

LPR reference (start)	Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Site Details	Policy Details	Section Details	Object /Support/ N	Comments	Comment Summary	Officer Response	Change Required Yes	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Tees Valley Local Nature Recovery Strategy has not yet been published and the Sustainability Appraisal refers to the out-of-date Tees Valley Biodiversity Action Plan, the Strategic Environmental Assessment is work in progress and the Habitats Regulations Assessment is still to be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 additions 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 refer to 'tributaries of the Skerne and Tees'. Further objectives also recommended.	Support the inclusion of 'tributaries'. 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-Q01-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 sufficient 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 strengthened within the objectives.	Yes	
LPR061b	Vision, Aims and Objectives	Councillor Kate Mann	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 amount of housing to meet the boroughs needs. This will need to be demonstrated and tested through robust evidence.	No	

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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 & 60i	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 unnecessary 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 81 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 unnecessary 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 assessed 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 5B2	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 assessed 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 enforcement process.	This is a separate process in planning not relevant to the Local Plan.	No	
LPR095h	Sustainable Development	Karl Everitt	Allure Developments	Lee Fulcher, DPP Planning, Studio 14, Heylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppuktd.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 effective 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 unnecessary 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 assessed on the content of the current NPPF.			
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 unnecessary 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 assessed on the content of the current NPPF.			
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 Sustainable 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-nig 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 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 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 unnecessary 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 assessed on the content of the current NPPF.			
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 hierarchy to protect rural villages and countryside.	Support noted.			
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 hierarchy but recommends a level of flexibility.	The plan as drafted is flexible and sets out in other policies where development outside of the settlement hierarchy may be permitted.			
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, recognising 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 growth.	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.			

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 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' development 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 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 Hierarchy 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 hierarchy 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 Consciffe 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 Heslington (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		

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	S.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 S.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) S.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 S.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. S.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. S.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 hierarchy needs to be underpinned by updated evidence to demonstrate it remains sufficient. A more flexible approach may be needed to sustain growth.	Further evidence will be presented and reasonable alternatives considered in the sustainability 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) S.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 S.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. S.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 hierarchy needs to be underpinned by updated evidence to demonstrate it remains sufficient. A more flexible approach may be needed to sustain growth.	Further evidence will be presented and reasonable alternatives considered in the sustainability 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 Villages, 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 regard 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 hierarchy 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 differentiation 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 to the west of the A1(M).	Further evidence will be presented and reasonable alternatives considered in the sustainability 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 differentiation should be provided between land beyond development limits 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 5B2	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 Consciffe 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, Leeds, 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, Leeds, 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 undertaken 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@wardadawa y.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@wardadawa y.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 Stresholme 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
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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 Skerringham 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 Skerringham 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 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 5B2	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 Conscilife 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 non-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 Skerringham 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, Spawfords 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 Skerringham 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, Spawfords 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 Skerringham 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 proposed to part b with through the use of should is considered 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 5B2	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 embankers. 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 set 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 to a 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 sufficiently 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 sufficiently 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 should 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 Ministerial 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 implementation period for developers to follow (with full rollout by March 2028). The Council will therefore 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 requirement 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 (2025) 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 references 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 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.
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 panels 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 5B2	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 16f) which requires plans, and by association, policies, 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 Conscliffe 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, Leeds, 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, Leeds, 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 (JUN 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 sufficiently clear what the best practice in sustainable 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 5B2	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, policies, 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 considered to be an appropriate 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	Tivot 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 should 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 controlled 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
LRP133a		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
LRP133a		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 undertake 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.
LRP037a	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
LRP049	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 simply 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. I think 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 as 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 simply 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. I think 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 as 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	
LRP049c	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/h	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 guarantee 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 over 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 premises.	Support for limits on hot food takeaways noted. Healthy new town principles are reflected 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 accessible 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 necessarily 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 it 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 necessarily 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, Leeds, 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 necessarily the final report that is of particular value. A sustainability appraisal is not considered the appropriate way to consider health 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, Leeds, 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 necessarily 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 guidance 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 traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. AP5 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 impact 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 necessarily 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	

UPR reference (starting topic)	Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Site Details	Policy Details	Section Details	Object /No	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
UPR021	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 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 7,382 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, 29. The Government's intention in the NPPF has remained consistent between both the adopted Local Plan and the emerging Local Plan Review, that is that local planning authorities should 'significantly 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 beyond 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 housingbuilding. 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 balance 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 will lead to unsustainable patterns of development. 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 significantly 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
UPR032	Housing	Richard Cowen	CPRE Durham		Policy		H1 - Housing Requirement (strategic)		Object	As we have previously mentioned in relation to Policy S02, 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, Haglington and Haverhill). These villages have already been extended beyond what is reasonable. In our response to Policy S02, 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 S02 in villages which have already seen excessive development. We fully support the restrictive content of Policy S02 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 S02 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	
UPR041a	Housing	Mr J N & Mrs N J Swinbank	Andrew Moss, Ward Highway LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 2DN Tel: 07888781620 andrew.moss@wardandawson.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 S01) will be supported..." In support of the above a planning application at Neasham Nursery, Neasham, a site outside development limits, was approved in 2024 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	
UPR044a	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 which applications will not be considered. Large sites are a risk for mortgage lender over exposure, reducing competitive lender offers, hence build rates. 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 LA.	No	
UPR053	Housing	Patricia Meredith	Resident		Section		H1 - Housing Requirement (strategic)	B. 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 LA. A small site windfall allowance is factored into the housing trajectory. An appropriate housing mix is encouraged on sites via policy H13 (Housing Mix). Requirements in the policy for M412 and M413 standards also assist in meeting the housing needs of older persons and those with disabilities.	No.	
UPR059 & 60c	Housing	Dominic Crowley	LSMfields		Policy		H1 - Housing Requirement (strategic)		Object	It is acknowledged that the Council are reducing their minimum housing requirement from 492 dwellings per annum (660) to 446dps (net) over the revised Plan period from 2025 to 2042, meaning a revised total net minimum requirement of 7,383 over the new Plan period, compared with 9,840 dwellings under the current Local Plan. Hollin 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 526dps). 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

JPR067 & 065e	Housing	Nick Peasant	Station 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 2034 within the Draft Plan, is unsound and not appropriate where 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 5,840 dwellings up to 2036 to 7,382 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 OBC 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 OBC 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. OBC 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 OBC 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 up to 2034 within the Draft Plan, is unsound and not appropriate where 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 full 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).	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.	
JPR067 & 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 7,382 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 9,940 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 a 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 aspirations to significantly boost the supply of homes. The adopted standard method 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).	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.	
JPR071g	Housing	Dale Morris	Homes by Esh	Joe Higgins, Heddon Planning Services, Tamers Burn Business Park, Burn Lane, Healden, W646 9BU jcm@heddonplanning.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 7,382 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 9,940 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 LHN 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 Regeneration Act (2023) seek to resolve the issue of nutrient neutrality by 2030 at the latest, it is anticipated that lower completion 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 LHN, 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 propose 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 the housing requirement.	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).	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
JPR087h	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Leazes, Newcastle Heald, Newcastle upon Tyne NE4 1SE	Policy		H1 - Housing Requirement	Object	It is acknowledged that, through the Local Plan Review, the Council proposes to amend Policy H1 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 9.3%. 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-008-20241212 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-009-20241213). 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 OLP, 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 set the 446 figure as the housing requirement."	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 government's 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 account 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).	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
JPR092h	Housing	James Reid	Miller Homes	Steven Longstaff, ELS Planning, Gateway House, 15 Concliffe Road, Darlington, DL1 7EH 0775597066	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 annum 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 2019/20. 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" for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth that not normally have to be thoroughly justified as 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 additional homes per year also allows for increased net immigration (20 households a year). This would allow the working age population to be sufficient to meet demand for 2,000 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 areas, 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 3.8.3 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 15 year plan requires suitable locations to grow the economy, which are identified through the Local Plan 2015-2042 2015-2016. This equates to 480 jobs per annum with a total of 360 jobs per annum calculated in the Employment Land Needs Report (2017) which informed the current adopted Local Plan (2015-2016)".	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 unsuitable 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 permission and no evidence provided to support their deliverability. Further sites should be included to ensure the housing requirement is met, including Miller's site at Addington 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.	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.

UPR05c	Housing	Karl Everitt	Altire Developments	Lee Fultcher, DPF Planning, Studio 14, Hayfields, St Thomas Street, Newcastle upon Tyne, NE1 4LE lee.fultcher@dpfpld.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 updates for 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.	H1 is considered to be in accordance with the NPPF. It largely retains the wording of the currently adopted policy, with an update for 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.
UPR102a	Housing	Kevin Ayrton	Story Homes Ltd	RLG Planning, 35 Coniscliffe Road, Darlington, DA3 7EH			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 growth vision and commitment to support 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: "1.2.6 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	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 soundly based on examination. Economic aspirations have not changed and as such it is inappropriate to plan for the minimum LHM. 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 the housing allocations are proposed in Hurnworth (service village) and with the mix of sites put forward. There is a reliance on large scale allocations. Site put forward at Neasham Road, Hurnworth is the best / most sustainable of all the sites that have been considered in and around Hurnworth.	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 within 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.
UPR103a	Housing	Duncan Peake	Raby Estates	Hanna Maxwell, Pegasus Group, First Floor, Gainsborough House, 34-40 Emry Street, Newcastle upon Tyne, NE1 4AE	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 7,382 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 ratios does 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.
UPR104	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfworth, Planner & Architects, Junction 41 Business Court East Ardley, Leeds, WF 24B 01924873873 07841 612125	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 (LHM) 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 LHM 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 Whilst 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, and 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 S23 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 significantly 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 LHM. Concern with the housing land supply and overly optimistic delivery rates attached 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 Berrywood 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.
UPR105	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfworth, Planner & Architects, Junction 41 Business Court East Ardley, Leeds, WF 24B 01924873873 07841 612127	Policy		H1 - Housing Requirement	Unknown	Taylor Wimpey acknowledges that the Council proposes to utilise the standard method Local Housing Need (LHM) 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 responses - please see submission. To address the comments, the following approach is proposed: • Support the need for a buffer for flexibility. • Need to update the LHM 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 LHM 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. Justification 10.1 National policy is clear that, in order to support the Government's objective of significantly 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	See above	See above	Yes	See above
UPR110b	Housing	James Sealby	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 the Council are now seeking to suppress 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 Burnlee Garden Village and 90 dwellings at Starmington 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 delay to housing delivery at Starmington 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 suppress 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.

