IHT, in 2000, Guidelines for Providing for Journeys on Foot, does provide some empirical evidence stating that on average people are prepared to walk one kilometre (km) (paragraph 3.30) and that this figure differs little by age or sex, remaining constant since 1975. In the same section of the document Table 3.2 goes on to suggest that the same 1km distance is an acceptable walking distance for commuters, thus implying that people are prepared to walk greater distances to different land uses and their associated 'attractiveness'. In view of all the above, the 400m threshold proposed by the policy is inappropriate and inflexible and would not align with the NPPF. Indeed, it would not take into consideration the attractiveness of the	Concern that the 400m to a bus stop is too inflexible.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination.	No	
LPR102i	Transport and Infrastructure	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DL3 7EH	Policy		IN2 - Improving Access and Accessibility (Strategic Policy)		Object	This policy is seeking contributions from all developments for sustainable travel measures. The contributions for residential development are significant, ranging from £300 to £1,800 per dwelling, and it would appear that they would be applied on a blanket basis. However, there is no available evidence (e.g. Local Plan Viability Assessment) to support this policy, either in terms the justification for the contributions to be sought for all developments, or to understand its implications (alongside other requirements in the draft Local Plan) on viability. We therefore reserve our rights to comment in further detail on this critical matter at the next stage of consultation.	Financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	Plan viability work is being prepared.	No	
LPR104v	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621237	Policy		Policy IN2: Improving Access and Accessibility (Strategic Policy)		Unknown	22.1 Taylor Wimpey understands the objective of promoting sustainable transport; however, the proposed reliance on fixed walking distance thresholds to bus stops represents an inflexible approach which fails to adequately reflect site-specific circumstances. This risks undermining the Framework's requirement for policies to be sufficiently flexible and responsive to different local contexts. 22.2 Taylor Wimpey also has concerns regarding the proposed financial contributions towards the enhancement of the wider walking and cycling network. In particular, it is unclear how such contributions would consistently satisfy the statutory tests set out in the Community Infrastructure Levy Regulations 2010. 22.3 Furthermore, no evidence has been published to demonstrate that the proposed policy requirements have been subject to proportionate viability testing. In the absence of such evidence, the approach risks conflicting with the 2024 National Planning Policy Framework, which requires Local Plan policies to be deliverable and supported by a robust and up -to-date evidence base. Justification 22.4 This policy proposes to retain a requirement that 80% or more of dwellings on a site should be within a 400-metre walking distance of a bus stop served by a regular daytime service (at least every 30 minutes). Taylor Wimpey considers this to be an overly rigid criterion which risks creating a simplistic 'pass/fail' test for sites. While proximity to public transport is a relevant indicator of sustainability, the 2024 National Planning Policy Framework requires decision-making to be flexible and responsive to site-specific circumstances. In this regard, factors such as the quality, safety and attractiveness of walking routes, as well as the availability of other sustainable travel options, are also material considerations influencing travel behaviour. 22.5 The policy provides no clarity as to how compliance with the walking distance threshold would be balanced against strong cycling, wheeling or other sustainable transport connections where a site marginally exceeds the stated distance. In the absence of such clarification, the approach risks being insufficiently flexible and inconsistent with the Framework's emphasis on proportionate and effective policy application. 22.6 The Council also proposes a per-dwelling financial contribution towards improvements to the wider walking and cycling network. Any such requirement must be supported by evidence and	Concern that the 400m to a bus stop is too inflexible.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination.	No	
LPR105v	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621239	Policy		IN2 - Improving Access and Accessibility (Strategic Policy)		Neutral	Taylor Wimpey understands the objective of promoting sustainable transport; however, the proposed reliance on fixed walking distance thresholds to bus stops represents an inflexible approach which fails to adequately reflect site-specific circumstances. This risks undermining the Framework's requirement for policies to be sufficiently flexible and responsive to different local contexts. 22.2 Taylor Wimpey also has concerns regarding the proposed financial contributions towards the enhancement of the wider walking and cycling network. In particular, it is unclear how such contributions would consistently satisfy the statutory tests set out in the Community Infrastructure Levy Regulations 2010. 22.3 Furthermore, no evidence has been published to demonstrate that the proposed policy requirements have been subject to proportionate viability testing. In the absence of such evidence, the approach risks conflicting with the 2024 National Planning Policy Framework, which requires Local Plan policies to be deliverable and supported by a robust and up -to-date evidence base.This policy proposes to retain a requirement that 80% or more of dwellings on a site should be within a 400-metre walking distance of a bus stop served by a regular daytime service (at least every 30 minutes). Taylor Wimpey considers this to be an overly rigid criterion which risks creating a simplistic 'pass/fail' test for sites. While proximity to public transport is a relevant indicator of sustainability, the 2024 National Planning Policy Framework requires decision-making to be flexible and responsive to site-specific circumstances. In this regard, factors such as the quality, safety and attractiveness of walking routes, as well as the availability of other sustainable travel options, are also material considerations influencing travel behaviour. The policy provides no clarity as to how compliance with the walking distance threshold would be balanced against strong cycling, wheeling or other sustainable transport connections where a site marginally exceeds the stated distance. In the absence of such clarification, the approach risks being insufficiently flexible and inconsistent with the Framework's emphasis on proportionate and effective policy application. 22.6 The Council also proposes a per-dwelling financial contribution towards improvements to the wider walking and cycling network. Any such requirement must be supported by evidence and demonstrably comply with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, by being necessary to make the development acceptable in planning terms, directly related to the	Concern that the 400m to a bus stop is too inflexible.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination.	No	
LPR107i	Transport and Infrastructure	James Litherland	CityHeart	Jeremy Good, ELG Planning, DL3 7EH, '01325469236, jeremy@elgplanning.co.uk	Policy		IN2 - Improving Access and Accessibility (Strategic Policy)		Neutral	It would appear that this policy is being introduced without the benefit of an update Whole Plan Viability Assessment. Prior to that being undertaken it is unclear whether such a measure would impact on the deliverability of schemes in the town when taking account of new additional costs such as Nutrient Neutrality and Biodiversity Net Gain. With respect to Cityhearts interests, the level of contribution for those sites in the most sustainable locations, which already benefit from good access and accessibility, should be reconsidered and only introduced with the benefit of a full understanding on the viability of such schemes which are often in the most challenging areas to deliver viable schemes.	Additional contributions need to be tested in whole plan viability assessment.	Agreed. Plan viability work is being prepared.	No	

LPR111 & 112k	Transport and Infrastructure	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		IN2 - Improving Access and Accessibility (strategic)		Object	Broadly speaking, our Client supports the Council's intentions to improve access and connectivity throughout development sites to ensure existing and future residents benefit from active connections. Notwithstanding this, we note that additional policy wording has been inserted with reference to 'Walking and Cycling network improvements' within the draft policy, with financial contributions sought for both residential and non-residential development as part of the draft policy "where considered appropriate". Focusing on residential development, the proposed contributions vary significantly from £300 to £1,800 per dwelling depending on size and locational factors. There is no published evidence to demonstrate how these financial contributions have been calculated, and we would reiterate that the Council has not undertaken viability testing to inform this Local Plan Review Regulation 18 consultation. Noting that any contributions sought should be justified in line with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Therefore, in the absence of any such evidence, at this time Draft Policy IN 2 cannot be said to be justified, in accordance with paragraph 36 of the NPPF, and thus the soundness of the draft policy must be established through the provision of supporting evidence. Our Client reserves the right to comment further on Draft Policy IN 2, and any supporting evidence, during latter stages of the Local Plan Review process.	Financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	Agreed. Plan viability work is being prepared.	No	
LPR113 & 114r	Transport and Infrastructure	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		IN2 – Improving Access & Accessibility (strategic)		Neutral	Bellway supports the intention of the amendments to Policy IN2, which seek to promote better connected and more accessible developments. However, the policy appears to give insufficient regard to site specific characteristics and constraints. The requirement to seek fixed financial contributions towards wider walking and cycling network improvements is of significant concern regarding proportionality and evidential justification. The proposed per -dwelling charges do not reflect varying site circumstances or existing infrastructure provision and risk placing an unreasonable financial burden on development. It is also unclear how these contribution levels have been calculated. Bellway will therefore expect a robust evidence base is produced to underpin the policy, including a PPG compliant viability assessment demonstrating that the costs have been appropriately tested. In any event, greater flexibility will be required to ensure that such contributions do not undermine scheme viability or the delivery of development.	Financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	Agreed. Plan viability work is being prepared.	No	
LPR115e	Transport and Infrastructure	Emma Williams	Church Commisioners for England - Deloitte	Emma Williams, Deloitte,	Policy		IN2 - Improving Access and Accessibility (strategic)		Object	The Commissioners support the principle of improving access and connectivity. However, the Commissioners object to the proposed introduction of specific tariff-style contributions for sustainable travel measures, as detailed in the proposed policy. While the adopted Local Plan already seeks contributions for sustainable transport measures where appropriate, the introduction of specific tariff-style contributions per dwelling and per car parking space represents a new and additional cost burden on developments. These new costs, particularly when considered alongside other proposed policy changes that increase build costs and reduce scheme Gross Development Value, will have a significant adverse effect on scheme viability. The proposed contributions lack clear justification and supporting evidence regarding their calculation and viability. The Commissioners urge the Council Church Commissioners for England to undertake a comprehensive viability assessment of all new costs and policy requirements to ensure that the cumulative impact does not render allocated sites unviable for development. Any contributions sought must be justified in line with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) and demonstrate consistency with the NPPF's requirements for sound policy.	Object to the inclusion of a financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	Plan viability work is being prepared.	No	
LPR067 & 68m	Transport and Infrastructure	Georgina Cox	Gladman		Policy		IN2 - Improving Access and Accessibiity (strategic)		Neutral	Gladman support the need for schemes to be located sustainably where they are accessible to all. The policy seeks for 80% or more of schemes to be located within a 400-metre walking distance of a bus stop. This policy could become a constraint on many sites, and while the walking distance should be included as a material consideration in decision making, other factors also contribute to the level of sustainability of schemes, such as their proximity to a train station. The Council have sought to include a per dwelling financial contribution towards improvements to the wider walking and cycling network. The council will need to ensure that such a contribution passes the statutory tests found in Regulation 122(2) of the Community Infrastructure Levy Regulations (2010) to ensure the contributions are reasonable in terms of the scale of development and do not significantly affect the viability of schemes.	Concern that the 400m to a bus stop is too inflexible. The inclusion of a financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	ATE Guidance is all buildings should be within 400m so this is more flexible and we would consider some flexibility if a high frequency service was within 500m for example. A degree of flexibility will be afforded on a case by case basis considering other factors as appropriate, this was agreed in the previous local plan examination. Plan viability work is being prepared.	No	
LPR116g	Transport and Infrastructure	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		IN2 - Improving Access and Accessibility (strategic)		Object	Draft Policy IN2 now includes reference to 'Walking and Cycling network improvements' with contributions sought for both residential and non-residential development toward said infrastructure improvements. These contributions range from £300 to £1,800 per dwelling, depending on unit size and locational factors. Firstly, it is unclear how the Council has arrived at these figures, and what evidence exists to support the inclusion of the financial contributions for walking and cycling improvements, particularly when such provisions can often be delivered on a site-by-site basis through Section 106 obligations tailored to a Site's given context. Therefore, our Client cannot fully comment on the proposed revisions within Draft Policy IN2 until such information is made available. Furthermore, noting that Local Plan viability testing has yet to be undertaken (Paragraph 6.6.3 of the Regulation 18 document) it is unclear whether the Council has considered the viability implications of introducing this requirement for financial contributions.	Financial contribution towards sustainable transport will need to be justified and tested in whole plan viability work.	Plan viability work is being prepared.	No	
LPR051o	Transport and Infrastructure	Chris Martin	HBF		Policy		IN3 Transport Assessments and Travel Plans		Neutral	The Council has sought to include the following additional text: "Travel Plans must be prepared in line with the Council's latest Travel Plan Policy 2024 Docu-ment (or subsequent replacement)." As the Travel Plan Policy Document is not part of the development plan, it is not appropriate to require compliance with the document through Policy IN3 as to do so, effectively gives the doc-ument development plan weight when it has not undergone the same degree of scrutiny as a development plan document. As such, the HBF considers the wording should be amended to: "Travel Plans should have regard to the Council's latest Travel Plan Policy 2024 Document (or subsequent replacement)."	Suggested change of wording to 'have reguard to' the latest guidence on Travel Plans.	Wording to be changed to 'have regard to'	Yes	See suggested wording.
LPR087s	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN3 - Transport Assessments and Travel Plans (Strategic Policy)		Object	Draft Policy IN 3 generally carries over the adopted DBLP Policy IN 3; however, it is recognised that the Council have sought to add reference to their latest Travel Plan Policy 2024 Document, or subsequent replacement. Our Client has no concerns with the principal intentions of the Council to include reference to this document; however, there are some concerns that in its current form, the Policy is over-prescriptive given there is a definitive requirement to prepare a Travel Plan in line with the document. Our Client considers the Council should soften the wording of this requirement to include a mechanism that allows developers to take account of the Policy document instead.	Concern raised with prescriptive wording relating to travel plan guidence.	Wording to be changed to 'have regard to'	Yes	See suggested wording.
LPR067 & 68n	Transport and Infrastructure	Georgina Cox	Gladman		Policy		IN3 - Transport Assessments and Travel Plans		Neutral	The council directs travel plans to be prepared in line with the council's latest Travel Plan Policy 2024 Document, this document has not been examined alike the development plan. Policy IN3 effectively gives this document development plan weight, and instead Gladman considers the wording needs to be amended to: 'Travel Plans should have regard to the Council's latest Travel Plan Policy 2024 Document.'	Suggested change of wording to 'have reguard to' the latest guidence on Travel Plans.	Wording to be changed to 'have regard to'	Yes	Change wording to 'have regard to...'
LPR032g	Transport and Infrastructure	Richard Cowen	CPRE Durham		Policy		IN4 – Parking Provision including Electric Vehicle Charging		Support	Parking has to be considered in respect of all new development. We are pleased to see that this Policy considers cycle parking and changing facilities in new development, something which we believe is very important if people are to be encouraged to use active travel to commute to work or shop. We also support the inclusion of electric vehicle charging in this Policy	Support the consideration of cycling parking and changing facilities which are important to promote active travel. Support inclusion of EV charging.	Support noted	No	
LPR051p	Transport and Infrastructure	Chris Martin	HBF		Policy		IN4 - Parking provision including EVC		Neutral	This policy inter alia requires that new residential properties are required to provide suitable electric vehicle charging points. The Council will however no doubt be aware that the require-ment for electric vehicle charging points is contained in Part S of the building regulations. This is the national mandatory standard which the Government expects all new development to follow and as such, this part of Policy IN4 is superfluous and should be deleted.	Suggestion to delete the part of the policy relating to EV charging as this is now set out in Part S of building regulations.	The policy wording is more focued on giving thought to how charging facilites are provided and avoiding creating highway saftey concerns. It is not considered this dumplicates building regulations.	No	