LP113 & 114f	Housing	Rachel Coates	Belfray Homes	Rachel Coates, Stancic	Policy			H1 – Housing Requirement (strategic)	Object	Belfray 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 5,840 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. Belfray 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. Belfray considers this strategy to remain sound and sees no compelling justification for retreating from this position. Belfray 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 Belfray 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 Belfray 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 supported. This provision introduces important flexibility into the wider housing strategy and is acknowledged by Belfray 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 15).	Yes	Amend the housing requirement figure within policy H1 to 490 net additional dwellings per annum.
LP107f	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, 31 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BE	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 5.8ha additional over and above the 0.83 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 between 1,250 - 1,500 dwellings. Reference to a reduction in the housing requirement from 492 dwellings per annum to 446. Increase in reliance placed on allocated sites and importance of these sites to achieve sufficient supply and meet the context of a reduced housing requirement. Clarification requested on how the Council has calculated that 400 homes will be delivered during the plan period up to 2042 and the 460 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 gradually evidence a deliverable five-year housing supply in accordance with the National Planning Policy Framework."
LP111 & 112j	Housing	Ben Westwood /	Barratt David Wilton Homes	Savills UK Ltd, The Lumen, 31 James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5BE	Site	100 Hall Farm, Brankensome		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 critical 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 at 400 dwellings will come forward within the Local Plan Review period up to 2042. Support given for these timescales. Barratt David Wilton Homes are looking to secure a timely planning permission at the site and commence works as soon as possible.	Comments noted.	No.	
LP1023c	Housing	David Phillips	Butterfly Conservation North East		Site	251 Skerringham		H2 – Housing Allocations (strategic policy)	Neutral	The scale of committed development and the number of proposed new dwellings including Skerringham 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 Skerringham Garden Village. Negative impacts on the countryside, environment, landscape and quality of life. Development on the rural-urban edge will 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	
LP104	Housing	David Marjoram	Mandale Homes	David Marjoram, EDC Planning, Gateway House, 55 Conscilife Road, Darlington, DL3 7SD 01323 469236	Site	392 Elm Tree Farm		H2 – Housing Allocations (strategic policy)	Support	These representations have been prepared by EDC 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 20no. dwellings (this includes the Council owned land) (ref. 25/00022/FREAPP), 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 130 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 ratio 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 4no. dwellings per annum until 2031, with 20no. delivered in 2032/32. 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 viable. Increase in site yield from 150 to 200 dwellings supported. Delivery proposed in the housing trajectory also supported.	Comments and support noted.	No.	
LP127, 128 & 129u	Housing	Nos Kan	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	
LP1025	Housing	Kathleen Robinson-Tregear			Section	403 Blackwell Grange East		H2 – Housing Allocations (strategic policy)	Object	I am writing as a resident of the Green Park / Greenmount Road / Conscilife Road area to formally object to the Draft Local Plan Review (2023-2042). Having reviewed the Policy Map 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 Conscilife Road and towards Barton. The current road network offers limited and inefficient access to the A166, 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 A166, 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 regression 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 mitigation 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 Conscilife Park North and South. Existing residential areas are protected through policies such as DC1 Sustainable design principles and H2.5 Safeguarding Amenity.	No		
LP1042	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 well-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	

JPR047a	Housing	Phillip Greer	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	object to the draft revision of the Darlington Borough Council Local Plan Review (2023 - 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 16227 Tees Grange & Site 467 Tees Grange in Council documents), 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 8 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 16227 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 BBC by residents. How when you concretise 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. 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 use and is not just grazing land. Public opinion has not been taken in to 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
JPR050	Housing	Jon 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 a 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 use and is not just grazing land. Public opinion has not been taken in to 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
JPR057	Housing	Mark Clayton	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	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 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. Lots 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
JPR063	Housing	Jon 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 part of 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 part of local.	See combined 'Combined Officer' Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)	No
JPR066	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 Northbarian Water announced sewage handling was aimed at completion 3. Using the site access to the site it has been for dog walking, recreation and exercise by myself and many others in the 40 years we 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 12. 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 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 Concliffe and Stanrop Road? in my opinion absolutely not.	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 pollution 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
JPR070	Housing	R Bradshaw	Resident		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	I have been here and then supplemented with root crops (turnips), as it doesn't produce enough grass 12. 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 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 Concliffe and Stanrop Road? in my opinion absolutely not.	Objection to the allocation of site 467 Tees Grange. There is too 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 Concliffe Park.	See combined 'Combined Officer' Response to Reg. 18 Comments relating to Tees Grange Farm (Site 467)	No
JPR073	Housing	Peter and Margaret	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 adequate 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
JPR088	Housing	Heleen Rondo (petition submitted providing approximately 513 signatures)	Hummerknott 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 a 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 government. 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 Balburn 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 characteristics. (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 W&L 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 evidence 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
JPR1206	Housing	Councillor Bryony McIntyre	Darlington Green Party		Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)		Object	3. 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 (similar desirable downsizing opportunities are most lacking in an area where home-ownership is the biggest problem - so the site proposals aren't currently meeting local needs), 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
JPR127, 128 & 129a	Housing	Reo Kan	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 Concliffe Road Waterworks. This is a Scheduled Monument and prominent local landmark. The Scheduled Monument is south of Concliffe Road. The site is located to the north of an existing housing development (Concliffe Meadows) also accessed from Concliffe Road. The site has archaeological potential. DBC should consider whether a HIA is necessary. This should include any NDA's falling within the site or close to it, and consider the proximity to the Scheduled Monument and the archaeological potential identified. Concliffe Meadows 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 Concliffe Road Waterworks. This is a Scheduled Monument and prominent local landmark. 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 NDA's 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 assessed the likely impacts on the Scheduled monument we do not consider the proposal will have a significant enough impact to require a Heritage Impact Assessment. Further design guidelines to be included.	No
JPR130	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 objectives. 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

		John Rondo	Resident	Site	467 Tees Grange	H2 - Housing Allocations (strategic policy)	Object	My complaints are mainly against the inclusion of Site 467 Tees Grange / 10527 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 this site are very much reflected in the objection I submitted on behalf of the Hummerskott 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 26 of the tracked draft plan paragraph 491 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 council's 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 brownfield sites. Paragraph 3.0.3 states that "Failure to respect the scale and function of places can lead to inappropriate development". Paragraph 3.1.1 reflecting the NPPF "reinforces that settlement '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 state 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 Hummerskott 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. Communities should decide LGS designations. The consultation 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 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 & 129a	Housing	Nos 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 NODHA. Any site as 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 & 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 of 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 NODHA. 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 Brynley Holroyd	Darlington Green Party	Site	471 Land east of Maudendale (Former Irgemum Parc)	H2 - Housing Allocations (strategic policy)	Object	A We raise concerns over the allocation of Irgemum 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 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 Maudendale (Former Irgemum 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 & 129b	Housing	Nos Kain	Historic England	Site	471 Land east of Maudendale (Former Irgemum 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 minimalised 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 RFA65. 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 allocated 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 S608 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 line of the employment allocation. Design Code requirement should be added to the site requirements including any recommendations of the HIA. Consider whether the S608 walking and cycling route can be incorporated into the site layout.	Site ref 471 Land east of Maudendale (Former Irgemum 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 allocated 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 S608 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 & 129a	Housing	Nos 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 reference number is 504. The site area is 30.28 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 allocation / housing commitment. Phase 1 - 700 units. Phase 2 reference number is 504. The site area is 30.28 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	
LPR052	Housing	Louise Tat	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 8 East of Skerne Park. The site operated and closed Pre COP9 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 8 East of Skerne Park). The site operated and closed Pre COP9 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
LPR104a	Housing	Andrew Rose	Taylor Wimpey	Site	85 Land at Concliffe Road, Low Concliffe	H2 - Housing Allocations (strategic policy)	Object	Concerns raised with policy H2 and the narrow range of sites allocated. Alternative sites at Berrymead Farm and Concliffe 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 boundaries via policy S23. 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 delay 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 Concliffe 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 number 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 the year and there is clear evidence to support this. Such as development progress and clarification from house builders and partners. If a site is categorised 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 quantitative need for site at Berrymead Farm. The Concliffe Road site is not considered suitable as it is essential for maintaining the openness of the area and separation of Low Concliffe, Merrybent and the main urban area.	No	
LPR005	Housing	Karl Exvrett	Allure Developments	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 include 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. <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>
LPR041d	Housing	Mr J N & Mrs N J Swinbank	Andrew Moss, Ward Highway LLP, Sandgate House, 102 Quaydock, Newcastle upon Tyne, NE1 5TA Tel: 01915876420 andrew.moss@wardandawaya.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 I 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 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 do this. 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 MWM 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 number of new homes can often be best achieved through planning for larger scale development. This is the approach the Council is taking.	No	

JPR044b	Housing	Vanessa			Policy		H2 – Housing Allocations (strategic)	Object	Site Allocations Ingium Park: concern that this (8 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 Madendale (former Ingium Park). 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	
JPR022	Housing	Michael Drysdale	N/A		Policy		H2 Allocation (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 being poorholes, 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 can't 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 mitigation schemes to ensure developments do not have an unacceptable impact on the local and strategic highway network.	No	
JPR028	Housing	Lee Whitmore		Section		H2 – Housing Allocations (strategic policy)	6. Housing	Object	I am a resident of Burnlee 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. Burnlee 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 pathways 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 pathways 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 ensuring 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 Burnlee 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 Burnlee 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 mitigation schemes to ensure developments do not have an unacceptable impact on the local and strategic highway network.	No	
JPR028d	Housing	David Phillips	Butterfly Conservation North East		Policy		H2 – Housing Allocations (strategic)	Object	Items 6.5.1-6.6.3 Policy H4 & H6. The scale of committed development and the number of proposed new dwellings including Burnlee Garden Village, Skertingham Garden Village and Consciffe Park is noted. These developments on the local 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 significantly increasing pressures 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 new 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 ahead at the above places and at Madendale, Burnlee and Snipe Lane close to existing Local Nature Reserves.	The housing development committed on the rural-urban edge of Darlington (Burnlee GV, Skertingham, and Consciffe 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 Madendale, Burnlee 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	
JPR054g	Housing	Chris Martin	HBF		Policy		H2 – Housing Allocations (strategic)	Neutral	The HBF does not comment on specific housing allocations, although the Council has tried 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 the delivery of homes by Small and Medium Enterprises (SMEs), which 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 4,654 dwellings. This figure comfortably exceeds the minimum LHM figure in Policy 17 (3,582 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."	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 the 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."
JPR059 & 60d	Housing	Domonic Crowley	LeMeds		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. 'Hafam Land with to raise concerns in this respect. Hafam Land have previously highlighted the development opportunity on their land to the west of Roundhill Road in Hurworth (SHAA 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 (SHAA 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	
JPR064 & 065f	Housing	Nick Pleasant	Stannec on behalf of Veity		Policy		H2 – Housing Allocations (strategic)	Object	In line with their position on Policy H1, Veity strongly objects to the direction chosen by DMC in relation to its overarching housing strategy, including the approach set out in Policy H2. Policy H2 states that the land allocations proposed 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. Stannic analysis of the Housing Allocation 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 Burnlee Garden Village (Formerly Greater Faverdale), Skertingham, 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, Veity 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.	Objection 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 if new housing allocations are proposed. The Council considers that a sufficient range of sites have been identified 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. 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	
JPR067 & 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. These small to medium sized sites should be considered from within 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 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	