LPR064 & 065r	Transport and Infrastructure	Nick Pleasant	Stantec on behalf of Vistry		Policy		IN4 - Parking Provision including Electric Vehicle Charging		Neutral	Vistry supports the principle of electric vehicle charging provision. However, the requirement for new residential development to provide EV charge points is already set out in Part S of the Building Regulations and secured through the building control process. As a result, the additional policy wording serves no purpose. The requirement should therefore be removed from the policy or amended to refer to compliance with Building Regulations in the interest of plan soundness.	Suggestion to delete the part of the policy relating to EV charging as this is now set out in Part S of building regulations.	The policy wording is more focued on giving thought to how charging facilites are provided and avoiding creating highway saftey concerns. It is not considered this dumplicates building regulations.	No				
LPR087t	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN4 - Parking Provision including Electric Vehicle Charging		Object	It is recognised that the Council have sought to include text within draft Policy IN 4 to ensure all residential and non-residential development provide suitable electric vehicle charging points. In this regard, Miller Homes offer Electric Vehicle charging points as standard with all their plots, as has become required through Building Regulations in 2022. As such, we would recommend the Council consider the inclusion of this text so not to duplicate the requirements set out under the Building Regulations.	Suggestion to delete the part of the policy relating to EV charging as this is now set out in Part S of building regulations.	The policy wording is more focued on giving thought to how charging facilites are provided and avoiding creating highway saftey concerns. It is not considered this dumplicates building regulations.	No				
LPR104w	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621238	Policy		Policy IN4: Parking Provision including Electric Vehicle Charging		Unknown	23.1 Taylor Wimpey do not consider that this policy is needed in the Plan as it repeats requirements set out in other legislation. Justification 23.2 The requirement for electric vehicle charging points is contained in Part S of the building regulations. This is the national mandatory standard which the Government expects all new development to follow and as such, this part of Policy IN4 is therefore not required and should be deleted to avoid duplication. Proposed Approach 23.3 To address the comments, the following approach is proposed: • Remove the policy to avoid duplication.	Suggestion to delete the part of the policy relating to EV charging as this is now set out in Part S of building regulations.	The policy wording is more focued on giving thought to how charging facilites are provided and avoiding creating highway saftey concerns. It is not considered this dumplicates building regulations.	No				
LPR105w	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621240	Policy		IN4 - Parking Provision incouding Electric Vehicle Charging		Neutral	Taylor Wimpey do not consider that this policy is needed in the Plan as it repeats requirements set out in other legislation. The requirement for electric vehicle charging points is contained in Part S of the building regulations. This is the national mandatory standard which the Government expects all new development to follow and as such, this part of Policy IN4 is therefore not required and should be deleted to avoid duplication. To address the comments, the following approach is proposed: • Remove the policy to avoid duplication.	Suggestion to delete the part of the policy relating to EV charging as this is now set out in Part S of building regulations.	The policy wording is more focued on giving thought to how charging facilites are provided and avoiding creating highway saftey concerns. It is not considered this dumplicates building regulations.	No				
LPR113 & 114s	Transport and Infrastructure	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		IN4 – Parking Provision including Electric Vehicle Charging		Neutral	Bellway supports the principle of electric vehicle charging provision. However, the requirement for new residential development to provide EV charge points is already set out in Part S of the Building Regulations3 and secured through the building control process. As a result, the additional policy wording serves no purpose. The requirement should therefore be removed from the policy or amended to refer to compliance with Building Regulations in the interest of plan soundness.	Suggestion to delete the part of the policy relating to EV charging as this is now set out in Part S of building regulations.	The policy wording is more focued on giving thought to how charging facilites are provided and avoiding creating highway saftey concerns. It is not considered this dumplicates building regulations.	No				
LPR051q	Transport and Infrastructure	Chris Martin	HBF		Policy		IN6 - Utilities infrastructure		Neutral	Policy IN6 requires that proposals for new development must be capable of being accommodated by existing or planned utilities. Whilst well intentioned, the HBF does not support this policy. Paragraph 201 of the NPPF is very clear that the focus of planning policies and decisions should be on whether proposed develop-ment is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate legislation). This policy appears to go over and above what planning should focus on and covers areas which are beyond the control of the development industry and instead are the responsibility of utility providers. If there are anticipated to be any issues with utilities provision over the plan period, these should be proactively addressed separately through the plan making process, rather than relying on Pol-icy INV6 which could instead stall and frustrate delivery.	Inclusion of a Utilities policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the utilities policy at present. This can be tested at examination.	No				
LPR059 & 60j	Transport and Infrastructure	Dominic Crowley	Lichfields		Policy		IN6 – Utilities Infrastructure (strategic)		Object	Hallam Land acknowledge that no amendments are proposed to the wording of Policy IN6 as part of this review. Hallam Land, however, wish to highlight issues encountered elsewhere in the country regarding utilities provision, particularly with respect to foul and surface water drainage, which may be of interest to the Council. We are now aware of a number of instances where planning policy considerations have overlapped with provisions made under separate legislation, which has in turn significantly frustrated and delayed the planning application determination process. In this respect, it is important that in reviewing the Local Plan, the Council are cognisant of the issues which have unfolded since the current Local Plan was adopted, and use the opportunity of the Local Plan review to amend Policy IN6 accordingly to ensure it is wholly aligned with the provisions of the NPPF, namely paragraph 201 which is explicit in stating: "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities." (our emphasis). We understand similar concerns have been raised by the Home Builders Federation (HBF) who are live to the implications such problems are causing for housing delivery across the country.	Inclusion of a Utilities policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the utilities policy at present. This can be tested at examination.	No				
LPR087u	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN6 - Utilities Infrastructure		Object	Draft Policy IN 6 is brought forward from the DBLP, with the Council offering no amendments. In this instance, our Client cannot support the retention of draft Policy IN 6 in its current form. This objection is on the basis that there is no formal requirement at planning policy level to duplicate pollution control regimes outside of the planning system, particularly in relation to foul sewage capacity. Indeed paragraph 201 of the NPPF makes very clear that "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively". In this regard, it is evident that Policy IN 6 creates unnecessary duplication, and subsequently conflicts with paragraph 16(f) of the NPPF, which requires plans, and by association the underpinning planning policies, to serve a clear purpose and avoid any such duplication.	Inclusion of a Utilities policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the utilities policy at present. This can be tested at examination.	No				
LPR116h	Transport and Infrastructure	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Policy		IN6 - Utilities Infrastructure (strategic)		Object	Our Client acknowledges that Policy IN6 is an existing policy within the adopted Local Plan, which is retained in full as part of the Local Plan Review Regulation 18 document. Policy IN6 requires proposals for new development to demonstrate that they are capable of being accommodated by existing or planning utilities infrastructure. NPPF Paragraph 201 states clearly that: "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively." On this basis, there is no formal requirement for planning policy at a local level to duplicate separate pollution control regimes outside of the planning system, particularly in relation to foul sewage capacity. Policy IN6 therefore creates unnecessary duplication, conflicting with NPPF Paragraph 16(f) which requires plans, and by association the underpinning planning policies, to serve a clear purpose and avoid any such duplication. To ensure compliance with NPPF Paragraphs 16(f), we would recommend that Policy IN6 is deleted.	Inclusion of a Utilities policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the utilities policy at present. This can be tested at examination.	No				
LPR067 & 68o	Transport and Infrastructure	Georgina Cox	Gladman		Policy		IN6 - Utilities Infrastructure		Neutral	Policy IN6 requires proposals for new developments must be capable of being accommodated by existing or planned utilities. Gladman considers the policy is in excess of what planning should focus on and consider this is the responsibility of utility providers, and so should be removed.	Inclusion of a Utilities policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the utilities policy at present. This can be tested at examination.	No				

LPR051r	Transport and Infrastructure	Chris Martin	HBF		Policy		IN8 - Broadband Infrastructure		Neutral	The HBF does not consider Policy IN8 to be needed. The requirement for broadband infrastruc-ture for new development is contained in Part R of the building regulations. These are the man-datory national standards provided by Government which all local planning authorities should follow and therefore this does not need to be included in the Local Plan Review.	Inclusion of a broadband policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the broadband policy at present. This can be tested at examination.	No					
LPR087v	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN8 - Broadband Infrastructure		Object	Our Client acknowledges the importance of providing broadband infrastructure and already delivers this as part of all new residential development, in accordance with the requirements of Part R of the Building Regulations introduced in 2022. In this context, our Client considers the retention of draft Policy IN 8 to represent unnecessary duplication, contrary to paragraph 16 of the NPPF.	Inclusion of a broadband policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the broadband policy at present. This can be tested at examination.	No					
LPR104ty	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621240	Policy		Policy IN8: Broadband Infrastructure (Strategic Policy)		Unknown	24.1 Taylor Wimpey do not consider that this policy is needed in the Plan as it repeats requirements set out in other legislation. Justification 24.2 The requirement for broadband infrastructure for new development is contained in Part R of the building regulations. These are the mandatory national standards provided by Government which all local planning authorities should follow and therefore this does not need to be included in the Local Plan Review. Proposed Approach 24.3 To address the comments, the following approach is proposed: • Remove the policy to avoid duplication.	Inclusion of a broadband policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the broadband policy at present. This can be tested at examination.	No					
LPR067 & 68p	Transport and Infrastructure	Georgina Cox	Gladman		Policy		IN8 - Broadband Infrastructure		Neutral	Policy IN8 is not required as it's a requirement which is included in Part R of the building regulations. These are mandatory national standards which all local planning authorities should follow and so do not need to be included within the development plan documents.	Inclusion of a broadband policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the broadband policy at present. This can be tested at examination.	No					
LPR105x	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621241	Policy		IN8 - Broadband Infrastructure (Strategic Policy)		Neutral	Taylor Wimpey do not consider that this policy is needed in the Plan as it repeats requirements set out in other legislation. The requirement for broadband infrastructure for new development is contained in Part R of the building regulations. These are the mandatory national standards provided by Government which all local planning authorities should follow and therefore this does not need to be included in the Local Plan Review. To address the comments, the following approach is proposed: • Remove the policy to avoid duplication.	Inclusion of a broadband policy is not considered necessary as it considered to be cosidered sufficiently in other processes and legislation.	For completeness we propose to retain the broadband policy at present. This can be tested at examination.	No					
LPR032h	Transport and Infrastructure	Richard Cowen	CPRE Durham		Policy		IN9 – Renewable Energy Infrastructure (strategic)		Neutral	While CPRE supports renewable energy, we have concerns about this Policy as drafted. There are already wind farms within the Borough and neighbouring areas. They have a dominant impact on the area and the places where large turbines can be placed are limited, especially if turbines up to 200 metres tall are used. We represent that the Policy should 1) consider turbine size and whether large turbines should not be permitted in certain areas while smaller turbines could be 2) include residential amenity, including noise (as well as shadow flicker) Large areas of the Borough have now been given permission for solar arrays, including the National Infrastructure Project at Byers Gill that will occupy a significant area of land to the north of Darlington. We represent that the Policy should refer to this and include a criterion relating to the cumulative effect with existing or permitted sites. Further, we represent that the Policy should encourage solar panels on roofs, especially large commercial buildings. We note there is no reference in this policy to anaerobic digesters. Is this deliberate?	Comment raises a range of points which the policy is not considered to currently address including height of turbines, residential amenity, noise, cumulative effects of solar, solar panels on roofs and anaerobic digestors.	No detailed assessment has taken place regarding the size of turbines that could be accommodated within different parts of the Borough so it would be difficult to justify a policy of this nature without such an assessment. It is considered the policy is sufficiently robust to enable this to be assessed at the application stage by assessing the impact including cumulatively upon visual dominance and landscape character and fabric. It is proposed to include reference to residential amenity including noise within the policy. A reference to cumulative effect in relation to solar proposals will also be added. Solar panels are encouraged on roofs through the Climate Change policy. The lack of reference to anaerobic digestors is not deliberate as proposals for these can be considered through the application of other policies.	Yes	Policy IN9 a i. - amend to residential amenity including shadow flicker and noise. Policy IN9 b vi. - amend to the proposal has adequately mitigated the individual and cumulative visual impact on the landscape and the effect of glint and glare on neighbouring uses and aircraft safety.			
LPR033b	Transport and Infrastructure	Richard Cowen	Durham Bird Club		Policy		IN9 – Renewable Energy Infrastructure (strategic)		Neutral	We are pleased to see that protected species and habitats are specified in relation to wind turbines. However, there is no similar provision in relation to solar arrays. While the Club takes a neutral position on this subject, we are concerned that there is evidence that solar arrays can appear as water features, especially in poor light, and so potentially induce waterfowl or waders to land there. We therefore represent that solar arrays should avoid areas close to water features. In addition, solar arrays should be subject to a monitoring condition to determine whether waterfowl are in fact attracted to them leading to injury or death to the birds (and damage to any panels struck). Information we have received from the British Trust for Ornithology states that there is insufficient evidence, one way or the other, in respect of this and so such evidence should help determine future suitable sites for solar arrays from a bird point of view. It is accepted that there is evidence that farmland species may benefit from solar arrays because of the hedges etc that are included in proposals but this does not affect issues relating to water species.	No reference to protected species and habitats in relation to wind turbines. Evidence the solar can appear as water features so should avoid solar arrays close to water features. Monitoring condition required to determine if waterfowl are attracted. Evidence fron BTO still uncertain on this issue. Farmland species may benefit from solar array proposals.	The Local Plan should be read as a whole. Policies ENV7 and ENV8 would be applied to any solar proposals so this will ensure impact on protected species and habitats such as birds is considered.	No					
LPR033c	Transport and Infrastructure	Richard Cowen	Durham Bird Club		Policy		IN9 – Renewable Energy Infrastructure (strategic)		Neutral	In addition to Anaerobic Digestors, this Policy does not cover Battery Energy Storage Systems. These are now either part of an application for a solar array or just for the BESS itself. Given public concerns about these and fire issues that may result from them, should there not also be a policy to address how such applications will be considered?	Policy should be expanded to cover battery storage uses.	A section will be added to the policy covering BESS.	Yes	Additional wording on BESS.			
LPR087w	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		Policy IN10 - Supporting the Delivery of Community and Social Infrastructure		Object	While much of draft Policy IN 10 is retained from the adopted DBLP, it is noted by our Client that the Council have sought to add an additional requirement to ensure development contributes towards 'Health Contributions for GP Provision' In principle, our Client does not object to ensuring that health facilities within the Borough are able to meet the needs of residents; however, as currently drafted, there are a number of elements within the Policy that are either unsupported by evidence or overly rigid. Firstly, our Client questions the basis on which the Council has established a threshold requiring contributions from developments comprising 20 dwellings or more. Whilst it is acknowledged that the nature and scale of our Client's allocated site exceeds this threshold, our Client maintains that any threshold applied by the Council must be robustly justified by supporting evidence. This position reflects the requirements of national policy, as set out at paragraph 36(b) of the NPPF. Secondly, and to reiterate, our Client would remind the Council that any financial contributions in this regard could be bespoke to each individual scheme, and considered on a site-by-site basis. As such, the wording of Policy IN 10 should allow for the submission of a site-specific viability assessment, where such infrastrcuture requirements would impact the general viability of a site. This would be particularly more pressing in regard to our Client's site, which is allocated for residential development at Policy H 2. Our Client would also reiterate to the Council that any contributions sought should be in full alignment with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).	Further clarification is needed on the proposed 20 dwellings or more threshold for health contributions. All financial contributions should be considered on a site-by-site basis and subject to viability testing.	Further work will be undertaken to clarify thresholds but also test the overall plan viability prior to submission.	To be determined .					

LPR039	Transport and Infrastructure	Sophie Colella			Policy		IN10 – Supporting the Delivery of Community & Social Infrastructure (strategic)		Object	The Local Plan recognises the importance of supporting infrastructure such as GP provision and school places alongside housing growth, and sets out mechanisms for securing developer contributions where capacity is exceeded. However, it is not clear how this will translate into timely and guaranteed delivery in practice. The approach appears to rely on future coordination with external providers and the use of planning obligations, rather than clearly defined triggers or commitments to ensure infrastructure is in place at the point it is needed. Given the scale of proposed development, there is a risk that existing GP practices and schools will experience increased pressure in the early phases of delivery, before mitigation measures are implemented. It would therefore be helpful for the Plan to provide greater clarity on how infrastructure delivery will be phased alongside development, and how delays in provision will be mitigated to avoid impacts on existing communities.	Concern raised over ability of policy to secure health infrastructure in a timely fashion. Especially as it is dependent on external factors.	Provision of helth facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and ecourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all cicumstances.	No	
LPR051s	Transport and Infrastructure	Chris Martin	HBF		Policy		IN10 - Supporting the Delivery of Community and Social Infrastructure		Neutral	The Council has chosen to add a requirement for development to contribute towards the physical expansion of GP practices in instances where sufficient capacity does not exist. The HBF accepts the principle of this approach provided it adheres to the aforementioned statutory tests for plan-ning obligations contained in Regulation 122(2) of the Community Infrastructure Levy Regula-tions (2010). This cost will also need to be accurately reflected in the whole plan viability assess-ment. The HBF also considers that the policy would benefit from allowing applicants to submit a site-specific viability assessment where such infrastructure requirements would affect the delivera-bility of a site. This would allow discussions with the Council to explore how such requirements can then be accommodated (eg. by looking at phasing of provision or payments).	Principle of seeking contributions towards expansion of GP services accepted. Seeking flexibility for site specific viability asessments to ensure deliverability isn't affected.	Provision of helth facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and ecourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all cicumstances.	No	
LPR064 & 065s	Transport and Infrastructure	Nick Pleasant	Stantec on behalf of Vistry		Policy		IN10 - Supporting the delivery of Community and Social Infrastructure (strategic)		Neutral	Vistry acknowledges the proposed methodology for calculating Health Contributions for GP provision is logical in structure. However, the formula relies heavily on a number of variable assumptions such as household occupancy rates, space standards and premises costs. These are not set out within the policy and although reference is made to a separate guidance note, there is insufficient clarity as to how these inputs have been calculated, how often they will be updated or whether they have been tested through a PPG compliant viability assessment. The policy does also not outline whether flexibility will be applied where cumulative policy costs risk undermining deliverability. Vistry therefore believes robust evidence needs to be produced which provides clarity and viability safeguards to ensure the health contributions are proportionate and justified.	Further clarity is required on all of the variables that go into the health contributions formula. Robust evidence is required to demostrate additional contributions do not adversely impact delivery.	Provision of helth facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and ecourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all cicumstances. A viability assessment is being produced to test the impcat of contributions.	No	
LPR113 & 114t	Transport and Infrastructure	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Policy		IN10 – Supporting the Delivery of Community & Social Infrastructure (strategic)		Neutral	Bellway acknowledge the proposed methodology for calculating Health Contributions for GP provision is logical in structure. However, the formula relies heavily on a number of variable assumptions such as household occupancy rates, space standards and premises costs. These are not set out within the policy and although reference is made to a separate guidance note, there is insufficient clarity as to how these inputs have been calculated, how often they will be updated or whether they have been tested through a PPG compliant viability assessment. The policy does also not outline whether flexibility will be applied where cumulative policy costs risk undermining deliverability. Bellway therefore believes robust evidence needs to be produced which provides clarity and viability safeguards to ensure the health contributions are proportionate and justified.	Concern raised about the number of variables in the health contributions policy not set out in the document. Needs to be tested for viability.	Provision of helth facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and ecourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all cicumstances. A viability assessment is being produced to test the impcat of contributions.	No	
LPR117b	Transport and Infrastructure	James Beackon	NHS Property Services		Policy		IN10 – Supporting the Delivery of Community & Social Infrastructure (strategic)		Neutral	Health Contributions for GP Provision Draft Policy IN 10 sets out the overarching policy for ensuring development contributes appropriately to the physical expansion of existing GP practices to meet the additional need generated by proposals. This is supported by the methodology in supporting paragraph 10.11.7. NHSPS welcome the acknowledgement of healthcare as necessary infrastructure to support housing growth (supporting paragraph 10.11.6), and support continued engagement with the ICB in the identification and implementation of suitable forms of mitigation to ensure the NHS can continue to provide the required healthcare service provision and in the preparation of the supporting evidence base, including the Infrastructure Delivery Plan (IDP). Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. Protection of Existing Community Facilities Part C of Draft Policy IN10 also focuses on the loss of existing community facilities, which includes health as confirmed by Policy HC1, which will be permitted where (ii.) it can be demonstrated that the community facility is no longer needed. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form. It is noted that paragraph 10.11.16 requires the loss of a community facility to extensively evidence that there is no accessible alternative suitable facility where it is the only remaining facility in a community. The approach taken in supporting paragraph 10.11.16 does not reflect the approach taken in Part C of Draft Policy IN10, which suggests that fulfilling an individual Criterion would satisfy the loss of an existing community facility. Where healthcare facilities are included within the Local's Plan definition of community facilities,	General support for seeking contributions towards healthcare provision. A flexible approach is proposed in order to meet needs this could include contributions towards extensions or modifications to existing facilities, land or the construction of new facilities. Acknowledgement that there will need to be ongoing dialogue beween the NHS and Council. A proposed modification is suggested to the supporting text of IN 10 to better clarify when NHS facilities may longer be needed.	The council is looking to apply a flexible approach to implementation. Some sites may look to deliver structures or land others may soley rely on contributions. Some may be a combination. This will be considered at the time of determination with advice from relevant professional health bodies. The proposed modification to para 10.11.16 will be applied.	Yes	Proposed Modification to Supporting Paragraph 10.11.16: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will satisfy the requirement under Part C of Policy IN10.
LPR123a	Transport and Infrastructure	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		H11 – Burtree Garden Village – Site Allocation (strategic)		Support	Its purpose is to support the Local Plan representation by considering the likely impacts of Phase 2 on the local highway network, the strategic road network and the wider movement strategy for Burtree Garden Village. Please see document attached.	General support for Burtree Allocation	Support noted	No	
LPR044f	Transport and Infrastructure	Vanessa			Section			10. Transport and infrastructure	Object	Sustainable Transport Networks are moved from policy IN1 a) iii) into IN2. The wording must not change, to ensure permeability by active travel so it's the default. Developers must by default be required to provide or contribute funding to active travel routes to connect the development to local shops, services & town centre. Blue infrastructure routes (along rivers) cannot count as commuter active travel routes, as many flood, so are unusable in wet weather. Access, lighting, surfacing and gritting standards for commuter routes should be developed and included.	It is proposed to move Sustainable Transport Networks from Policy IN 1 to IN 2. Developers should be paying towards active travel routes. River corridors should not be counted as commuter active travel routes as many ar impacted by flooding.	We consider the Sustainable Transport Networks element of the policy is in the right place in the opening strategic policy. It's location is however secondary to it's detail and meaning as the plan should be read as a whole. Developer contributions are being sought towards sustainable transport (including the improvment of routes). River corridors do serve a key finction in the sustainable transport network. Contributions could be used to rectify some local flooding impacts.	No	