UPR067 & 681	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 Omsdale 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 Omsdale 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 utilising 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: 19/00233/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 Stail. 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. She previously refused for outline permission 19/00233/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 Stail 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		
UPR071a	Housing	Dale Morris	Homes by Esh	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 Mandendale (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 Mandendale (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 8. Site 467 access involves the demolition of an existing property on Concessiffe Road. The policy map should be amended to illustrate this and the allocation statement in appendix 8 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 Pwenderale 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 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 Mandendale (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 employment 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 8 allocation statements. Alter site area for 467 Tees Grange to be in line with the current planning application and update the associated allocation with the access proposed. Update site area for 471 Land east of Mandendale (former Ingenium Parc) as suggested and update allocation statement.
UPR089	Housing		Karbon Homes	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 resilience in the housing 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 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 (Barnburgh and Burtree CV). 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		
UPR072g	Housing	James Reid	Miller Homes	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 sites over other options. One of the sites (417 - Land east of Mandendale) 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 de-allocation 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 sites over other options. Concerns raised with housing allocation 417 Land east of Mandendale (former Ingenium Parc) given the adjacent Cummins Engine Factory is looking to expand (25/01406/RM1) and there is no evidence to support de-allocation 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		
UPR096	Housing	Jeremy Good	ELG Planning	Section	G. 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-build 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 these 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-build 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		
UPR102b	Housing	Kevin Ayrton	Story Homes Ltd	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 – Riverside Street Car Park Regeneration Area (indicative yield of 125 dwellings) 471 – Land east of Mandendale (former Ingenium Parc) (indicative yield of 450 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 Riverside Street Car Park Regeneration Area (Site 468) is an adaptation of the current allocation/consent, 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 Mandendale) 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 471 Land east of Mandendale (former Ingenium Parc) given the adjacent Cummins Engine Factory is looking to expand (25/01406/RM1) and there is no evidence to support de-allocation 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		

JPR104k	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfords Planner & Architects, Junction 41 Business Court East Ardley, Leam, WF 24B 01254873873 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 lists 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 S03, 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 1.7 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 allocations to evidence that alternatives have been considered or that this is the most appropriate spatial strategy. Allocation of only 11 sites is a narrow and inflexible approach. S03 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 anticipated trajectories. There should 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 Berrymead Farm (HELAA site ref 49) and Consciffe Road (HELAA site ref 83).	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 83 was not considered suitable as the site is essential for maintaining the openness, separation and individual identity of Low Consciffe from the Darlington Urban Area and Marnham.	No	
JPR105k	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfords Planner & Architects, Junction 41 Business Court East Ardley, Leam, WF 24B 01254873873 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 lists 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 Consciffe 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 S03, 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 Consciffe 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	
JPR107b	Housing	James Litherland	CityHeart	Jeremy Good, EIG Planning, 013 704 71212465236, jeremy@gigplanning.co.uk	Policy		H2 – Housing Allocations (strategic)	Object	CityHeart supports the inclusion of Kendrew Street Car Park Regeneration Area within the redrafted policy. 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 general deliverability of the scheme.	Support for the inclusion of site 468 Kendrew Street Car Park Regeneration Area within the redrafted policy. H2 that yields are indicative. Additional wording would be acceptable for the allocation statement of site 468 to allow some flexibility in what is proposed for allocation for mixed use development with an indicative yield of 125 dwellings, including complementary commercial development and potential for specialist housing.	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 what is proposed for allocation for mixed use development with an indicative yield of 125 dwellings, including complementary commercial development and potential for specialist housing.	Yes	Update appendix B allocation statement for site 468 Kendrew Street Car Park 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 complementary commercial development and potential for specialist housing.
JPR113 & 114g	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stanlec, 013 704 71212465236, rachel@stanlec.co.uk	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 proposed for within the adopted plan which has been adopted for the period to 2042, and as such no additional large scale housing allocations have been proposed. Stanlec'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 Greater Fawcetts), Sarningham, 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 Stanlec 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 remains 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 undeveloped 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 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.	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 yet 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 in 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 Ties Grange, 468 Kendrew Street Car Park Regeneration Area and 471 Land east of Mainsdale (former ingenuum Parc).	No	
JPR113 & 114i	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stanlec, 013 704 71212465236, rachel@stanlec.co.uk	Section		H2 – Housing Allocations (strategic)	S. Housing	Representation of the land North of Burtree Lane - see submitted document.	Alternative site proposed for allocation - site ref 466 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 suitably located. Located adjacent to existing commitments and allocations (Berrymead Farm, Burtree Lane, Burtree CV, Sarningham). 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 existing main urban area which will meet housing needs. As such this site has not been proposed for allocation.	No	
JPR113 & 114v	Housing	Rachel Coates	Bellway Homes	Rachel Coates, Stanlec, 013 704 71212465236, rachel@stanlec.co.uk	Policy		H2 – Housing Allocations (strategic)	S. Housing	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 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, Sarningham and Burtree CV).	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 is not development land supply. The site is 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, Sarningham and Burtree CV).	No	
JPR115f	Housing	Emma Williams	Church Commissioners for England - Diocese	Emma Williams, Deloitte, 013 704 71212465236, emma@deloitte.co.uk	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 be the case at Half Farm, Brankome, as a housing 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. Half Farm, Brankome, 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 380 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 timescale for delivery in line with the revised Local Plan period.	Church Commissioners support the retention of site 100, Half Farm, Brankome 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	

FR121	Housing	Richard Morgan	C Planning Ltd	Section		H2 - Housing Allocations (strategic)	B. 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 it 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 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 adaptable 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 flexibility 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 and West of Roundhill Road site 3 proposed for allocation. Positive aspects of this are referenced. Development will support the vitality and viability of the service village. The existing access can be made to adaptable 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 a development progress and clarification from house builders and partners. Three additional housing allocations are proposed in the Draft Local Plan: site 467 Tees Grange, 488 Kendrew Road Car Park Regeneration Area and 471 Land east of Mandemdale (former Ingham 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 H5.	No		
FR D64 & O651	Housing	Nick Pleasant	Santec 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 (MA2) and wheelchair user dwellings (MA3) 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 (MA2) and wheelchair user dwellings (MA3) 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 MA2) and MA3) requirements will be published prior to the next stage of plan preparation (Reg 19).	No		
FRD51h	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 MA2) accessible and adaptable standard is proposed to increase from 45% to 57%, while those built to MA3) 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 PPS tests are met in this case (Reference ID: 56-020-20150327). This includes: •The likely future need for housing for older and disabled people (including wheelchair user dwellings). •The site, 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 designed to meet Nationally Described Space Standards (NDSS). NDSS is an optional technical standard and the Council will need to justify its inclusion, with the PPS 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 MA2) and MA3) requirements noted. LHNA not published. The Council will need to ensure that all relevant PPS tests are met for these requirements including the impact on viability. The inclusion of the Nationally Described Space Standards will also need to be justified. The PPS require 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		
FRD59 & 60a	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 MA2) and from 9% to 9% for MA3). 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 MA2) and MA3) 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		
FRD67 & 68p	Housing	Seorgina 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 PPS 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 PPS 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		
FRD71	Housing	Sale Morris	Homes by Esb	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 MA2) 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 MA2) and MA3) requirements noted along with the inclusion that all new homes should meet Nationally Described Space Standards (NDSS). PPS require 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		
FRD79	Housing	Rosie Tunstade	Habitree Housing Association	Policy		H3 - Housing Mix		Object	Habitree strongly supports that the local plan includes accessibility design standards, specifically Building Regulations (MA2) and MA3). 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 B1 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 MA3) 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 Habitree's 2023 report with London School of Economics: Living not Existing) The benefits of MA3) homes are plentiful, and amongst them, new homes that meet category MA3) 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 £57,000 over a 10 year period. •Removes or reduces the cost of care assistance in the home •Increases 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 HDNA data), we are concerned by the decision to split the remaining provision between MA1) and MA2) standards. We strongly recommend that all new, non-wheelchair accessible housing be built to the MA2) Accessible and Adaptable standard. There is a common misunderstanding that MA2) 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 MA3) 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 MA2) and MA3) standards. All new, non-wheelchair accessible housing should be built to the MA2) Accessible and Adaptable standard. Framing MA2) as a specialist requirement rather than a universal necessity risks creating a future housing stock that is inherently exclusionary. Relying on MA3) to meet the needs of the majority is a short-sighted strategy. Designing homes to the MA2) standard at the point of construction is significantly more cost-effective than attempting to adapt a sub-standard property later. By ensuring all new homes are built to the MA2) 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 MA2) standard.	No		

JP087m	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lunnis, 31 James Boulevard, Newcastle Hebb, Newcastle upon Tyne NE4 5BZ	Policy		H3 - Housing Mix	N/A	Draft Policy H3 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 H3 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 test 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. Similarly, our Client notes references 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 H3 at this time, nor its compliance with the Housing: Optional Technical Standard: PPG (paragraph 007 Reference ID: 56-007-20150327), until such a time further information is made available. Additional inter alia test has also been introduced at the conclusion of Policy H3, 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 needs, 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 H3 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 H3 makes no provision for a transitional period, nor is there any evidence to indicate whether such transitional arrangements were considered and, if so, the reasons why they were not pursued. When these three matters are considered cumulatively, our Client considers that further works are required to be undertaken.	Draft Policy H3 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 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No			
JP092	Housing	James Reid	Miller Homes	Steven Longstaff, EIG Planning, Gateway House, 55 Conscillie Road, Darlington, DL3 7EN 07729397006	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% and 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 to the inclusions within the plan of such a requirement will need to be fully justified. The PPG also provides detailed guidance on the tests that need to be met for the accessible and adaptable 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 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 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No			
JP094d	Housing	David Marjoram	Mandale Homes	David Marjoram, EIG Planning, Gateway House, 55 Conscillie Road, Darlington, DL3 7EN 01325 465440	Policy		Policy H3 Housing Mix	N/A	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. 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% and 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 to 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 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 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No			
JP095a	Housing	Karl Everitt	Alure Developments	Lee Fulcher, DFP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4EL lee.fulcher@dfpuk.com	Policy		H3 - Housing Mix	Subject	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 18) 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 reflects 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			
JP104f	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforth, Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, WF4 2AB 01524873873 07841 321227	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. 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 revise the requirements if these are unable to be justified through evidence.	Comments noted. Prior to the next stage of plan preparation (Reg 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDSS and a whole plan viability assessment.	No			

		Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfords Planner & Architects, Junction 41 Business Court East Ardley, Leed, WF 2AB 028487373 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 constraints. 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 the 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 the 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	No			
LP107c	Housing	James Litherland	CityHeart	Jeremy Good, EIG Planning, 01254 460236, jeremy@eigplanning.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, topographical 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 standards can be dependent on the suitability and viability of the site. In relation to the application of NDS5, it is suggested that the word be amended to include a similar degree of flexibility to ensure delivery is not hampered by a blanket requirement to comply completely with NDS5. 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."	See above CityHeart are supportive of the policy and the flexibility in determining a suitable mix based on the sites location, topographical 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 standards can be dependent on site suitability and viability in relation to the application of NDS5, 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
LP108	Housing	Chris smith	Sheringham Estates Limited	Chris Smith, Lichfields, St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1DF 0191 2615885	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 2023), 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 23.5% which is considered to be significant given there is no clear evidence pointing to the need for this 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 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 18) further evidence will be published including a Local Housing Needs Assessment.	No		
LP111 & 112d	Housing	Ian Westwood / Barratt David Wilson Homes	Savills UK Ltd, The Lunan, St James Boulevard, Newcastle Heals, Newcastle upon Tyne, NE4 58Z	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 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 ('NDS5'), 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 NDS5 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 NDS5 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 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 been prepared to test the requirements within policy H3.	Comments noted. Prior to the next stage of plan preparation (Reg 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDS5 and a whole plan viability assessment.	No			
LP113 & 114i	Housing	Rachel Coates	Belway Homes	Rachel Coates, Stancic, Belway	Policy	H3 - Housing Mix	N/A	Belway 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. Belway 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 OBC 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. Belway 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. Belway would urge OBC 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.	Belway 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. Belway 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 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDS5 and a whole plan viability assessment.	No		
LP116b	Housing	Jack Conroy	Twist Wry Investments Ltd	Jack Conroy, South, The Lunan, St James Boulevard, Newcastle Heals, Newcastle upon Tyne, NE4 58Z	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 ('NDS5') 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 NDS5 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 NDS5 compliance within Draft Policy H3 is not justified in this regard. There is also no evidence demonstrating that potential implications of NDS5 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, 'timing' is not a 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 existing 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 18) further evidence will be published including a Local Housing Needs Assessment, evidence supporting the NDS5 and a whole plan viability assessment.	No		

PR115a	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 1) from 43% to 57% could impact viability of developments across the borough and should be fully analysed through a viability appraisal. Without 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 M4021 standard for accessible and adaptable homes from 43% to 57% could impact viability of developments across the borough and should be fully analysed through a viability appraisal. Without available evidence such as a 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 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	
PR102c	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Coniscliffe Road, Darlington, DA3 7DT	Policy		H3 - Housing Mix	N/A	It is noted that section 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 of this plan. The impact of the proposed changes to the viability of housing development on the viability of housing development across the borough, if necessary, the percentages will be altered within policy H3 to ensure the requirements 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	
PR123i		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumens, 31 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0195 1231146	Policy		Burtree Employment Park (Policy E2)	N/A	It is noted that affordable housing requirements remain at 20% for Brinkburn and Fawcetts, 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. HL/HfE 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 Fawcetts, 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. HL/HfE 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	
PR123j		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumens, 31 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0195 1231146	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 Fawcetts, 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. HL/HfE 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 Fawcetts, 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. HL/HfE 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 the 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
PR051i	Housing	Chris Martin	HfB		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 HfB 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 self 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 HfB 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 unsubstantiated by the Council. The HfB 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.	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 provided 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	
PR059 & 60i	Housing		Dominic Crowley Ltd/Hellens, St Nicholas Building, Nicholas Street, NE1 1BF	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. Halima Laid with to raise concerns regarding the wording of this policy as it 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 Halima Laid 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. Viaty 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 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, Viaty 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. Viaty 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 attachments.	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 referring 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 provided at the next stage of plan preparation (Reg 19).	No		
PR064 & 065i	Housing	Nick Peasant	Stantec on behalf of Viaty		Policy		H4 - Self Build and Custom Build Housing	Object	Viaty 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 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, Viaty 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. Viaty 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 attachments.	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. Viaty therefore fails to see how policy H4 is justified.	Further evidence on the demand for self build and custom build housing will be provided at the next stage of plan preparation (Reg 19).	No	
PR067 & 68i	Housing	Georgina Cox	Gladman		Policy		H4 - Self Build and Custom Build Housing	Object	Gladman does not support a self 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 provided at the next stage of plan preparation (Reg 19).	Further evidence on the demand for self build and custom build housing will be provided at the next stage of plan preparation (Reg 19).	No	
PR071k	Housing	Sule Morris	Homes by Esb	Joe Ridgdon, Widdley Planning Services, Tanners Burn Business Park, Burn Lane, Haslam, NE46 3BU joeridgdon@widdleyplanning.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 or 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 provided at the next stage of plan preparation (Reg 19).	Yes	
PR087n	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumens, 31 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ	Policy		H4 - Self and Custom Build Housing	Object	It is recognised that draft Policy H4 is a newly developed policy that elaborates from the text previously included at the end of adopted Policy H4.4. Draft Policy H4 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 6.5.1.1 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-build custom on schemes exceeding 150 units is removed. Alternatively a policy could be retained if it encouraged this type of housing and could be based on evidence of both viability and demand.	Further evidence on the demand for self build and custom build housing will be provided at the next stage of plan preparation (Reg 19).	No	

JPR04a	Housing	David Marjoram	Mandate Homes	David Marjoram, ESG Planner, Gateway House, 55 Concliffe Road, Darlington, DL3 7EH 01325 462421	Policy		Policy H 4 Self-Build and Custom Build Housing	Object	To confirm, Mandate 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.' Mandate 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 1500s, 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 Mandate 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 Mandate 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 1500s, 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 Mandate'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 provided 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.
JPR104m	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfords Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, WF 24H 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. 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 housing/building 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 larger, 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 undermine 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 the 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 provided 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.
JPR105m	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparfords Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, WF 24H 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 housing/building 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 larger, 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.	Yes	See response to comment 104m above.
JPR108a	Housing	Chris Smith	Sheringham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1PF 0131 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 Prior Request 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 would 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 Sheringham, our client has previously identified its intention 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 each phase.	See response to comment 104m above. Further evidence on the demand for self build and custom build housing will be provided 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.

PR111 & 112e	Housing	Ben Westwood / Barratt David Wilson Homes	Savills UK Ltd, The Lumen, 30 James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5B2	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 for 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 LHMN 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 developments yields have been undertaken to assess any impacts of a 1% threshold 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 LHMN 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 unsupported. 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 provided at the next stage of plan preparation (Reg 19).	No	
PR113 & 114e	Housing	Rachel Coates	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 LHMN 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. 1.4.1.3 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 resist 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 LHMN 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 requirement be justified.	Further evidence on the demand for self-build and custom build housing will be provided at the next stage of plan preparation (Reg 19).	No	
PR116c	Housing	Jack Conroy	Throst Way Investments Ltd	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 LHMN, which has not been published, and the Council's 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 unsupported, 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 local area/market area for self-build or custom build properties, thus negating the 1% requirement to be provided.	No evidence or justification behind the 150 units threshold or explanation if alternatives had been considered. Concerns raised as the supporting text describes limited demand with no detail published as to a link 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 provided at the next stage of plan preparation (Reg 19).	No	
PR102d	Housing	Kevin Ayrton	Story Homes Ltd	Policy		H4- Self-Build and custom build housing	N/A	It is noted that section 6.4.3 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 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	
PR119	Housing	Natasha Styles	MACARTHUR & STONE & CHURCHILL LIVING	Policy		H5 - 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. 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."	Background information submitted on older persons housing need. References to the NPFF 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	
PR123i		Martin Bonner	Helens Land and Homes England	Policy		H5 - Affordable Housing	N/A	It is noted that affordable housing requirements remain at 20% for Brinkburn and Fwerdale, 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. HLH/NE 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 Fwerdale, 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. HLH/NE 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	
PR203a	Housing	David Phillips	Butterfly Conservation North East	Section		H5 - Affordable Housing (strategic)	Support	6.5.1 & 6.5.3 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	
PR241d	Housing	Mr J N & Mrs N J Swinbank	Andrew Moss, Ward Hedwasy LLP, Sandgate House, 102 Quayside, Newcastle upon Tyne, NE1 3DN Tel: 07895878420 andrew.moss@warddawson.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 SLS Development Limits is appropriate and has previously been found sound in the adopted Local Plan.	No	

FP044c	Housing	Vanessa			Policy	HS – Affordable Housing (strategic)	Object	Affordable Housing Working changes shift it from social to affordable (80% of market rate) rents. This contradicts government policy for councils to offer more social rents, and reduce 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. Diagnose 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 HS, 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.	Object	Why should Hummersnot, 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 Tedhouse in fact went as far as to suggest DBC where planning gets it, and this practice must cease!	A number of concerns raised with policy HS. 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 built 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 HS 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		
FP049a	Housing	Ken Maddison - Resident			Policy	HS - Affordable Housing (strategic)	Object	Why should Hummersnot, 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.	Why should Hummersnot, 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 requirements in policy HS 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 HS. There are exceptions in policy HS to allow off-site delivery of affordable homes and this approach was found sound in the adopted Local Plan.	No				
FP051	Housing	Chris Martin	HRF		Policy	HS - Affordable Housing (strategic)	N/A	Policy HS 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: •15% 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 HRF 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 proportion 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 HS copies over the definitions of each of these tenures from the NPPF. Given that these definitions can slightly change over time, the HRF recommends that rather than copying the definitions, the supporting text should simply point the reader to the NPPF where the definitions are provided. This way, the supporting text can remain up to date throughout the plan period.	Changes to the tenure requirements within policy HS 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.		
FP053a	Housing	Patricia Meredith	Resident		Section	HS - Affordable Housing (Strategic Policy)	Object	Object to the shift from social rent to affordable rent (30% of market rate), which contradicts national policy encouraging more social rent provision. 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 HS 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				
FP059 & 60g	Housing	Nallam Land	Dominic Crawley, Lichfield		Policy	HS – Affordable Housing (strategic)	Object	Nallam Land note that Policy HS remains largely as per the adopted Local Plan albeit the tenure mix requirement has been updated for two of the three location areas. Whilst Nallam Land has no objection to this in principle, they wish to raise the following points: • It is 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				
FP062	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 GI 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 GI 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 of 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 GI 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 Magpie Farm, MSS (Adwode Grange) and Coniscliffe Park South.	No				
FP064 & 065k	Housing	Nick Pleasant	Starline on behalf of Vistry		Policy	HS – 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 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 HS. 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 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, 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				
FP067 & 68h	Housing	Georgina Cox	Gladman		Policy	HS – Affordable Housing (strategic)	Support	See submitted attachment. Gladman supports policy HS and the affordable housing requirements set out across the Darlington Borough.	Gladman supports policy HS and the affordable housing requirements set out across the Darlington Borough.	Support noted.	No				