LPR044j	Transport and Infrastructure	Vanessa			Section			10. Transport and infrastructure	Object	"Darlington Northern Link Road (DNLR) It is unsuitable to put a bypass through a new housing estate for resident health and wellbeing, and incompatible with requirements for the local distributor road in the Skerningham Garden Village (GV) Design Code. I object to removal of statement that Skerningham GV can be delivered irrespective of DNLR route. Its route impacts everything, so must be set before planning permits. The original DNLR route must stay safeguarded until the route is decided. Viability: the original cost £40m, now £140m, so viability needs reassessing. Land beyond the road must remain protected for nutrient neutrality (NN) and Biodiversity Net Gain (BNG) for the required 30yrs, not used for more housing. Object to wording change from local distributor road to link road. Policy H10, points f) and g) still state the former. This should stay, and all other mentions realigned. Mismatch of Policy H10, point g) ii) with Masterplan. A167 to East Coast Mainline (ECML) connection must be delivered after 450 homes on this site. DNLR options appraisal misses directing HGVs on existing A19 and A689 route - no new road required, so much cheaper & less environmentally damaging. "	Objection to the removel of the reference to the interdependance of the Darlington Northern Link Road and the Skerningham allocation.	The Darlington Northern Link Road proposal is being led by TVCA. It is still at the early stages of feasibility the Skerningham allocation is not dependent on the progress of the Northern Link Road. This will be revisited in subsequent reviews of the plan. This comment has been dealt with in more detail in the 'Skerningham' section.	No	
LPR036	Transport and Infrastructure	Suzy Hill	Darlington Library		Section			10. Transport and infrastructure	Neutral	I'd just like to offer some information about our library service in Darlington. In section 9.17 it names the library as Crown Street Library. The name is Darlington Library - can this be altered please in the final version. I also note our libraries are not mentioned under Arts and Cultural Facilities, where the Hippodrome, Hopetown, Art Gallery feature. Can provision of the statutory library service be included please? Suggest... Darlington's Central Library has recently benefited from a £3.7 million restoration and refurbishment, delivering significant improvements that support and enhance STEM learning. This investment has been further recognised through the library's inclusion in the Libraries Development Framework, highlighting its success and strategic impact. Across both libraries, Darlington residents are offered a wide range of high-quality reading, learning, digital, and cultural experiences.	References to Crown Street Library should be changed to 'Darlington Library'.	Change to be made.	Yes	References to Crown Street Library should be changed to 'Darlington Library' and include in list of 'Arts and Cultural facilities'
LPR053b	Transport and Infrastructure	Patricia Meredith	Resident		Section			10. Transport and infrastructure		Land allocated for services is too often undelivered. The Plan must include mechanisms—such as developer contributions—to guarantee delivery. Neighbourhood Forums should/could help manage community green spaces and avoid problematic leasehold arrangements. Developers must contribute to active travel links; riverside "blue routes" cannot be counted as commuter routes due to flooding.	Concern over non-delivery of infrastructure.	The local plan does contain mechanisms to secure contributions for infrastructure. These are considered on an application by application basis and typically stipulated in legal agreement should permission be granted.	No	
LPR053f	Transport and Infrastructure	Patricia Meredith	Resident		Section			10. Transport and infrastructure	Object	The proposed approach to the DNLR remains unsound. Routing a bypass through new housing is incompatible with resident health and wellbeing and contradicts the Skerningham Garden Village (GV) Design Code. The Plan must retain the statement that Skerningham GV cannot and must not proceed until the DNLR route is fixed. The original safeguarded route must remain in place until a final decision is made. With costs rising from £40m to £140m, a full viability reassessment is essential. Land beyond the DNLR must remain protected for 30 year nutrient neutrality (NN) and Biodiversity Net Gain (BNG) commitments. I strongly object to the wording change from "local distributor road" to "link road", as Policy H10 continues to rely on the former. The DNLR appraisal also fails to consider the cheaper, lower impact A19/A689 HGV alternative. Why is this?	The approach to the Darlington Northern Link Road is not considered appropriate. The original safeguarded route should remain in place. Objection to the use of the wording 'local distributor road' and 'link road'.	The wider alignment to the north of Skerningham was not safeguarded in the adopted plan. Minor changes are proposed to esure the highway mitigations are referenced consistently. The DNLR Appraisal is produced by the Combined Authority.	Yes	Consisntency of wording re Skerningham link road/distributor road has been updated.
LPR054	Transport and Infrastructure	Ken Maddison	Resident		Section			10. Transport and infrastructure	Object	In the section Utilities under paragraph 10.10.5 regarding infrastructure capacity. I am very interested in how you have written the fact that Stressholme Sewage Treatment works has sufficient capacity for the plan`s delivery of around 9000 extra houses along with a number of commercial and Industrial business for the period. I assume, as you have eluded too you have made contact with NWL and they are in agreement with this statement? You will be aware NWL have publicly said back in early 2024 that Stressholme is 96% full and only has extra capacity to handle another 6,010 people or 2,500 houses. The current companies business plan specifically due to Nutrient Neutrality are only dealing with the Phosphorus element between 2025 and 2030 to comply with the NN, nothing for increased capacity at the treatment works until their next business plan which would run from 2030 and 2040 if approved. If the Local Plan delivery remains as it is, then Stressholme is already at capacity and simply the network will be backed up from the works and will be overflowing into the Skerne more often. Based on this, a detailed dovetailed plan will be required to match the annual delivery of new developments and NWL capital programme otherwise it would be the Skerne that will be paying the price and DBC do have an obligation under the WFD to ensure watercourses are improved. Maybe this section requires much more attention and is fully endorsed and documented in the review from NWL	Objection raised to the percieved lack of sewage capacity within the borough.	A detailed consultation response has been received from Northumbrian Water Limited (LPR 133). No objection is raised at this stage and NWL will continue to be consultees on major applications.	No	
LPR069	Transport and Infrastructure	Jude Murray	Resident		Section			10. Transport and infrastructure	Object	"As per the Planning Inspector's comments regarding the 2016-2036 Local Plan, it should be made clear that the Local Plan is not reliant on the Darlington Northern Link Road (DNLR) Para 10.5.9 – I strongly object to the removal of the wording that the local Plan is not reliant on the DNLR. Removing it suggests that the revised Plan is reliant on this road. The DNLR will have a major impact on Policy H10 Skerningham Site Allocation. The route for the DNLR must therefore be decided prior to any planning applications for the Skerningham Garden Village being approved."	Objection to the removal of the wording in para 10.5.9.	The removal of this wording was more to do with the fact the options for the road has been revisited. Therefore the route may not connect directly to the A66 for example.	No	
LPR074a	Transport and Infrastructure	Leanne Carroll	Resident		Section			10. Transport and infrastructure	Neutral	10.5.9 on page 179 says: "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." This bit has been removed: "The Local Plan is not reliant on the delivery of this route…" Is the Local Plan now reliant on the delivery of the DNLR and more crucially is Skerningham now reliant on the delivery of the DNLR? If so, this needs to be written into Policy H10.	Objection to the removal of the wording in para 10.5.9.	The removal of this wording ws more to do with the fact the options for the road has been revisited. Therefore the route may not connect directly to the A66 for example.	No	
LPR076	Transport and Infrastructure	Ruairi Feakes	Durham Policy and Crime Commissioners Office		Section			10. Transport and infrastructure	Support	2. Developer Contributions and Funding for Policing The PCC supports the inclusion of clear policy mechanisms within the Local Plan to secure developer contributions towards policing infrastructure and operational needs where development creates additional demand. The PCC recommends that: • Section 106 agreements and/or the Community Infrastructure Levy (CIL) are explicitly framed to allow contributions towards policing and community safety infrastructure where justified. • Contributions may support: o Police estate and facilities. o Technology and equipment. o Neighbourhood policing capacity in areas of significant growth. • The Local Plan recognises policing as essential infrastructure, alongside health, education, and transport. This approach will help ensure that new developments are sustainable and do not adversely impact existing communities.	Developer contributions should be sought towards policing.	At present we are not looking to seek contributions towards policing.	No	

LPR076a	Transport and Infrastructure	Ruairi Feakes	Durham Policy and Crime Commissioners Office		Section			10. Transport and infrastructure	Support	3. Designing In Community Safety and Crime Prevention The PCC strongly supports policies that promote secure by design principles and crime prevention through environmental design (CPTED). The Draft Local Plan should: • Embed community safety considerations across all relevant policies. • Encourage early consultation with Durham Constabulary's Designing Out Crime Officers. • Promote: o Well-designed public spaces. o Appropriate lighting, layout, and natural surveillance. o Safe transport hubs and routes. • Ensure that town centre regeneration and nighttime economy proposals fully address safety, antisocial behaviour, and violence reduction. Designing in safety at the earliest stages can significantly reduce crime, antisocial behaviour, and long-term policing demand.	Support for approach to design and in particular public transport hubs.	Support noted	No	
LPR078	Transport and Infrastructure	Matt Verlander	Avison Young for National Gas		Section			10. Transport and infrastructure	Neutral	Provides guidance in relation to notifying National Gas see submission and asset map.	More of a signpost to find information than a representation.	Noted	No	
LPR081c	Transport and Infrastructure	J Murray	Secretary - Whinfield Residents Association inc Friends of Beech Wood		Section			10. Transport and infrastructure	Object	Para 10.5.9 – we strongly object to the removing of the wording that the Local Plan is not reliant on the Darlington Northern Link Road (DNLR). As per the Planning Inspector's recommendation in the 2016-2036 Local Plan, it should be made clear that the Local Plan is not reliant on the DNLR. Para 10.5.9 – we strongly object to the suggestion that the Local Plan is now reliant on the delivery of the DNLR. This should not be the case. Para 10.5.9 – if the wording regarding the DNLR is to remain then its route impacts on everything, especially Policy H10 Skerningham Site Allocation. The route for the DNLR must therefore be set prior to any planning applications for Skerningham being approved.	Objection to the removal of the wording in para 10.5.9.	The removal of this wording ws more to do with the fact the options for the road has been revisited. Therefore the route may not connect directly to the A66 for example.	No	
LPR084a	Transport and Infrastructure	Tony Gillam	Resident		Section			10. Transport and infrastructure	Object	Infrastructure, Services & Transport Land allocated for services is too often undelivered. The Plan must include mechanisms—such as developer contributions—to guarantee delivery. Neighbourhood Forums could help manage community green spaces and avoid problematic leasehold arrangements. Developments near high pressure traffic areas require modelling and early parking controls. Travel plans should be mandatory for developments over 10 homes, with escrow payments to Modeshift to ensure implementation. Developers must contribute to active travel links; riverside "blue routes" cannot be counted as commuter routes due to flooding.	Concern over non-delivery of infrastructure.	The local plan does contain mechanisms to secure contributions for infrastructure. These are considered on an application by application basis and typically stipulated in legal agreement should permission be granted.	No	
LPR084d	Transport and Infrastructure	Tony Gillam	Resident		Section			10. Transport and infrastructure	Object	Sewage & Wastewater The Plan does not adequately address sewer and treatment capacity constraints. This omission is not credible given national scrutiny. The council must demonstrate how Water Framework Directive obligations will be met. Evidence is required of Northumbrian Water's upgrade plans, including South Park CSO and Stressholme (2030–40). Baseline water and sewerage policies must apply to all developments, not only those over 100 homes.	Objection raised to the percieved lack of sewage capacity within the borough.	A detailed consultation response has been received from Northumbrian Water Limited (LPR 133). No objection is raised at this stage and NWL will continue to be consultees on major applications.	No	
LPR085d	Transport and Infrastructure	Matthew Hewitt	Hamilton Willis		Section			10. Transport and Infrastructure	Neutral	DBC Local Plan Review: New 30-Month Local Plan In the event that following the outcome of this consultation DBC seek to pursue the preparation of a new style 30-month Local Plan then we would seek clarity on the following points: •Is the published Darlington Northern Link Road options sufficient to warrant consideration of a new style 30-month Local Plan which holistically reviews the future Spatial Strategy rather than pursue a DBC Local Plan Review under the transitional arrangements? •How would a new Local Plan reflect the implications of the published Darlington Northern Link Road options? Would this have any implications on existing development allocations? •What documents will be produced to form the supporting evidence base?	A new style plan should be pursued due to the ongiong consultation on Northern Link Road Options.	This is a separate ongoing process lead by the Combined Authority. The plan review is not dependent on a conclusion to this work nor is there sufficient certainty at this stage to justify any sort of safeguarded route. It is unlikely that even were a new style plan purused there would be much more certainty as this would need to start this year. Progress on the Northern Link Road will be closely monitored and reflected in future plan updates.	No	
LPR086	Transport and Infrastructure	Roger Fitzpatrick-O	Resident		Section			10. Transport and Infrastructure	Object	As per the Planning Inspector's comments regarding the 2016-2036 Local Plan, it should be made clear that the Local Plan is not reliant on the Darlington Northern Link Road (DNLR) Para 10.5.9 – I strongly object to the removal of the wording that the local Plan is not reliant on the DNLR. Removing it suggests that the revised Plan is reliant on this road. The DNLR will have a major impact on Policy H10 Skerningham Site Allocation. The route for the DNLR must therefore be decided prior to any planning applications for the Skerningham Garden Village being approved. It is unsuitable to put a bypass through a new housing estate for resident health, safety and wellbeing, and incompatible with requirements for the local distributor road in the Skerningham Garden Village Design Code. A bypass and a local distributor road are very different and perform very different functions and mashing them together would result in the worst of both worlds.	Objection to the removal of the wording in para 10.5.9.	The removal of this wording ws more to do with the fact the options for the road has been revisited. Therefore the route may not connect directly to the A66 for example.	No	

LPR123f		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		Access and Accessibility - costs per dwelling- Policy - IN2			HLL/HE note requirements within criterion f) for extended bus services and other sustainable travel measures. This also includes a new cost per dwelling for the walking and cycling network. Whilst draft policy IN2 states that contributions will be "sought from all developments, where considered appropriate", in its current format HLL/HE object to the current wording to ensure that the plan is clear on where such developer contributions would or would not be appropriate. It is also unclear what the impact of such costs would be upon local plan viability. In this instance the cost per dwelling in the "remaining urban area" for the remaining 1,250 homes at Burtree Garden Village could range from £937,500 to £1,875,000 as a simple estimate. A cost which is not factored into development viability and would not be reasonably related in scale or kind as per the requirements of the CIL regulations. As a plan wide matter, criterion e) of this policy should state at the outset that "requirements for contributions will be assessed on a site by site basis taking into account the accessibility connections demonstrated within the proposals. Contributions will be sought, where appropriate for the following sustainable travel measures on a proportionate basis" Using Burtree Garden Village as a site specific example, the provision of a subsidised bus service (to be extended), active travel routes and connection to existing routes on site boundaries has already been captured within the phase 1 planning consent. Future planning applications would also provide further contributions toward active travel on site. In this instance it would be clear that further costs per dwelling would not be appropriate for a larger, multi-phase strategic site that may be more applicable to other developments. For clarity, the supporting text (10.6.2) to policy IN2 could include the following: "For larger strategic sites delivered across plan periods, including masterplanned mixed-use Garden Village allocations; the considered need for planning obligations relating to sustainable travel will account the work to date on infrastructure delivery and previously agreed planning obligations. It will also account of the delivery of active travel measures within allocations which create a new	Objection to lack of clarity as to when developer contributions towards sustainable transport would be sought. This additional contribution will impact viability. Suggested wording provided for resoned justification relating to larger masterplanned sites.	The representation highlights the need on larger allocations to consider the provision as a whole and not necesserily at each application. Such large allocations may even provide their own facilities that need suitable access. The suggested wording has been adapted but is considered beneficial.	Yes	In paragraph 10.6.2 add: "For larger strategic sites delivered across extended periods of the plan, the considered need for planning obligations relating to sustainable travel will take account of the work delivered to date on infrastructure delivery and previously agreed planning obligations. It will also account of the delivery of active travel measures within allocations which create a new community with access to new schools, retail and other services".	
LPR123g		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		The Strategic Road Network – Policy IN1	Policy IN1 and supporting text 10.5		HLL/HE comments in relation to Policy IN1 reflect those made on Policy H11. In particular the comments relate to the anticipated amount of housing and employment which could be delivered within the plan period to 2042 based on known mitigation requirements. As stated in paragraph 115 of the NPPF, in allocating sites it should be considered whether any "significant" impacts upon the highway network can be cost-effectively mitigated to an acceptable degree through a vision-led approach. The test for an un-acceptable highways impact is one that is "severe" post implementation of mitigation, taking into account all reasonable future scenarios. HLL/HE do not have specific comments on Policy IN1 as drafted, noting the requirement for Darlington Borough Council and applicants to work with National Highways "to ensure the existing route of the A1 and A66 is maintained and improved in order to maintain it's in line with its strategic function and enables residents and businesses to continue to benefit from good links to the strategic road network, with contributions sought from developers to a programme of highway improvements where applicable". The list of strategic mitigation schemes in draft policy IN1 remains largely unchanged from the adopted plan to 2036, suggesting that mitigation requirements for committed and allocated development to 2042 also remains as previously identified. This is re-iterated further in paragraph 10.5.18 (un-tracked version) noting that highways modelling was undertaken for allocations to 2036 which largely remain unaltered. It is noted also that this part of the consultation document states that further work will be undertaken to understand the impact of the proposals in this plan review prior to submission. HLL/HE would welcome further discussions with officers on the nature of this work and its envisaged conclusions. Nonetheless, in the absence of further information, it is vital, for the drafting of a justified and effective plan, that this work and the next iteration of the plan accounts for the following: That some allocations in the adopted plan to 2036 are now commitments via implemented planning consents and form part of highways and traffic baseline moving forward. This is an alteration from the previously presented highways evidence. The prior examination of the now adopted Local Plan included a detailed understanding of highways impact and mitigation required for any development allocated to 2036. However, a range of allocated	Noteing that further modelling work is to be produced and encouraging further dialogue with National Highways. Noteing that there are no significant changes to the proposed highway mitigations at this time.	Updated highway moddeling work is being produced to verify proposed mitigations remain sufficient. Once this work is concluded we will look to develop a statement of common ground with National Highways on ant strategic highway issues.	No		
LRP123o		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		Burtree Employment Park (Policy E2)	IN8- Broadband	Neutral	The reference to gigabit capable broadband is noted, however, "gigabit capable broadband or suitable alternative" will enable greater flexibility across a plan period where technology advances and requirements change.	Suggested alternative wording.	No objection to incorporating this suggested wording. It would allow an element of future proofing.	Yes	Insert gigabit capable broadband or suitable alternative'	
LRP123p		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0191 3233146	Policy		Burtree Employment Park (Policy E2)	IN10 – Community and Social Infrastructure	Object	HLL/HE note the inclusion of criterion "B) Health Contributions for GP provision" which seeks to address impacts on upon GP services where existing capacity is not present. This is supplemented by a formula in supporting text 10.11.18 to establish the level of contribution for developments of 20 dwellings or more. With regard to Burtree Garden Village, healthcare provision is part of the H11 requirement and is part of the local centre as approved. As such, additional financial contributions for larger strategic sites with their own provision are not applicable. This is clarified in relation to school provision at both Burtree Garden Village and Skerningham at 10.11.6 and as such HLL/HE would request that a similar clarification is added to paragraph 10.11.13 on GP Provision. Which states: "To ensure health and GP provision is provided close to the strategic housing growth, where Skerningham and Burtree Garden Village Strategic Allocations (Policy H 10 and H 11) include provision of alternative facilities within the allocations , this will be in lieu of developer contributions."	On sites where land is secured the provision of alternative facilities should be in lieu of developer contributions.	At present we are no looking to change this. Whilst we acknowlege that land reservations should help to deliver new facilities it does not guarentee it . This will need to be considered on a case by case basis. It may be that a land reservation is not taken up or needed anymore in which case a contribution may be sought.	No		
LPR120e		Green Party Councillor Bryony Holroyd			Section				Object	Delivery of services on sites:a.Land is often set aside for facilities, but there is no method to enforce provision of such facilities. DBC must build in such mechanisms throughout the planning process, including back-up options, such as Section 106 payments towards service provision, if the developer does not provide them. b.Mention of Neighbourhood Forums to manage community / green spaces and other services on a site - whether these (and Neighbourhood Plans) can be used as a mechanism to ensure essential local services get built. c.Where development sites are adjacent to sites which attract high traffic movements and parking pressure, it should be a requirement to build in parking restrictions, and resident parking zones, as part of the development. This includes developments in close proximity to the town centre, large employment sites, education sites, railway stations, the airport, sports venues such as rugby / football grounds and golf courses, parks and even large popular allotment sites, to prevent negative impacts on amenity/access to residents. Also, in travel planning and traffic modelling for these sites, the additional impact of the existing vehicles and parking must also be built into the modelling & design, to ensure it can cope. d.For all new sites of more than 10 homes, and employment sites, travel plans must be generated, and escrow payment to Modeshift (or equivalent organisation) to ensure that the travel plan mode shift requirements are actually delivered. For too many sites, travel plans are written then never implemented.	Concern over non-delivery of infrastructure.	The local plan does contain mechanisms to secure contributions for infrastructure. These are considered on an application by application basis and typically stipulated in legal agreement should permission be granted.	No		

LPR120f		Green Party Councillor Bryony Holroyd			Section					Wording on Sustainable Transport Networks is moved from policy IN1, paragraph a) iii), into Policy IN2, but there it has been watered down and needs improving. Policy IN2 should be strengthened: i. Point c) should be reworded to emphasise the five core principles of good active travel design: Coherent, Direct, Safe, Comfortable and Attractive. ii. Similarly, the inclusivity of design accessibility should be included to ensure that infrastructure meets all needs. iii. Developers should be expected to consider connections outside the red line boundary when designing active travel infrastructure. iv. New development must be permeable for walking and cycling, and we must ensure sustainable transport is prioritised - so it's the most direct, convenient and default method of getting around within and from new developments - if not, this would contradict national policy to improve active travel permeability (which hasn't changed), and our local climate change and transport policies. h. It must become routine to require developers to provide - or contribute towards - the connection of new sites by safe segregated LTN 1/20 standard active travel routes to local services, jobs, and the town centre, via Section 106 contributions - these should not just be for public transport, road connections, education and health. Additional comments can be seen in the submitted attachment.	It is considered the wording that has been moved from IN 1 to IN 2 has been weakened. Developer contributions should be sought for more than just public transport, road connections and links to education and health.	We consider this wording has been strengthended. Policy IN 2 sets out that contributions will be sought for a range of mitigation measeures certainly not limited to those listed in the representation. Please see those mentioned in piont e.	No					
LPR133c		Katherine Dobson	NWL		Section			10. Transport and infrastructure	Object	We strongly encourage Darlington Council to consider the inclusion of a policy on the topic of Asset Protection and Encroachment in relation to the effective and safe operation of our wastewater and water infrastructure seeking to minimise impact on sensitive receptors. Such a policy would be appropriate either in this section or in the Sustainable Design section of the Local Plan. We request that the Council considers policy and supporting paragraph wording similar to this: "Development will only be permitted where it can de demonstrated that there will be no unacceptable impact. Sensitive development (such as housing, schools and hospitals) will not be permitted near to an existing polluting or hazardous operation including wastewater and water operational facilities. Regard should be had for the outputs from such existing operations including air quality, noise, odour, traffic generation and general amenity loss." Development of sensitive uses within close vicinity of such existing potentially polluting or hazardous land use operations should be considered inappropriate development with long term amenity issues likely to be of concern to those future sensitive receptors. Appropriate technical bodies should be fully consulted, and appropriate buffer zones should be integrated into any development design.	A policy should be included in the plan for 'Asett Protection' for NWL facilities.	We do not consider such a policy necessary at this stage. Also, if one is included for one utility other utilities would need to be afforded similar protection. NWL continue to be a statutory consultee on applications and there are considered to be sufficient other protections in place to ensure new development in unsuitable locations is resisted.	No					
LPR134	Transport and Infrastructure	Peter Thomson	Northern Gas Networks		Section			10. Transport and Infrastructure		Northern Gas Networks (NGN) can confirm that, at a strategic level, there are currently no known gas network capacity constraints affecting the Darlington area. While network conditions are dynamic and subject to change over time, our assessment indicates that currently the wider network has sufficient capacity to support forecast demand. At a more local level, our network generally has the capability to accommodate new developments and connections. However, detailed capacity assessments are undertaken on a site-specific basis in response to individual connection applications to ensure that local network requirements can be appropriately considered. We also discussed future energy infrastructure and the role of hydrogen within the region. In particular, the East Coast Hydrogen project is now focused on supporting industrial cluster decarbonisation. Following the Government's decision not to progress hydrogen for domestic heating at this stage, the project is not anticipated to extend to the Darlington area. Based on current investment plans, NGN is not aware of any major strategic gas infrastructure projects proposed within or directly affecting Darlington. However, NGN will continue to undertake ongoing investment in the network through the replacement of metallic lower-pressure mains as part of our asset management and safety programmes.	No currently known gas network capacity issues. This may be subject to change. Detailed capacity asessments will be undertaken in due course.	Detials on capacity and future consultation are noted.	No					
LPR062a	Sustainable Design and Climate Change	David Clark	Resident		Policy	3	IN6 - Utilities Infrastructure		Object	Northumbrian Water Limited current sewage capacity at Darlington's only waste water treatment plant at Stressholme Revised Local Plan 10.10.4 and 5 does not mention the current limits on water treatment or sewer capacity and works (and timescales for major capacity upgrades) required for these to be met. Evidence must be provided in the revised Local Plan of how DBC plans to work with NWL to help reduce overflows as in an Environment Information Request dated February 2026 which is now showing their publicly accessible register NWL stated the following: 'Based on the updated dataset, the most recent assessment now shows that Stressholme is operating at 91.6% of its capacity this gives a headroom of 2,414 cubic metres pd, being the equivalent of 12,573 people and 5,239 houses. The additional capacity at Stressholme WwTW is therefore 8.4% of the DWF Northumbrian Water will continue to work with Darlington BC Planning Authority to provide responses when invited to comment on any proposals for the Skerningham development Stressholme WwTW has been identified as requiring a DWF compliance upgrade at some point between 2030 and 2040.' DBC as a competent Local Planning Authority must really demonstrate in the proposed revised Local Plan how for the members of public it can help meet NWL's Water Framework Directive requirement, to ensure water quality improves for the health and wellbeing of the public and our local environments including the Rivers Skerne and Tees water quality and do everything in their power to help reduce raw sewage spills. The recent Channel 4 'Dirty Business) series highlights what happens when local authorities do not take raw sewage spills seriously and help prevent them from occurring by working closely with the likes of NWL. Should works be required by the council, to separate car park & road drainage from combined sewers to reduce overflows to help Stessholme Water Treatment plan lack of capacity improve? NPPF & National Policy Requirements •Infrastructure Coordination: The NPPF requires local planning authorities to collaborate with public bodies and water companies to ensure development is accompanied by sustainable water supplies	Objection raised to the percieved lack of sewage capacity within the borough.	A detailed consultation response has been received from Northumbrian Water Limited (LPR 133). No objection is raised at this stage and NWL will continue to be consultees on major applications.	No					
LPR120i	Sustainable Design and Climate Change	Councillor Bryony Holroyd			Policy	3	IN6 - Utilities Infrastructure		Neutral	10.Sewage / wastewater treatment capacity issues a.In 10.10.4 and 5, no limits are mentioned of our infrastructure for wastewater treatment (Stressholme currently running at 91.6% of its dry weather flow (DWF) capacity), and sewer capacity to get wastewater to the treatment works without overflowing via combined sewer overflows (CSOs) in periods of high rainfall. Given recent publicity, this is not believable by the public. b.Nor is it covered how DBC will meet its Water Framework Directive requirements, that the council ensure water quality in our waterways improves. Are works required by the council, e.g. separating car park / road drainage from combined sewers to reduce chance of CSO overflows? c.Northumbrian Water Ltd (NWL) must carry out works on South Park CSO to significantly cut its spill frequency. Have NWL been consulted? Their delivery plans, timescales and requirements should be presented as evidence that they can meet extra needs (e.g. Stressholme DWF upgrade in 2030-40, sewer capacity upgrades). d.The Environment Agency only comments on developments of 100+ homes (a small proportion of our planning applications), requesting Grampian conditions if needed. The remainder pass under the radar with no conditions required - unless we set policies in the Local Plan for water & sewerage - these should be added now.	Objection raised to the percieved lack of sewage capacity within the borough.	A detailed consultation response has been received from Northumbrian Water Limited (LPR 133). No objection is raised at this stage and NWL will continue to be consultees on major applications.	No					