JP075d	Housing	Sia 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 HS 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		
JP084	Housing	Tony Gillam	Resident		Section	Policy HS - Affordable Housing (Strategic Policy)	6. Housing	Object	Objection 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 it 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. Garden villages should require 30% affordable housing. Objection to the removal of the First Homes policy.	Draft policy HS 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	
JP087o	Housing	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, 51 James Boulevard, Newcastle Heils, Newcastle upon Tyne NE5 5SE	Policy	Policy HS - Affordable Housing	N/A	Object	Draft Policy H 5 remains largely unchanged, continuing to apply a stopped 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 changes to be made to the tenure split of the affordable housing requirement. The currently adopted Policy H 5 in the DLBP requires an even 50 / 50 split of affordable rent and affordable home ownership. Draft Policy H 5 proposes: • 15% 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 LHM and a WPA. The LHM would assist in determining the market demand for such products, while the WPA 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 LHM and a WPA. The LHM would assist in determining the market demand for such products, while the WPA 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	
JP092a	Housing	James Reid	Miller Homes	Steven Longstaff, ELG Planning, Gateway House, 55 Concorde Road, Darlington, DL3 7EH 0775939092	Policy	HS - Affordable Housing (strategic)	N/A	Object	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	
JP094f	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Concorde Road, Darlington, DL3 7EH 01325 489342	Policy	Policy H 5 Affordable Housing	Object	Object	It is not possible to comment in detail on the proposed affordable housing requirements as the Council's WPA is not available at this stage. As a result, Mandale Homes reserve their position on the above matter until the WPA 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, without prejudicially 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 noted that section 6.5.3 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 5 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 not possible to comment in detail on the proposed affordable housing requirements as the Council's Whole Plan Viability Assessment 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	
JP102a	Housing	Kevin Ayrton	Story Homes Ltd	ELG Planning, 55 Concorde Road, Darlington, DL3 7EH	Policy	HS - Affordable Housing (Strategic Policy)	N/A	Object	It is noted that section 6.5.3 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 5 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	
JP104n	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparrowflair Planner & Architects, Junction 41 Business Court East Ardley, Leam, WPT 248 01924873873 07841 621229	Policy	Policy HS - Affordable Housing (Strategic Policy)	Object	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 HS 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 LHM. 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 HS 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 HS 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. 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 HS 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 LHM. 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 HS 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 HS 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	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	See response to comment 104n above.
JP105n	Housing	Andrew Rose	Taylor Wimpey	Andrew Rose, Sparrowflair Planner & Architects, Junction 41 Business Court East Ardley, Leam, WPT 248 01924873873 07841 621231	Policy	HS - Affordable Housing (Strategic Policy)	Object	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 HS 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 LHM. 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 HS 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 HS 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 104n above.	Yes	See response to comment 104n above.

LPR107d	Housing	James Litherland	CityHeart	Jeremy Good, EUG Planning, 03 704 701235/405236, jeremy@eugplanning.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 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	Sterningham Estates Limited	Chris Smith, Lichfields, The St Nicholas Building, St Nicholas upon Tyne NE1 1PW 0191 2615685	Policy		HS - Affordable Housing (strategic)	N/A	Policy HS of the new 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 area 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 Hummerscott, Hurworth, Moelden 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 Sterningham 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. 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 HS 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 /	Barratt David Wilson Homes	Savills UK Ltd, The Lunan, St James Boulevard, Newcastle Halls, Newcastle upon Tyne, NE4 5AG	Policy		HS - Affordable Housing (strategic)	Object	Draft Policy H1 remains largely unaltered in the context that there is a proposed 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 Brimston and Fawceter Ward which has an affordable housing requirement of 20%. Policy H1 in the adopted Local Plan outlines a 50:50 split in respect of affordable housing tenures, between affordable rent and affordable home ownership, when those wards subject to a 20% affordable housing requirement. We note the proposed revisions made to the affordable housing tenure splits within Draft Policy H1 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 H1. This includes the absence of the 2025 LHNIA and a Whole Plan Viability Assessment. It is understood that the LHNIA 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 LHNIA 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 compiling policies, to be prepared positively, and shaped by effective engagement with stakeholders. Likewise, NPPF paragraph 38 notes that plans, and again by association their compiling 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 to affordable housing tenure requirements. Viability PPG provides the following requirements for viability related considerations at plan-making stage:	Alterations to tenure split in policy HS noted. However, the Local Plan Review has not been published with any supporting evidence to justify the proposed amendments to Draft Policy H1. This includes the absence of the 2025 LHNIA 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 is questioned. The evidence should be published at the earliest opportunity. Reserve the right to comment further but object to draft policy HS 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	Belway Homes	Rachel Coates, Stancic,	Policy		HS - Affordable Housing (strategic)	Object	Belway supports the principle of delivering affordable housing in line with the identified local housing need. It has a strong track record of doing so across the country. Belway 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 LHNIA 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 HS. Highly prescriptive tenure splits are introduced but stakeholders are unable to meaningfully assess or test these requirements without access to the LHNIA 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, Belway expect DBC to provide the necessary evidence at the next available stage once the LHNIA 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, Belway 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, Belway 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.	Belway 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 LHNIA 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 LHNIA will be published at the next stage along with a Viability Assessment. Belway 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 to England - Diocese	Emma Williams, Debitelle,	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 reconsider 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	Trust Way Investments Ltd	Jack Conroy, Smith, The Lunan, St James Boulevard, Newcastle Halls, Newcastle upon Tyne, NE4 5AG	Policy		HS - Affordable Housing (strategic)	Object	Draft Policy HS provides a revised affordable tenure split for those 'locations' with both a 20% and 30% affordable housing requirement. However, our Client's Site falls within the Salsburgh 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 LHNIA 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 HS cannot be said to be justified at this time, on this basis. Our Client reserves the right to comment further on Draft Policy HS at a later stage in the LPR process, subject to evidence within the LHNIA being made publicly available.	Alterations to the tenure split in policy HS noted. The LHNIA 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 HS 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 LHNIA 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 Beathan	NHS Property Services		Policy		HS - Affordable Housing (Strategic)	Neutral	NHS/PS 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 or near 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

JPR119	Housing	Natasha Styles	MCCARTHY & STONE & CHURCHILL LIVING	The Planning Bureau, 4th Floor, 100 Holburn 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 tenure split for the provision of 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 believe 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 302 Reference ID: 10-003-20190509). The evidence underpinning the council's policy requirements should therefore be robust and be used to inform 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 310 Reference ID: 63-010-20180626) it generally has additional facilities such as extensive communal areas, such as a cafe or social, 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 makes 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 304 (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 persons' housing and 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 need 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
JPR120d	Housing	Councillor Bryony	H4 Salvation Road, Durrington, SO1 8W		Policy		H5 - Affordable Housing (Strategic)	Neutral	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. It is welcome that the required proportion of affordable housing in the higher cost ward 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 new housing built with social and affordable housing of a variety of different sizes and types well mixed amongst private housing. Cash provided to live for off-site development is not social housing, should not be allowed, except in exceptional circumstances - this must include the council's own joint venture schemes. It seems perverse that 100% of affordable homes offered in lower-cost wards must be for affordable ownership, when it's less likely that people can afford to buy. Wards with higher IMD scores have among the highest proportion of private rental tenure. To rebalance the tenure 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 are already committed to build. 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 lower income 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. 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. In Policy H5, a.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 housing.	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 their provision of affordable housing to ensure an appropriate mix of homes and affordable provision in exceptional circumstances. 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. 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 terms of type and tenure. Off-site affordable housing should be an appropriate mix of homes and affordable provision in exceptional circumstances. There are some exceptions which are subject to certain criteria and justification. The tenure required for affordable housing is a value factor in what is viable. Profit rights 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 20% 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 21 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
JPR01a	Housing	NW 2 N & NW 1/2 Swinbank	Andrew Moss, Wand Headway LLP, Sandgate House, 102 Quayline, Newcastle upon Tyne, NE1 3DX Tel: 07998978420 andrew.moss@wandbaso.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 interrelationships between this policy, H3 and H5 needs to be worked through. Additionally it is suggested that rural exception sites be 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 S03 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
JPR10b	Housing	Duncan Peake	Raby Estates	Hanna Mawson, Pigpos Group, First Floor, Gainsborough House, 34-40 Grey Street, Newcastle upon Tyne, NE1 6AE			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 should be developed in rural areas and not in the countryside". This is a restrictive policy that will prevent the development of housing in rural areas and not in the countryside. 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 Plercebridge 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.	Concerns raised in respect of policy S02 (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 Plercebridge 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 S02, 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
JPR02a	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
JPR051k	Housing	Chris Martin	HBF		Policy		H7 - Residential Development in the Countryside	Object	Policy H7 is related to Policy S03 in that Policy S03 seeks to facilitate development within development limits, whilst Policy H7 seeks to manage development outside of development limits (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 S03 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 S03 given they are related. Comments made in relation to Policy S03 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 S03 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
JPR009 & 60h	Housing	Dominic Crowley	UXfields		Policy		H7 - Residential Development in Countryside (strategic)	Object	Italian Land has provided comments on Policy S03 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 Italian Land's site to the west of Roundhill Road in Hurworth (SHAALAA 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 S03 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 Italian Land's site to the west of Roundhill Road in Hurworth (SHAALAA 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 S03 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
JPR067 & 68i	Housing	Georgina Cox	Gladman		Policy		H7 - Residential Development in Countryside (strategic)	Neutral	See submitted attachment. Policy H7 and policy S03 are interrelated in restricting development outside of settlement limits and within open countryside. Gladman would consider Policy H7 should be combined to avoid confusion. Alternatively, Gladman's comment for policy S03 apply also for H7.	Policy H7 and policy S03 are interrelated in restricting development outside of settlement limits and within open countryside. Gladman would consider these Policies should be combined to avoid confusion. Alternatively, Gladman's comment for policy S03 apply also for H7.	The approach in policy S03 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
JPR10c	Housing	Duncan Peake	Raby Estates	Hanna Mawson, Pigpos 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 S02 (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 Plercebridge 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 S02, 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