LPR053e	Sustainable Design and Climate Change	Patricia Meredith	Resident		Section		IN6 - Utilities Infrastructure			The Plan does not adequately address sewer and treatment capacity constraints. This omission is not credible given national scrutiny. The council must demonstrate how Water Framework Directive obligations will be met. Evidence is required of Northumbrian Water's upgrade plans, including South Park CSO and Stressholme (2030–40). Baseline water and sewerage policies must apply to all developments, not only those over 100 homes.	Objection raised to the percieved lack of sewage capacity within the borough.	A detailed consultation response has been received from Northumbrian Water Limited (LPR 133). No objection is raised at this stage and NWL will continue to be consultees on major applications.	No	

LPR reference (starting at LPR021)	Topic	Name	Organisation	Agent name and address	Site / Policy / Sec	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR041f	Glossary	Mr J N & Mrs N J Swinbank		Andrew Moss, Ward Hadaway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DX Tel: 07899878420 andrew.moss@wardadaway.com	Section			11. Glossary	Object	The definition of 'infill development' should include the filling of gaps and rounding off.	The definition of 'infill development' should include the filling of gaps and rounding off.	The defintition includes 'the filling of gaps' between buldings. Other gaps and 'rounding off' is considered to introduce too much uncertainty.	No	None

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LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Se	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR059 & 60k	Appendix	Dominic Crowley	Lichfields		Section			Appendix A	Object	The housing trajectory included within the Local Plan review highlights that the Council will fail to meet its minimum annual housing requirement from 2037 onwards. Whilst Hallam Land acknowledge that a further Local Plan review will be required prior to 2037, the Council should be planning to meet their annual requirements across the full Plan period. Provision of additional allocations with clear evidence of deliverability, such as Hallam Land's site west of Roundhill Road would help to achieve this. In addition, it is essential that sufficient flexibility is built into planning policy to allow sustainable windfall sites to be delivered should they be required.	The housing trajectory highlights that the Council will fail to meet its minimum annual housing requirement from 2037 onwards. Acknowledged that a further Local Plan review will be required prior to 2037. However, the Council should be planning to meet their annual requirements across the full Plan period. Provision of additional allocations with clear evidence of deliverability, such as Hallam Land's site west of Roundhill Road would help to achieve this. it is essential that sufficient flexibility is built into planning policy to allow sustainable windfall sites to be delivered should they be required. It is essential that sufficient flexibility is built into planning policy to allow sustainable windfall sites to be delivered should they be required.	As stated a review of the Local Plan will take place prior to 2037. There is also overall a sufficient land supply buffer within the draft plan. Flexibility is included via the windfall mechanism in policy H1.	No	
LPR064 & 065g	Appendix	Nick Pleasant	Stantec on behalf of Vistry		Section			Appendix A	Object	Upon review of the draft plan housing trajectory against the adopted plan housing trajectory and historic delivery rates across the Borough, it is clear the majority of site-specific delivery rates within the Draft Plan trajectory remain materially unchanged from those previously published by DBC in December 2025. 3.12.2 No clear evidence has been provided to explain why delivery rates that have not been achieved previously are now considered realistic or achievable within the Draft Plan period. Vistry acknowledges three additional sites have been included in the trajectory, however none of these sites are committed developments and are proposed as new allocations. As proposed allocations, they remain subject to further planning consent and infrastructure being delivered, as well as being vulnerable to market risks. Fundamentally they will deliver at a slower rate in the early years of those sites and will not deliver until much later in the plan period. See submitted attachment.	Delivery rates in comparison to the adopted plan remain unchanged. No evidence provided to explain why delivery rates that have not been achieved previously are now considered achievable. The three new allocations require planning consent and infrastructure being delivered, as well as being vulnerable to market risks. They will deliver later in the plan period. The draft plan relies on a number of large strategic sites which have no record of housing completions to date (Skerningham, Burtree GV, Land south of the railway and Burtree Lane). Despite this the trajectory forecasts that these site will begin delivering immediately (2026/27).The trajectory is backloaded and has substantial delivery risk. Little continengency should anticipated delivery not occur as they previously have.	Further evidence on the delivery of housing allocations is to be provided at the next stage of plan preparation (reg 19). The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking.	No	
LPR113 & 114h	Appendix	Rachel Coates	Bellway Homes	Rachel Coates, Stantec.	Section			Appendix A	Object	Upon review of the draft housing trajectory contained within the Draft Plan against the adopted housing trajectory and historic delivery rates across the Borough, it is clear the majority of site-specific delivery rates within the Draft Plan trajectory remain materially unchanged from those previously published by DBC in December 2025. No clear evidence has been provided to explain why delivery rates that have not been achieved previously are now considered realistic or achievable within the Draft Plan period. Bellway do acknowledge that three additional sites have been included, however none of these sites are currently committed developments and are proposed as new allocations. As proposed allocations, they remain subject to further planning consent and infrastructure being delivered, as well as being vulnerable to market risks. Appendix 2 of the Draft Plan outlines a housing trajectory which is heavily reliant on the delivery of a small number of large strategic sites, including Burtree Garden Village (formerly Greater Faverdale),Skerningham, Land South of the Railway and Land South of Burtree Lane. Many of these sites have no meaningful record of housing completions to date, having remained undelivered since their allocation within the adopted plan. Despite this, the housing trajectory forecasts that these sites will begin delivering immediately (2026/27) following adoption of the Draft Plan (see submission) The Draft Plan trajectory is significantly back loaded, especially considering this strategy is supposed to be the continuation of an overarching housing strategy coming into its 9th year of operation assuming a rapid acceleration in delivery from sites which historically have shown a limited or non-existent delivery track record. This approach introduces substantial delivery risk and provides little contingency should the anticipated delivery rates fail to materialise as they previously have.	Concerns raised that delivery rates in the draft plan trajectory remain unchanged from the adopted Local Plan. No evidence provided to explain why delivery rates that have not been achieved previously are now considered realistic or achievable. The three new allocations still require planning consent and infrastructure being delivered, as well as being vulnerable to market risks. The trajectory is reliant on large strategic sites which have no meaningful record of housing completions to date and estimates show delivery occuring immediately within 2026/27. The approach has substantial delivery risk with little contingency.	Further evidence on the delivery of housing sites will be produced at the Reg 19 stage. The Council is confident that a number of allocations will begin on site within five years and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. The Council considers that an appropriate range of sites have been proposed for allocation in the draft Local Plan. This has been informed by the draft HELAA and SA process. A housing land supply buffer has also been incorporated. The NPPF is clear in that the supply of a large numbers of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking.	No	
LPR087	Appendix	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Section		20 Great Burdon	Appendix B	Object	Client fully supports the retained allocated at Great Burdon (Site ref 20). Long submission. Please refer to document.	Broadly supportive of much of the criteria within draft Appendix B however there are a number of comments which will ensure the criteria is sound. Criteria (a) - there is no clarity provided on the expectations of this infrastructure to be delivered in terms of responsibility, contributions and timescales of delivery. This is likely to be discussed through the planning application. Criteria (b) - no specific comments. Criteria (c) - overly prescriptive by limiting development in certain locations. Consideration should be given to altering the wording to align more closely with the NPPF. Criteria (d) - lacks flexibility and is not consistent with national policy. Conider rewording. Criteria (e) - is unjustified and inconsistent with the NPPF and PPG in relation to surface water floodrisk. The criteria could preclude development in areas that could be acceptable by undertaking a site-sepcific flood risk assessment. Criteria (f) - includes an amendment which references the Skerne as an existing green corridor. This simply duplicates policy requirements of ENV3, ENV4 and ENV5. The criteria should be returned to its former wording or removed from appendix B. Criteria (g) - concern that no evidence has been provided to support the designation of green corridors. Also potential duplication with ENV7. Request that criteria g is removed. Criteria (h) - requests that flexibility is added. "Local recreation and green infrastructure links surrounding Red Hall Local Wildlife Site could be strengthened, where site-specific constraints and opportunities allow". Criteria (i) - concern that it doesn't take into account broad site opportunities and constraints. Suggests additional text. "These opportunities should be sought where appropriate, taking into account any other relevant site-specific opportunities and constraints". Duplication with policies ENV4 and ENV5, therefore questioned whether necessary. Criteria (j) - no specific comment. Criteria (k) - no specific comment. Criteria (l) - duplicates requirements set out under criteria (n) and is over prescriptive and duplicates national policy. Concern with definition of significant buffer. Rewording /	There are no changes proposed to criteria (a) and it remains as adopted. As mentioned details of site access will be undertaken at the planning application stage. No changes are proposed to criteria (c) and it remains as adopted. Evidence for the specifications on layout come from the sites associated heritage impact assessment. No changes are proposed to criteria (d) and remains as adopted. This was drafted with input from the Environment Agency. Comments noted with regards to criteria (e) and wording change is proposed. Criteria (f) does include a new reference to an existing green corridor which is illustrated on the adopted policies map. It could be argued that it duplicates existing requirements however it highlights to developers and stakeholders the environmental characteristics of the site. Criteria (g) again highlights to developers and stakeholders the environmental characteristics of the site. The Darlington Green Infrastructure Strategy provided evidence on the green corridors identified. Criteria (h) remains unchanged. Increased flexibility is not considered necessary. Criteria (i) remains unchanged from the adopted plan. No changes required. No changes are proposed to criteria (l) and (n) and therefore are still considered appropriate. A significant buffer	Yes	Amend allocation statement for site 20 Great Burdon criteria e to read - Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.
LPR127, 128 & 129v	Housing	Ros Kain	Historic England		Site		11 Cattle Mart	Appendix B	Support	See Appendix B of submission. Existing allocation. Same total yield over Plan period. Appendix B – Site 11 – Issues & Requirements. Suggested change- Existing allocation. Same total yield over Plan period. Appendix B – Site 11 – Issues & Requirements	Site ref 11, Cattle Mart - We support the retention of the site-specific requirements as set out in the allocation statement for Site 11 - d), e), f) and g (appendix B).	Support noted.	No	
LPR052e	Housing	Louise Tait	Environment Agency		Site		20 Great Burdon	Appendix B	Neutral	Site ref: 20, Great Burdon The River Skerne is a main river and major source of fluvial flood risk along the western boundary of this plot. A large swath of this floodplain is in the 1 in 30yr return period risk of flooding which is classified as functional floodplain (Flood Zone 3b). The Environment Agency would not support development in any area of site that is within Flood Zone 3b except for essential infrastructure (subject to passing the exception test) and water compatible development. Climate change will significantly expand the Skerne floodplain in this area by up to 50m in places. There are also two unnamed ordinary watercourses, one runs along the southern boundary. Development should avoid Flood Zone 3 along this watercourse as flooding has potential to impact the Red Hall housing estate along Coombe Drive. The other, shorter, ordinary watercourse is entirely within flood zone 3 of the River Skerne. We would strongly recommend development is avoided west of the Great Burdon Farm access track.	Site ref 20, Great Burdon - The River Skerne is a main river and major source of fluvial flood risk along the western boundary of this site. A large swath of this floodplain is classified as functional floodplain (Flood Zone 3b). The Environment Agency would not support development in any area of site that is within Flood Zone 3b except for essential infrastructure (subject to passing the exception test) and water compatible development. Climate change will significantly expand the Skerne floodplain in this area by up to 50m in places. There are also two unnamed ordinary watercourses, one runs along the southern boundary. Development should avoid Flood Zone 3 along this watercourse as flooding has potential to impact the Red Hall housing estate along Coombe Drive. The other, shorter, ordinary watercourse is entirely within flood zone 3 of the River Skerne. We would strongly recommend development is avoided west of the Great Burdon Farm access track.	Criteria d within the allocation statement directs development away from flood zones 2 and 3. It also states that there should be no development with FZ3b with exception to essential infrastructure or water compatible development. It is considered that the criteria covers the comments raised.	No	

LPR127, 128 & 129s	Housing	Ros Kain	Historic England		Site		20 Great Burdon	Appendix B	Neutral	See Appendix B of submission. Existing allocation. Same total yield over Plan period. Appendix B – 20 – Issues & Requirements. Suggested change - We support the retention of the site-specific requirements as set out in Appendix B - Site 20 - c), j), l), m) and n). We suggest the following amendment to the text to ensure delivery of the S&DR walking and cycling route.(m). The historic route of the Stockton & Darlington Railway falls within the site. The route of the historic track bed, or an alternative adjacent to it where it is live railway line, must be retained and incorporated into the development layout. It must be legible. publicly accessible and subject to appropriate hard and soft landscaping and interpretation. This is to ensure the significance of the heritage asset is conserved, enhanced and can be celebrated by future generations.	Site ref 20, Great Burdon - Support the retention of the site-specific requirements as set out in Appendix B - c), j), l), m) and n). We suggest the following amendment to the text to ensure delivery of the S&DR walking and cycling route.(m). The historic route of the Stockton & Darlington Railway falls within the site. The route of the historic track bed, or an alternative adjacent to it where it is live railway line, must be retained and incorporated into the development layout. It must be legible. publicly accessible and subject to appropriate hard and soft landscaping and interpretation. This is to ensure the significance of the heritage asset is conserved, enhanced and can be celebrated by future generations.	Comments noted. The Stockton & Darlington railway falls outside of the site along the southern boundary. It is considered that the existing criteria covers the points raised.	No	
LPR127, 128 & 129z	Housing	Ros Kain	Historic England		Site		95 Beech Crescent East, Heighington	Appendix B	Neutral	See appendix B of submission. Existing allocation. We support the retention of Site 95 – b & c.	Site ref 95, Beech Crescent East, Heighington - We support the retention of site 95 and criteria b and c within the allocation statement.	Comments noted.	No	
LPR052f	Housing	Louise Tait	Environment Agency		Site		100 Hall Farm Branksome	Appendix B	Neutral	Site ref:100, Hall Farm, Branksome The Baydale Beck is a main river and major source of fluvial flood risk along the southern boundary of this plot. The majority of this floodplain is in the 1 in 30 return period risk of flooding which is classified as functional floodplain (Flood Zone 3b). The Environment Agency (EA) would not support development in any area of site that is within Flood Zone 3b except for essential infrastructure (subject to passing the exception test) and water compatible development. There is an ordinary watercourse along the eastern boundary of this plot. We do not have any modelling data for the majority of its course. As a result, there are no flood zones but this does not mean there is no flood risk near this river. Additionally, the houses immediately opposite this river bank could be at risk of flooding from any development along this section of land. At a minimum, there should be ground level surveys undertaken for any future development of the site to determine risk from the river. Hydraulic modelling may be required. This allocation is located within 250 metres of a known closed landfill site that is potentially producing landfill gas. The former landfill site is called Hall Farm Landfill and is located off Newton Lane, Darlington and adjacent to the A1 road. The licence (Licence reference number: EAWML 67088) was issued on 15 April 1980 and surrendered on 4 October 1988. Our records indicate that the site accepted household, industrial, commercial, non-hazardous industrial (potentially flammable) and construction wastes.	Site ref 100, Hall Farm - Baydale Beck is situated along the southern boundary of the site and within functional floodplain (Flood Zone 3b). The EA would not support development in any area of site that is within Flood Zone 3b except for essential infrastructure (subject to passing the exception test) and water compatible development.There is a watercourse along the eastern boundary of the site. We do not have any modelling data for the majority of its course. As a result, there are no flood zones but this does not mean there is no flood risk near this river. Additionally, the houses immediately opposite this river bank could be at risk of flooding. At a minimum, there should be ground level surveys undertaken to determine risk from the river. Hydraulic modelling may be required. This allocation is located within 250 metres of a known closed landfill site that is potentially producing landfill gas. Our records indicate that the site accepted household, industrial, commercial, non-hazardous industrial (potentially flammable) and construction wastes.	Criteria b of the allocation statement outlines that no development should take place within FZ3b with the exception of essential infrastructure and water compatible development. It can be added into the allocation statement that there is also a watercourse along the eastern boundary of the site and that no floodrisk data is available for this area. It can be stated that, as a minimum there should be ground level surveys undertaken to determine risk from the river and hydraulic modelling may be required.	Yes	Add in to allocation statement for site 100 Hall Fram, Branksome - There is also a watercourse along the eastern boundary of the site and no floodrisk data is available for this area. As a minimum there should be ground level surveys undertaken to determine risk from the river and hydraulic modelling may be required.
LPR127, 128 & 129t	Housing	Ros Kain	Historic England		Site		100 Hall Farm Branksome	Appendix B	Neutral	Existing allocation. Same total yield over Plan period.	Site ref 100, Hall Farm - Existing allocation. Same total yield over Plan period. No changes proposed.	Comments noted.	No.		
LPR115	Housing	Emma Williams	Church Commisioners for England - Deloitte	Emma Williams, Deloitte,	Site		100 Hall Farm, Branksome	Appendix B	Object	The Commissioners support the continued allocation of the Hall Farm site for residential development. They consider the proposed allocation policy set out in Appendix B of the draft Local Plan should be amended in line with the following: Criterion (c) – Surface Water Flooding The Commissioners consider the proposed wording for Criterion (c), which directs development away from areas of surface water flooding, to be overly prescriptive. While supporting efforts to mitigate flood risk, this criterion does not fully align with national planning policy. The Planning Practice Guidance (PPG) (September 2025, Paragraph: 027 Reference ID: 7-027-20220825) advises that site layouts can be designed to ensure safety from surface water flood risk, negating the need for a sequential test if demonstrated within a site-specific flood risk assessment. The current wording is also contrary to NPPF Paragraph 16(f), which states that plans should serve a clear purpose and avoid unnecessary duplication. The Commissioners request that Criterion (c) be either removed or amended to explicitly reference the ability to justify site-specific layout mitigation, thereby ensuring flexibility for development proposals in line with national guidance. Criterion (d) – Green Corridors The Commissioners note the proposed additional text inserted into Criterion (d) regarding Cocker and Baydale Becks being "identified as existing and proposed green corridors". It is unclear why this additional text is necessary. It appears to serve no purpose as the point is already addressed in adopted policy wording that is proposed to be retained as part of the review (in Policy ENV 4(a) and (b)). The Commissioners therefore request that this additional proposed text is removed from the draft	Site ref 100, Hall Farm - Criteria (c) - on surface water is overly prescriptive and does not allow for full consideration of the NPPF and PPG. It should be removed or amended to reference the ability to justify site-specific layout mitigation, supported by a site-specific flood risk assessment. Criteria (d) - insertion of reference to existing and proposed green corridors is not necessary and duplicates policy within ENV4. The inserted wording should be deleted. Criteria (e) - concern with the wording 'significant' landscape buffer should be provided along the A1(M). This is overly prescriptive and lacks justification. Suggested wording "A landscape buffer should be provided along the A1(M), the details of which are to be informed by technical assessments and detailed design". Critreia (f) - suggests adding text at the end to make reference to the need to balance considerations for the potential enhancement of the public right of way as part of the site layout as part of a wider consideration and balancing exercise with other constraints that may impact on net developable area.	Comments noted on surface water flood risk. Amendments are proposed to the criteria to be less prescriptive on layout and so these areas can be mitigated via an appropriate drainage strategy. Although there may be the view that inserting references to green corridors is duplication, it highlights to developers and stakeholders the green infrastructure designations that are within the site which can be useful. Criteria e regarding the landscape buffering to the A1(M) was considered appropriate and sound via the previous Local Plan examination. This wording has not been altered for the review draft and landscape buffering will provide noise mtigation to the A1(M) and reduce landscape impacts. Again critreia f was found to be appropriate and sound via the previous exmaination. No alterations are proposed to this.	Yes	Allocation statement site 100, alter criteria c to read -Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.
LPR111 & 112a	Appendix	Ben Westwood / Ja	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BZ	Section		100 Hall Farm	Appendix B	Object	As noted in the submitted text at supporting paragraph 6.2.16, Appendix B of the Plan review provides guidance for each housing allocation, outlining site-specific requirements, constraints and relevant contextual information. Comments on behalf of our Client on respective elements of the Site Allocation Statement, with proposed amendments under the Regulation 18 consultation, will be provided in turn below. Criterion (c) Criterion (c) is a new site-specific requirement proposed as part of the Regulation 18 document. The new criterion states that development should be directed away from areas of surface water flooding across the Site. While our Client supports efforts to ensure that development does not increase the risk of flooding elsewhere, and that homes are designed in a way that is sensitive to both fluvial and surface water flooding, the insertion of Criterion (c) is considered to be overly prescriptive, and does not allow for full consideration of the NPPF and PPG. Updates to the PPG in September 2025 (Paragraph: 027 Reference ID: 7-027-20220825) advise that where a site layout can be designed to ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), and where this can be demonstrated within a site-specific flood risk assessment, the sequential test need not be applied owing to the fact that surface water flood risk has been mitigated. In this regard, Criterion (c) is not consistent with PPG in respect of mitigating surface water flooding. We would request that Criterion (c) is either removed in full, or where retained, be amended to reference the ability to justify site-specific layout mitigation, supported by a site-specific flood risk assessment, to overcome any identified surface water flooding risks.	Site ref 100, Hall Farm - Criteria (c) - on surface water is overly prescriptive and does not allow for full consideration of the NPPF and PPG. It should be removed or amended to reference the ability to justify site-specific layout mitigation, supported by a site-specific flood risk assessment. Criteria (d) - insertion of reference to existing and proposed green corridors is not necessary and duplicates policy within ENV4. The inserted wording should be deleted. Criteria (e) - concern with the wording 'significant' landscape buffer should be provided along the A1(M). Given the number of constraints on site and the ambition to maximise housing delivery the requirement for a 'significant' buffer is not justified. This wording should be removed. Critreia (f) - suggests adding text at the end to make reference to the need to balance considerations for the potential enhancement of the public right of way as part of the site layout as part of a wider consideration and balancing exercise with other constraints that may impact on net developable area.	Comments noted on surface water flood risk. Amendments are proposed to the criteria to be less prescriptive on layout and so these areas can be mitigated via an appropriate drainage strategy. Although there may be the view that inserting references to green corridors is duplication, it highlights to developers and stakeholders the green infrastructure designations that are within the site which can be useful. Criteria e regarding the landscape buffering to the A1(M) was considered appropriate and sound via the previous Local Plan examination. This wording has not been altered for the review draft and landscape buffering will provide noise mtigation to the A1(M) and reduce landscape impacts. Again critreia f was found to be appropriate and sound via the previous exmaination. No alterations are proposed to this.	Yes	Amend allocation statement for site 100 Hall Farm, Branksome criteria c to read - Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.

LPR094a	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Conscliffe Road, Darlington, DL3 7EH 01325 469237	Policy		392 Elm Tree Farm	Appendix B	Object	Turning to the Housing and Employment Allocation Statements set out at Appendix B of the Local Plan Review, for Elm Tree Farm some additional criteria have been added. These state that: 'e. Parts of the site are susceptible to surface water flooding. Development should be directed away from these areas in site layout.' And 'f. A public footpath crosses the southeastern part of the site and should be considered in layout.' In terms of criterion f, Mandale Homes have no concerns with the wording. In relation to criterion e, however, it is requested that this be reworded as follows: 'e. Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.' The above change is requested because it may be possible to develop in areas of current surface water flooding, subject to a robust drainage strategy which positively resolves any current or potential future issues.	Site ref 392, Elm Tree Farm (housing allocation statement). Additional criteria have been added. No concerns with criteria f relating to a public footpath being considered in site layout. In relation to criteria (e) it is requested that it is reworded as follows: 'Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.'	Comments noted on surface water flood risk. Amendments are proposed to the criteria to be less prescriptive on layout and so these areas can be mitigated via an appropriate drainage strategy.	Yes.	Amend allocation statement for site 392 Elm Tree Farm criteria e to read - Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.
LPR127, 128 & 129p	Appendix	Ros Kain	Historic England		Policy			Appendix C	Neutral	Historic England's Conservation Principles Conservation Principles, Policies and Guidance (2008) establishes heritage values as aesthetic (designed and fortuitous), historic (associative and illustrative), evidential and communal. Whilst this is still relevant the NPPF glossary uses the terminology to heritage interest under the definition of significance (for heritage policy). Heritage interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.	Amend to add reference to designed and fortuitous (aesthetic value) and associative and illustrative (historic value). Also refer to the NPPF definition of significance / heritage interest.	Comments noted and amendments proposed as suggested.	Yes	Amend significance of heritage assets in Darlington to read ' The significance of a heritage asset is the sum of its heritage values (interests). Annex 2: Glossary of the NPPF (2024) defines significance (for heritage policy) as "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural,
LPR046a	Appendix	Ben Westwood	Durham Archaeology Section		Section			Appendix C	Neutral	NDHAs – this states that once identified, these will be recorded in IDOX and added to the HER. Naturally, we do not disagree with this but the mechanisms for achieving this need to be reviewed (see attachment)	Mechanism for adding non-designated heritage assets to historic environment record needs to be reviewed.	Comments noted and contact will be made to discuss this further.	No	None
LPR046b	Appendix	Ben Westwood	Durham Archaeology Section		Section			Appendix C	Neutral	Figure C 1 – Areas of High Archaeological Potential - we just wanted to highlight that these 'Areas' are not static, and need to be updated periodically as new data is added to the HER, and/or existing information us upgraded. The version you have is due an update, and we plan to generate a new version very soon. Again, discussing a mechanism for achieving this would be great.	Areas of High Archaeological Potential are not static and need to be updated periodically as new data is added to the HER and/orexisting information is updated. New version due very soon.	Comments noted and amendment proposed to make clear this is not static and is regularly updated	Yes	Addition of - The areas of high archaeological potential are illustrated in Figure C.1 below. It should be noted that these are not static and need to be updated periodically as new or updated data is added to the Historic Environment Record. So the interactive policies map should be consulted for the latest information.
LPR125&126p	Appendix	Josh White	Natural England		Appendix			Monitoring framework and review arrangements	Neutral	Monitoring and review arrangements focus primarily on delivery outputs; these could be strengthened by including monitoring of health and wellbeing outcomes associated with nature recovery, LNRS delivery and BNG investment.	Monitoring and review arrangements focus primarily on delivery outputs; these could be strengthened by including monitoring of health and wellbeing outcomes associated with nature recovery, LNRS delivery and BNG investment.	A range of new monitoring indicators and targets are proposed which will address some of the points raised.	No	