LP026g	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 Fairwater 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 Whessee Farm Landfill Site and is located at Burtree Lane, Darlington. The licence (Licence Reference number EAWM1 67037 (DUR 0344) 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 tributaries 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 Whessee Farm.	Burtree is a large allocation requiring an agreed masterplan. As part of this process development is focused away from areas of high flood risk such as West Beck. Comments regarding Little Whessee Farm Landfill Site are noted.	No	None
LP123	Housing	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, 51 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0395 3333146	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/POL/1), further changes are required.	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 allocations from the Reg. 18 Plan will be recombined.	Yes	Adjust Policy H11 and E2 to a figure of approximately 19.4 hectares. Adjust wording for Criterion G.
LP125&126f	Housing	Josh White	Natural England		Policy		H11 - Burtree Garden Village (Site Allocation)		Support	We welcome Policies H12 and H11, which include robust green infrastructure requirements; however, these could be strengthened by explicitly requiring masterplans to demonstrate alignment with LMS priority areas and wider ecological networks beyond site boundaries.	HE/HLL suggest the amount of allocated 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.	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.	Yes	
LP123a	Housing	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, 51 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0395 3333146	Policy		H11 - Burtree Garden Village (Site Allocation)	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/POL/1). 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 LP123.	No	None
LP123b	Housing	Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, 51 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0395 3333146	Policy		H11 - Burtree Garden Village (Site Allocation (strategic))	H11 - Burtree Garden Village (Site Allocation (strategic))	Support	HL/HLE 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 Lane. 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 HL/HLE control on the longer term delivery of a bi-centennial, railway focused active travel route. Until that route is in situ, with timetables 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 HL/HLE 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 2036 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 (LP123).	See detailed response to LP123.	See detailed response to LP123.	See detailed response to LP123.
LP123c		Martin Bonner	Hellens Land and Homes England	Martin Bonner, Savills, The Lumen, 51 James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5BZ 0395 3333146	Policy		H11 - Burtree Garden Village (Site Allocation (strategic))	H11 - Burtree Garden Village (Site Allocation (strategic))	Support	HL/HLE 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 Lane. 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 HL/HLE control on the longer term delivery of a bi-centennial, railway focused active travel route. Until that route is in situ, with timetables 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 HL/HLE 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 2036 than they were in 2018. This revision would comprise:	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 an agreed position is confirmed.	No	None
LP127, 128 & 129f	Housing	Ros Kane	Historic England		Site	Site 185 Burtree Garden Village			Neutral	See App 8 submission. This is an existing strategic allocation, formerly known as Greater Fairwater. The site has been renamed Burtree 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 106 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 2015, as referenced in the policy text, and in 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 106). 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 S&DR walking and cycling route. (i. viii) 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 separation 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.
LP029b	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 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 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 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	

UPK reference (starting at UPK01)	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
UPK16a	Housing	Jack Conroy	Tiviot Way Investments Ltd	Jack Conroy, Savills, The James St James Boulevard, Newcastle, Newcastle upon Tyne, NE4 5BT	Policy	2	H10 - Skerringham - site allocation (strategic)		Support	See submitted document entitled Darlington Local Plan Review Regulation 18 Consultation Land at Bishopston Lane, Great Burdon.	A detailed comment has been submitted by Savills on behalf of Tiviot Way Investments one of the three principle site promoters within the Skerringham allocation. They have noted the following points: •The supporting text at Paragraph 5.13.3 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 Tiviot Way's land holding as employment would in effect leave only 45% of the wider site area to be accommodated the 4,500 homes to be delivered under Policies H2 and H10. •The 36 of the WPP required local Plan to be effective a deliverable over the 15 year period. They suggest that should the delivery of Housing be prejudiced by the new employment allocation then Policy H10 would not be effective and thus would likely not be found sound at examination. •Suggest that re-allocating Tiviot Way's land holding would effectively sterilise 63 hectares of residential land and that any shortfall in housing supply at Skerringham would severely impact the Council's housing land supply. •Highlight that Tiviot 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, Tiviot Way state that their residential development would be able to fully fund their section of the Distributor Road. •Tiviot 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, Tiviot Way request that the new employment allocation be removed and the land in question be returned to a housing allocation.	Tiviot Way Investments became involved in Skerringham Garden Village following the adoption of the current plan and late in the development of the Skerringham Garden Village Comprehensive Masterplan and Design Code, the requirements for which were detailed in Policy H10. The Council has held discussion with Tiviot Way to develop a new mixed use application for their land at Skerringham. The Council is keen to see employment land within the Skerringham 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 Skerringham 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 employment area within the Tiviot Way site to be shown on the Masterplan Framework. The triggers within H10 Criterion (g)(ii) - (iv) are based on highways modelling conducted for the adopted plan. The Council is willing to consider updating their 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 ground.	Yes	Re-integrate the employment and housing allocations at Skerringham into a mixed use allocation and update the Masterplan Frameworks.
UPK77a	Housing	Sarah Harris	Resident		Policy	10	H10 - Skerringham - Site Allocation (strategic)		Object	Clarify whether the Local Plan—particularly the Skerringham 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 Skerringham 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 Skerringham Allocation Require a reassessment of the overall viability of the Skerringham site. The DNLR Options Assessment Report (April 2026) indicates a substantial increase in estimated costs—from approximately £140 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 Reintroduce 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 Skerringham allocation.	In addition, Tiviot Way have provided specific feedback on the retained triggers for the Questions whether the delivery of the Local Plan - particularly the Skerringham allocation - is dependent on the proposed Darlington Northern Link Road (DNLR). Notes the route of the DNLR will impact the Skerringham 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 Skerringham allocation is required following the last 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 TYCA, Skerringham 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 Skerringham 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 unlikely the golf course could now re-locate to the suggested area, which forms part of a package of biodiversity net gain and nutrient neutrality measures being brought forward as part of application 24/00772/FULLE. The course has been retained within the allocation boundary to cover the possibility of this land becoming available in the future.	Yes	References to the golf club remaining in situ should be clarified to (for example) where the golf club site is 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 Skerringham Community Woods.
UPK08	Housing	David Clark	subm Resident		Policy	10	H10, Skerringham		No answer	In short, the current adopted Darlington Local Plan (2016-2036) is structured so that the initial and substantial delivery of Skerringham 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 Skerringham 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 Skerringham Garden Village is not reliant on the DNLR. The comment also suggest that the following wording from H10 g), 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) ii), states that "Development of the initial phases of development on the eastern part of the allocation will be accessed via Barnington Lane and/or Barnorton 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 Barnorton Lane and Bishopston 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 TYCA's Options Appraisal Report for the DNLR.	While options continue to be considered for the DNLR by the TYCA, Skerringham 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 Skerringham 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 Bishopston Lane and Barnington 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/FULLE 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 occupations beyond 449 dwellings by planning condition until the first section of the distributor road is completed. The Darlington Northern Link Road and the Skerringham 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 Skerringham Estates and is satisfied they are robust and that the scheme remains viable as a whole.	No	None
UPK02h	Housing	Louise Tat	Environment Agency		Site / Policy	10	H10 - Skerringham Garden Village	Housing	Neutral	Site ref. 251, Skerringham and Policy 10 Skerringham 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 Ely 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 Junction 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 Barnington Quarry Landfill Site. The environmental permit was originally issued by Durham County Council as Waste Disposal Licence DWR 140. 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/P3493N5). The site no longer accepts waste. The closed landfill site is restored and in affluence. The environmental permit remains in force.	The Environment Agency (EA) note that the River Skerne has two significant floodplain areas within the boundary of the Skerringham Allocation. These are where the Skerne is joined by a culverted watercourse by the East Coast 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. Separately the EA notes the Skerringham allocation is within 250metres of Barnston (previously Barnington) 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 DWR 140. 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/P3493N5).	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 issue, along with the landfill site noted in the comment.	No	None
UPK03g	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 Barnington landfill site requires clear safety standards, minimum distances, and investigative work. Especially bearing in mind the hissing of gases 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 "roads", 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 relevant, the marker must be reinstated and placed away from BNG/NV land. If Darlington Golf Club did decide to relocate, surely, Dunsdale 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 Skerringham allocations. Notes that Barnington 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 Skerringham Design Code SPD being related to show rods. The comment also requests that Darlington Golf Club be removed from the boundary of the Skerringham 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 Frameworks 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 arboreal. 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 Skerringham or Burtee allocations which have their own design codes and was intended to raise design standards outside these areas. Skerringham is a large allocation, with 150H 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 unlikely the golf course could now re-locate to the previously suggested area, which forms part of a package of biodiversity net gain and nutrient neutrality measures being brought forward as part of application 24/00772/FULLE. The course has been retained within the allocation boundary to cover the possibility of this land becoming available for development in the future - (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) where the golf club site is 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 Skerringham Community Woods.