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Sec	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR034h	Policies Map	Ross Chisholm	Friends of the Stockton& Darlington Railway		Policies Map		S&DR Croft Branch		Recommen	The policies maps show the route of the S&DR Croft Branch sited to the west of the present day East Coast Mainline between Haughton Road and Smithfield Road and to the west of Darlington station buiding. This is incorrect. Appendix A of the Historic Environment Audit of the Croft Branch, prepared by Archaeo-Environment in 2019 shows that this follows the present day through line. https://sdr1825.org.uk/wp-content/uploads/2021/03/APPENDIX-A-MAPS-OF-ROUTE-AND-ADDED-SITES.pdf The Friends recommend that the maps be amended accordingly.	Correction of the S&DR Croft Branch Line on Proposals Map	Comment noted and amendment proposed	Yes	Amendment to S&DR Croft Branch made on policies map
LPR098d	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	SUPPORT WITH A REQUEST/ CONSIDER ATION FOR EXTENSIO N OF LWS	See attached documents	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR098e	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	COMMENT	Request that consideration be given to extend the present designated Local Wildlife - See attached documents Area northwards, and to encompass the whole of the Naturalistic Parkland as designated Local Wildlife Site (Policy Map 9)	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR099d	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	SUPPORT WITH A REQUEST/ CONSIDER ATION FOR EXTENSIO N OF LWS	See attached documents	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR099e	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	COMMENT	Request that consideration be given to extend the present designated Local Wildlife - See attached documents Area northwards, and to encompass the whole of the Naturalistic Parkland as designated Local Wildlife Site (Policy Map 9)	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR100d	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	SUPPORT WITH A REQUEST/ CONSIDER ATION FOR EXTENSIO N OF LWS	See attached documents	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR100e	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	COMMENT	Request that consideration be given to extend the present designated Local Wildlife - See attached documents Area northwards, and to encompass the whole of the Naturalistic Parkland as designated Local Wildlife Site (Policy Map 9)	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR101d	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	SUPPORT WITH A REQUEST/ CONSIDER ATION FOR EXTENSIO N OF LWS	See attached documents	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.
LPR101e	Policies Map	Angela and Michael	Parkland Heritage Network (Blackwell)		Section			Policy Map	COMMENT	Request that consideration be given to extend the present designated Local Wildlife - See attached documents Area northwards, and to encompass the whole of the Naturalistic Parkland as designated Local Wildlife Site (Policy Map 9)	Proposes Blackwell Local Wildlife Site is extended to encompass the whole of the naturalistic parkland.	Comment noted and it is proposed to extend the Local Wildlife Site to include the whole of the parkland area to the north.	Yes	Extend Blackwell Local Wildlife Site on Policies Map to include whole of parkland.

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Sec	Site Details	Policy Details	Section Details	Object /Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR026/027i	General	David Barton	Community Campaigner, Civic Heritage, InYouArea Ambassador for Southport		Section			11. Glossary	Neutral	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were.	Comments noted	The Council will prepare a seperate Design Code. Non-designated heritage assets are protected in accordance with the requirements of national policy.	No	None
LPR058	General	Colin Griffiths	Satnam Planning Services for Tiviot Way							Comments made about soundness - please see submitted attachment.	Comments relating to soundness of Polices E2 and H10	Comment already addressed in response to Policies E2 and H10	No	
LPR085	General	Matthew Hewitt	Hamilton Willis		Section			General	Unknown	See attached submission. Comments made in relation to the context and purpose of representation, the Local Plan approach, the review having been prepared under the transitional arrangements. Suggests a new Policy 1 - Reviewing the Local Plan: "New Policy Policy 1 – Reviewing the Local Plan 2042 Darlington Borough Council have prepared the Local Plan 2042 under the legacy plan-making system. As such, the Council will prepare a new Local Plan under the new plan-making system introduced by the Levelling Up & Regeneration Act 2023 as required by national Government. More specifically, Darlington Borough Council will: •No later than 4 years and 8 months from adoption of this Local Plan give notice of intention to commence plan-making; and •No later than 5 years from adoption of this Local Plan publish the Gateway 1 self-assessment. •No later than 7 years and 6 months from adoption of this Local Plan adopt a new Local Plan. In the event that the timescales set out above are not adhered to, then the policies in the Local Plan 2042 which are most important for determining planning applications for new development will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework."	Suggest a new policy is introduced relating to the review of the Local Plan setting out timescales and process.	The proposed policy is not considered necessary as this would duplicate national policy and legislation so would add nothing in addition to this. There is also the risk that national policy or legislation could be amended.	No	

LPR104b	General	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621217	General				Unknown	Taylor Wimpey are concerned that the Regulation 18 consultation has not been supported by the publication of an updated evidence base to justify the conclusions reached in the Local Plan Review. If the Council is relying on the evidence base that underpins the adopted Darlington Local Plan, this material is now significantly out of date and does not reflect current national policy, guidance or market conditions. Taylor Wimpey are also concerned that the Sustainability Appraisal does not appear to have adequately considered reasonable alternatives. Although described as a scoping exercise, it has been prepared alongside what appears to be a preferred approach, which raises concern that the Sustainability Appraisal has not been undertaken in an iterative manner, contrary to the requirements of the Framework. The Local Plan does not seem to have explicitly considered the evidence from the Housing and Economic Land Availability Assessment and no assessment of best alternatives has been conducted.In this context, Taylor Wimpey considers that the Local Plan Review must more fully and explicitly respond to the 2024 National Planning Policy Framework, particularly in relation to ambition, growth and the requirement to positively plan to meet identified development needs. See submission for further comments.	Range of evidence base documents not available or published.	Evidence Base will be published alongside Reg19 plan.	No	
LPR105a	General	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leed, WF 2AB 01924873873 07841 621218	General					Taylor Wimpey are concerned that the Regulation 18 consultation has not been supported by the publication of an updated evidence base to justify the conclusions reached in the Local Plan Review. If the Council is relying on the evidence base that underpins the adopted Darlington Local Plan, this material is now significantly out of date and does not reflect current national policy, guidance or market conditions. Taylor Wimpey are also concerned that the Sustainability Appraisal does not appear to have adequately considered reasonable alternatives. Although described as a scoping exercise, it has been prepared alongside what appears to be a preferred approach, which raises concern that the Sustainability Appraisal has not been undertaken in an iterative manner, contrary to the requirements of the Framework. The Local Plan does not seem to have explicitly considered the evidence from the Housing and Economic Land Availability Assessment and no assessment of best alternatives has been conducted.In this context, Taylor Wimpey considers that the Local Plan Review must more fully and explicitly respond to the 2024 National Planning Policy Framework, particularly in relation to ambition, growth and the requirement to positively plan to meet identified development needs. See submission for further comments.	Range of evidence base documents not available or published.	Evidence Base will be published alongside Reg19 plan.	No	
LPR125&126a	General	Josh White	Natural England		Section			Habitat Regulations Assessment	Neutral	The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary. Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.	The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.	Comments noted and HRA has been undertaken. Offer of support welcomed.	No	None

LPR125&126q	Site Allocations	Josh White	Natural England		Section			Land Allocations	Neutral	In accordance with the paragraph 181 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.	In accordance with the paragraph 181 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.	Comments noted and the SA and HRA do take the listed considerations in to account when assessing and allocating sites.	No	None
LPR038	General	Melanie Lindsley	The Coal Authority		Section			Introduction - Paragraph 1.6.1	Neutral	Email submission. Based on the information we hold there is a small area of coal mining legacy along the northern edge of the Borough, west of Newton Aycliffe and south of Shildon, it appears to lie outside of the urban area and the places where new development is likely. Due to its limited nature, we would not be seeking inclusion of a policy specifically relating to coal mining legacy. We are however pleased to see that reference is made to the Tees Valley Joint Minerals and Waste Plan and that reference is made in the plan to the Coal Authority's coal legacy and coal resources information. As you are aware any formal planning application submitted for development in areas where recorded coal mining features are present at surface and shallow depth should be supported by a CMRA, which will make an assessment of the risks posed at that time. In light of the above we have no more detailed comments to make in respect of the draft Local Plan.	Highlight a small area of coal mining legacy. Not seeking a policy relating to coal mining legacy due to the limited nature. Welcome reference to the minerals and waste plan.	Comments noted	No	None
LPR051t		Chris Martin	HBF		Section			Monitoring	Neutral	The HBF recommends that the Council includes an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported. This should also include the targets that the plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provides details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.	The HBF recommends that the Council includes an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported. This should also include the targets that the plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provides details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.	Comments noted. A monitoring framework is to be included in the REG 19 plan.	Yes	Monitoring Framework
LPR084c	Sustainable Design and Climate Change	Tony Gillam	Resident		Section			4. Sustainable design and climate change	Object	While some brownfield allocations are welcomed, key sites such as Rolling Mills and Garden Street remain unallocated. Opportunities for positive change of use—Skinnergate, Binns upper floors, Wilkinsons/multi storey car park—should be pursued. Employment land near the Auction Mart is unsustainable due to car dependency and poor connectivity. New employment sites must meet higher standards, including insulation, renewables, battery storage, green roofs, and rainwater harvesting.	Some brownfield allocations welcomed but some key sites remain unallocated and opportunities for positive change of use in town centre should be pursued. Employment land near Auction Mart unsustainably located and new employment sites should meet higher standards.	Comments noted. Many of the site referenced are located within development limits so can still be brough forward for development.	No	None

Combined Officer Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)

1. Failure to comply with NPPF in assessing Local Green Spaces

In relation to the assessment process there is no set way of doing this. Each local authority has to set it's own methodology to assess Local Green Space (LGS) submissions.

Darlington Borough Council first published a LGS assessment methodology in February 2018 and have used the same methodology to inform the adoption of the Local Plan in 2021 through to the current review. We have not received any comments previously that the methodology, assessment criteria or it's implementation are flawed.

Numerous iterations of the assessment report have been issued in June 2018, January 2022 and most recently in March 2026. Significant opportunities have also been offered for sites to be submitted for consideration throughout this time and all submissions have been subject to the same assessment process.

We are therefore confident the Council has done all that is necessary to comply with national policy and associated guidance.

2. Lack of transparency in LGS Methodology

The methodology used by Darlington Borough Council is considered to be very transparent. As set out above we have issued numerous update reports and offered multiple opportunities for sites to be submitted for consideration. Anecdotally, we have been contacted by a number of authorities looking to adopt a similar approach and methodology having seen ours.

The site assessments are undertaken by the council's Principal Planning Policy Officer who also produced the methodology. Reports are presented as supporting evidence at key stages of plan preparation.

An assessment of this nature is subjective but through a consistent application of a robust methodology we are confident this approach is appropriate.

3. Potential bias in assessment process

We strongly contest any accusations of political bias in the assessment process. The other sites (Tommy Crooks Park and Bellburn Field) recommended for inclusion at this stage in the review are clearly very different in nature. One is a clearly defined park and the other is an area retained and enhanced after development on the remainder of the site.

Who submitted these sites has had no bearing on the conclusion of the assessments.

4. Lack of consultation

The Local Planning Authority has undertaken consultation in line with the requirements of plan making legislation and it's own Statement of Community Involvement (SCI). Interested parties were notified directly and comments received have been considered in preparing the next 'submission draft' of the plan which will be subject to a further consultation period of at least six weeks in due course. Comments received at this stage will be passed directly to the nominated planning inspector to determine if the plan is legally compliant and sound.

5. Brownfield sites should be prioritised o greenfield sites such as Tees Grange Farm

We agree and the plan does encourage the development of brownfield land where possible. However we need to produce a plan that is deliverable and can meet the borough's housing needs. In reality many brownfield sites in the borough are currently not financially viable.

6. Impact on the operations o the neighbouring Northumbrian Water Treatment Plant

Discussions are ongoing with Northumbrian Water on this matter as part of the current application process. No objection has been received to the local plan proposals at this stage.

7. **The site will not be able to provide sufficient Biodiversity Net Gain**

All sites now have to demonstrate a mandatory 10% Biodiversity Net Gain. At application stage this will need to be demonstrated that it can either be met on site or if this is not possible off site contributions may be necessary.

8. **Concerns of overlooking existing properties**

This detail will be considered at application stage. Protecting residential amenity of existing and new residents is a key priority of the planning process.

9. **The site is 'greenbelt'**

Darlington does not have any designated greenbelt.

10. **The council should be tackling empty homes first**

Officers maintain a database of empty residential properties to gain a better understanding of the reasons behind this. Owners of privately owned empty homes are encouraged to bring them back into use by providing an investors list of potential buyers, keen to purchase empty properties in the borough. Officers also use a range of enforcement powers to target and bring problematic properties back into use, through cross departmental working, focussing on those empty for more than two years. More broadly we are looking to review the Council's regeneration policy for empty properties across the town.

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