FP055 & 56	Environment	Kathy Barley	Skeerningham Woodland Action Group	Site	10		Object	The Local Plan must not be amended until the route of the Darlington Northern Link Road (DNLR) is legally settled – as Skeerningham Garden Village must be deleted from the draft. This is because, if the chosen route is one of those south of the woodland, Skeerningham 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 Skeerningham Woods officially remain. The Skeerningham Garden Village (SGV) masterplan, its design code and, indeed, the original bid for garden village status all depend on the bypass going along both 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, Skeerningham 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 "pre-determination". This is very likely to result in a judicial inquiry. Further evidence of probable pre-determination 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. Skeerningham Estates Ltd's June 2024 Viability Assessment showed the road plan bridge costing around £44m whereas the April 2025 OAR report estimates £140m. This is another clear indicator of a pre-determination 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 A23 and A680. 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 Skeerningham Design Code, Masterplan, and the original bid for Garden Village status all depend on the DNLR providing the site. The respondent considers that Skeerningham 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 Skeerningham and are a case of pre-determination. It is also suggested that the cost of the road through Skeerningham has increased significantly in recent years and that the viability of the site must be reassessed. The respondent states that the Skeerningham Woodland Action Group would prefer the proposed distributor road to any routing of the DNLR through Skeerningham. Additionally, the comment suggests that the local plan as a whole distorts Darlington's future housing needs and that an ageing 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 Skeerningham 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 TYVA. Skeerningham 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 Skeerningham 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 terminology within the Transport Chapter relate to the local distributor road's role as one of several links made 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.
FP055 & 56a	Housing	Kathy Barley	Skeerningham Woodland Action Group	Site	10		Object	Objections to the draft Local Plan by Skeerningham Woodland Action Group There is a valid question to be asked over the Local Plan describing the SGV as a 'garden community' due to what they view as the plan's contradictions. 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 annotations 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 fair-price homes and not cropped as 'unviable' in favour of payment in fee 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.	Skeerningham Woodland Action Group suggests that Skeerningham should not be described as a 'garden village' or 'garden community' due to what they view as the violations with the proposals. They highlight the importance of ensuring new services and facilities are delivered within Skeerningham as early as possible. SWAG asks that the Local Plan enforce investigation of emissions from the former landfill site near Barmpton, within the Skeerningham 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 Skeerningham 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.	Skeerningham 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 context 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 amber, 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 Skeerningham or Barmton allocations which have their own design codes and was instead intended to raise design standards outside these areas. Policy H10 works in conjunction with the agreed Masterplan for Skeerningham 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 terms with its own bullet point separate 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 housing constraints.
FP056b	Housing	Cain Griffiths	Satnam Planning Services for Trivolt Way	Policy	10	H10, Skeerningham	Unknown	A radical change to Policy DC1, paragraph under (i), p.40 now says "reds" – meaning failures – ARE allowed in the Skeerningham strategic allocation and following that, to prepare a model part 1 S106 Agreement. It has become apparent to 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. It. There is no evidence presented by the council to justify a 1,500 dwelling delivery trigger regarding the final local distributor road link through TWML land. It. Consequently as part of the plan review, the council should undertake a viability testing assessment of the required infrastructure for Skeerningham Village, in line with the Viability PPS, 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 Skeerningham allocation. This will ensure the policy triggers are positively prepared, justified and robust. It is established in these Skeerningham 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-top 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 occupancies. It. 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 pages 3.11 – 3.16 the Trivolt's TWML consider to be Should the DNLR remain in the Local Plan then this could impact on both the Skeerningham Masterplan and Design Code. These will therefore need to be re-written before any planning applications are approved. This needs to be included in Policy H10. 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 Bishopsgate 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. During the previous Local Plan hearing the viability of Skeerningham was called into question by the Planning Inspector. Costs have significantly risen since then and an urgent re-assessment of the viability of Skeerningham 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 27th lot [sic] of employment and allocated within Policy H10. The Local Plan should be well evidenced so that the need for the land as employment land is very clear.	Satnam Planning Services represent Trivolt Way investments, one of the three principle site promoters within the Skeerningham. 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 A1155. 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 order 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 appropriate evidence that doing so would not severely impact the highway network.	No	None
FP069a	Housing	Jude Murray	Resident	Policy	10	H10 – Skeerningham – Site Allocation (strategic)	Object	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 Bishopsgate 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. During the previous Local Plan hearing the viability of Skeerningham was called into question by the Planning Inspector. Costs have significantly risen since then and an urgent re-assessment of the viability of Skeerningham 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 27th lot [sic] of employment and allocated within Policy H10. The Local Plan should be well evidenced so that the need for the 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. Also that all previous reference to the Skeerningham Distributor Road that have been changed to 'link road' should be amended. Mentions a misalignment between Policy H10 and the agreed Masterplan regarding the delivery of the first section of the Skeerningham Distributor Road. Requests that the viability work related to Skeerningham Garden Village be re-assessed to adjust for increased cost pressures. Asks that the Local Plan enforce investigation of emissions from the former landfill site near Barmpton, within the Skeerningham allocation. Comments that the Local Plan will need robust evidence for the designation of employment land as part of the Skeerningham allocations.	While options continue to be considered for the DNLR by the TYVA, Skeerningham 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 Skeerningham 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 Trivolt Way to develop a new mixed use application for their land at Skeerningham. The Council is keen to see employment land within the Skeerningham Allocation to fulfil the principles of the garden communities programme and Trivolt Way's site, with quick access to the A66, is the strategically the most sensible area within Skeerningham 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 the proposed employment area within the Trivolt Way site to be shown on the Masterplan Framework. The current Local Plan provides a range of between the occupation of the 200th and 450th dwelling before the local distributor road between Bishopsgate 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 24/0072/FULLE 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 occupancies by planning condition until the first section of the distributor road is completed.	Yes	Re-integrate the employment and housing allocations at Skeerningham into a mixed use allocation and update the Masterplan Frameworks.
FP072	Housing	Trustees of Thoron	Trustees of Thoron and Croft	Policy	10	H10 – Skeerningham – Site Allocation (strategic)	Support	We support the general principle of Skeerningham Garden Village. We are representing landowners who own land 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 preclude 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 respondent represents landowners who own land between Hutton Plantation, and the River Skerne, to the west of Skeerningham. The Council is keen to see employment land within the Skeerningham Allocation. The area is currently shown as 'Indicative Strategic Green Infrastructure' within the Skeerningham 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 Skeerningham Framework. It is unlikely to be considered suitable for residential development as it would be north of the ridge line within the valley of the River Skerne. The Council has established design principles for Skeerningham through the Design Code H10, which focuses all development south of the proposed distributor road out of the valley of the Skerne, to leave this area available for leisure/recreation/leisure uses.	No	None

JP081	Housing	J Murray	Secretary - Whitfield Residents Association inc Friends of Beech Wood	Policy	10	H10 – Skeringham – Site Allocation (strategic)	Neutral	As per the above, should the references to the DNLB 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 DNLB. 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)(i) 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 Skeringham Garden Village was not updated to reflect the fact that the road will be delivered 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 Skeringham 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 Starme within site S05. 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 DNLB to route through the Skeringham 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 Skeringham Masterplan contradicts the Local Plan, as the Local Plan states that 'the local distributor road between Bishopston Lane and Bampton 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 Skeringham 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 Skeringham 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 received in this area from Tiviot Way Investments. The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skeringham. The Council is keen to see employment land within the Skeringham Allocation to fulfil the principles of the garden communities programme and Tiviot Way's site, with quick access to the A66, is the strategically most suitable area within Skeringham 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 Development of the Darlington Northern Link Road is being led by the TYCA. The wording in Para. 92.5.9 has been changed as the route of the DNLB has yet to be decided. Other changes of terminology 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 'link star' has been removed as it is unlikely the golf course could now re-locate to the previously suggested area, which forms part of a package of biodiversity net gain and equivalent neutrality measures being brought forward as part of application 24/00772/FULF. 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 anticipated that the site developers will make any further offers to allow the Golf Club to relocate 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, while minimising the number of arbors. Schemes with one or more roads will not be acceptable and will be refused planning permission unless sufficient 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. Re-integrate the employment and housing allocations at Skeringham into a mixed use allocation and update the Masterplan Frameworks.
JP082	Housing	David Clark	Resident	Policy	10	H10 – Skeringham – Site Allocation (strategic)	Object	DNLB wording amended in revised local plan - see attachment The above are intrinsically linked. If the DNLB goes through Skeringham then the whole Garden Village concept goes! Instead the development becomes a poorly regulated urban sprawl. The proposed approach to the DNLB remains unsound. Routing a bypass through new housing is incompatible with resident health and wellbeing and contradicts the Skeringham Garden Village (GV) Design Code. The Plan must retain the statement that Skeringham GV cannot proceed until the DNLB 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 DNLB must remain protected for 30 year market neutrality (NN) and Biodiversity Net Gain (BNG) commitments. Object to the wording change from "local distributor road" to "link road", as Policy H10 continues to rely on the former. The DNLB approach also fails to consider the cheaper, lower impact A167/B89 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 and near Great Burdon. The Bampton landfill site requires clear safety standards, minimum distances, and investigative work. We strongly object to the Design Code downgrade allowing "red", which undermines design quality. Darlington Golf Club has confirmed it will not relocate, so land should therefore be removed from the housing allocation. If relocation remains referenced, the marker must be reinstated and placed away from BNE/NN land. Dinsdale Golf Course, now closed, represents the most suitable relocation option.	The respondent objects to the wording changes in the Transport Section regarding the DNLB. 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 pre-determining the upcoming public consultation on the DNLB. Additionally objects to the removal of the 'link 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 requirements in the Council's Design Code for Skeringham.	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 Skeringham Community Woods.
JP084c	Housing	Tony Gillam	Resident	Policy	10	H10 – Skeringham – Site Allocation (strategic)	Object	Skeringham GV and Darlington Northern Link Road (DNLB) The above are intrinsically linked. If the DNLB goes through Skeringham then the whole Garden Village concept goes! Instead the development becomes a poorly regulated urban sprawl. The proposed approach to the DNLB remains unsound. Routing a bypass through new housing is incompatible with resident health and wellbeing and contradicts the Skeringham Garden Village (GV) Design Code. The Plan must retain the statement that Skeringham GV cannot proceed until the DNLB 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 DNLB must remain protected for 30 year market neutrality (NN) and Biodiversity Net Gain (BNG) commitments. Object to the wording change from "local distributor road" to "link road", as Policy H10 continues to rely on the former. The DNLB approach also fails to consider the cheaper, lower impact A167/B89 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 and near Great Burdon. The Bampton landfill site requires clear safety standards, minimum distances, and investigative work. We strongly object to the Design Code downgrade allowing "red", which undermines design quality. Darlington Golf Club has confirmed it will not relocate, so land should therefore be removed from the housing allocation. If relocation remains referenced, the marker must be reinstated and placed away from BNE/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 Skeringham allocation are intrinsically linked, and that routing the DNLB through Skeringham would damage the garden village concept. The respondent suggest the Local Plan should not proceed until the DNLB 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 original safeguarded route for the DNLB should remain in the plan until the route is fixed. The comment also notes that part of the Skeringham Allocation was previously defined as 'high value'. The comment also requests that Darlington Golf Club be removed from the boundary of the Skeringham 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.	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 Skeringham Community Woods.
JP086a	Housing	Roger Fitzpatrick	Resident	Policy	10	H10 – Skeringham – Site Allocation (strategic)	Object	Should the DNLB remain in the Local Plan then this could impact on both the Skeringham 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 1 and 2 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 DNLB 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 DNLB. There is a mismatch between H10(g)(ii) and the Masterplan. Para. 91(i)(ii) states that the delivery of the section of the road between Bampton Lane and Bishopston 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. Since the last Local Plan costs have increased significantly and therefore an urgent re-assessment of the viability of the Skeringham 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 Tynes Valley Combined Authority could impact both the both the Skeringham Masterplan and the Design Code. Inconsistent wording is noted between Policy H10 and policies with the Transport Section regarding the Local Distributor Road and the Darlington Northern Relief Road. At this time though, the TYCA is consulting on route options and no final route has been decided. As such, the Council's intention is that development at Skeringham should proceed on the basis the DNLB will not pass through the allocation, until further information is known. Changes of terminology 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 Skeringham Estates and is satisfied they are robust and that Skeringham remains viable as a whole. The Council has held discussions with Tiviot Way to develop a new mixed use application for their land at Skeringham. 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 Skeringham Community Woods. Re-integrate the employment and housing allocations at Skeringham into a mixed use allocation and update the Masterplan Frameworks.
JP080c	Housing	Colin Griffiths	Satsam Group	Policy	10	Policy H 10 Skeringham – Site Allocation (Strategic Policy)	I. H10 Triggers. II. The Skeringham Board members are meeting regularly to discuss and refine the infrastructure requirements for the Skeringham strategic allocation and following that, to prepare a model part 1 S106 Agreement. III. 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. IV. There is no evidence presented by the council to justify a 1,500 dwelling delivery trigger regarding the final local distributor road link through TWL land. V. Consequently as part of the plan review, the council should undertake a viability testing assessment of the required infrastructure for Skeringham Village, in line with the Viability PPS, 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 Skeringham allocation. This will ensure the policy triggers are positively prepared, justified and robust. VI. It is established in these Skeringham 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 occupancies.	This comment is from C. Griffiths (Satsam Group) who represents Tiviot Way Investments, one of the three principal site promoters within the Skeringham 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.	Yes	Consider adjusting trigger points when further highway modelling is received.	

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	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 TfL's TfV2 investments for Sutton 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 landfall: greater clarity is required as to how the boundary treatment of the old landfill site west of Barrington 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 roads 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 A Darlington Golf Club has decided not to relocate, and is currently seeking a new access road through Elm Tree Farm site. F As that's now a long held decision, the golf club land should be removed from the area allocated for housing. However, there is still mention of "if the golf club relocates", yet the pink star map used 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. G It 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. H It's reported that Oriskany Golf Course has closed, and it would be in Theokistos' 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 received 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. Suggests the proposed employment allocation will need to be well evidenced. Notes that Barrington 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 assuring 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 indicative marker for a relocation is not 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. Barrington 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 Buttree 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-integrating the employment and housing allocations at Skerningham into a mixed use allocation and update the Masterplan Framework. 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) the golf club site to be brought forward for development... This would clarify that there is no option for the golf club to relocate to the previously proposed site near Skerningham Community Woods.	
LPRI26	Housing	Councillor Bryony Holroyd	Site	10		Object	A It is unrealistic 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 - making 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 (its limit speed to max 40mph), with priority crossings for pedestrians, cyclists and horse riders to green space beyond. B It is wording stating that the delivery of Skerningham GV is agnostic of whether or not the DNR is delivered has been removed - this must stay in the Local Plan. As the DNR impacts the Design Code and Masterplan, its fate 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 DNR 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 DNRs (2 or 3) routes £46m - 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) 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 DNR has not yet been decided and this would pre-determine it). G Policy H10, point (i) 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 completed."	Respondent comments that it is unrealistic to put a bypass (Darlington Northern Link Road) through a housing development. Combining the DNR 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 DNR and suggest the Local Plan Review cannot be finalised until the route of the DNR is determined. Suggests protection for the original route of the DNR are being removed as part of the review. The comment also questions the viability of Skerningham based on the recent TVCA Options Appraisal for DNRs. Notes changes to wording regarding the Local Distributor Road in the Transport Chapter. Also notes a potential discrepancy between the Policy H10, point (i) 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 street use of the already existing route for HGV traffic from Teesside heading north, via the A167, then across the A66 to the A167M at Sedgfield.	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 DNR and there is no confirmed route at this stage. The impact of the DNR 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 these circumstances. However, given the unknowns with the route, delivery, and specification of the DNR, 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 changed 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 HGV traffic on the distributor road provided by Skerningham Estates and is satisfied the coatings 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 Bishopston Lane and Barrington Lane needs to be completed. The site developers have chosen to deliver the road at the end of that range, and their current application 24/0072/FULF 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 section of the distributor road required by planning condition until the first section of the distributor road is completed.	No	None	
LPRI25&126a	Housing	Josh White	Natural England	Policy	10	H10 - Skerningham - Site Allocation	A 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 LMS priority areas and wider ecological networks beyond site boundaries.	Comment support explicitly requiring the masterplans for the Skerningham and Buttree allocations to demonstrate alignment with LMS 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 Buttree allocations to demonstrate alignment with LMS Priority Areas and with wider ecological networks beyond site boundaries. For H10 it is recommended this is integrated into Point 1.	
LPRI27, 128 & 129a	Housing	Ros Kain	Historic England	Site	10		Neutral	A See App A submission. A strategic allocation, proposed to cover two allocations, and is renamed Skerningham Garden Village. The policy reference (H10) is unchanged. 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 examines employment use within the site boundary. Shown as an area to the east of the River Skerne (Site S05 on the Policy Map). Policy E2 has been amended to reflect this. Site S05 would provide approximately 27ha of employment use. B 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. C The HIA dates to 2019, as referenced in the policy text. D 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. Safe, passing, layout, infrastructure and traffic generation for example. Suggested change - Clarify if the SPD covers the employment use (site S05). E We support the revisions to the policy to include the Design Code. F 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 G The Historic Environment and Site Allocations in Local Plans H 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 EMV1. 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.
LPRI21a	Housing	Mr Martin Swainston	Site	10		H10 - Skerningham - Site Allocation (strategic)	Object	A 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
LPRI30	Housing	Richard Branton	Site	10			Object	A 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 in our own, seems odd 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 any 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. B 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, Harrogate 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 consider it on its own merits.	No	None
LPRI35a	Housing	Sophie Colata	Site	10			Object	A The scale of development proposed at this site is significant and will clearly have a major impact on the surrounding area, whilst I understand the need for green growth, it is not clear how the supporting infrastructure - particularly transport, education and healthcare - will be delivered in practice alongside the pace of development. B 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. C 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 queries how the supporting infrastructure for Skerningham Garden Village will be delivered. Highlights concerns that the elements described 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 Masterplans, 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	

UPR044	Housing	Vanessa		Site	10			Object	Skerriingham 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 Twist Way Investments have put in planning application for housing. Greater guidance must be provided on how Barrington ex-Landfill will be managed safely - minimum distances of homes, monitoring & invasive investigations required. Policy DC1, paragraph under (b), p.420 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 NH (which must be retained for 30yrs) as these are not compatible with golf course use. Drinadale 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 Skerriingham 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 Barrington 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 Skerriingham Allocation on the grounds that it is not relocating. If the club is relocating, requests the indicative marker for a relocation is re-added to the Masterplan Framework associated with Policy H16.	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 discussion with Twist Way to develop a new mixed use application for their land at Skerriingham. The Council is keen to see employment land within the Skerriingham Allocation to fulfil the principles of the garden communities programme and Twist Way's site, with quick access to the A66, is the strategically the most sensible area within Skerriingham 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 Twist Way site to be shown on the Masterplan Framework. Barrington 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 arbors. 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 Skerriingham or Burreore 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 Skerriingham Community Woods.
UPR106a	Housing	Andrew Keir	Councillor/Resident	Site	6		Neutral	Finally I request the introduction of a weight restriction on the traffic along Barrington 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 are key to delivering a balanced and sustainable plan for Darlington.	Requests a weight restriction be introduced on Barrington Lane.	Not an issue to be considered as part of the Local Plan.	No	None	
UPR110d	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 Skerriingham site. Whilst being part of the Skerriingham 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 Skerriingham strategic allocation and have fed into the Skerriingham 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 Skerriingham 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 'head' 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 Skerriingham proposals. Furthermore, the highway infrastructure proposed will secure the early delivery of a key part of road infrastructure required to serve the wider Skerriingham 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 Skerriingham Masterplan Framework plan which would ensure that any highway 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 Skerriingham 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 Skerriingham Garden Village Allocation. The comment sets out the actions undertaken by Banks Group as part of their current planning application to enable the delivery of the western end of the Barrington Local Distributor Road. The argument for separating the allocation is based on the severance 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 integrated into the overall scheme for Skerriingham Garden Village and is covered by both an agreed Masterplan and a Design Code as part of the single allocation. While the severance caused by the ECLM 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 encourage the delivery of one comprehensive, integrated development, with a development partners working together to achieve a common purpose. Issues related to integration 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 /Si	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 Skertingham 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 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 assesemt 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 5,400 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 conclusion that job growth has peaked through Amazon and DEC in the last 7 years	N		None
LPR064 & 065i	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 achievable 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 permitted development.	Currently not supported within the NPFF 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 size, 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 allocation 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 additional 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 suggested 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	Triot 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 Bishopston 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 H10. 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 residential 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 development rights from other policies such as Town Centre or E1	N	None
LPR122	Employment for Economic Growth	ELG Planning for La	Gateway House, 55 Consiccliffe 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 updated 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 employment 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 & 129a	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 & 129a	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 will be 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	H/L/HE note the inclusion of a further 37.57 hectares of B2/B8/Elg employment space at Burtree Employment Park to the north west of the H11 allocation on the western boundary of the A1(M). Whilst H/L/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
LPR123j		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 accommodate those / Those industries 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 employment site need to outline Modal Shift proposals 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-use site inc. residential.	Other brownfield sites mentioned are not allocated in the Local Plan	Those sites are outside TC 6 boundary	No	None

LPR reference (starting	Topic	Name	Organisation	Agent name and address	Site / Policy / Site	Policy Details	Section Details	Object / Site	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 Miscellaneous	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	Recommend	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	Recommend	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 Assessment 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	Assessment 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 preparation 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 preparation 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, DFP Planning, Studio 14, Haylofts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dppuktd.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 unverified 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 Skertingham 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 ENV2 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 promoting 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 & 129i	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'

LPRI27, 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 could be considered.	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".
LPRI27, 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	Helens Land and Homes England	Martin Bonner, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5B2 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.		
LPRI32a	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
LPRI34j	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Policy	ENV3 - Local Landscape Character	Part B2	Recommend	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
LPRI34k	Environment	Ross Chisholm	Friends of the Stockton& Darlington Railway		Chapter	ENV3 - Local Landscape Character	Local Landscape Character - Paragraph 9.3.5	Recommend	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.
LPRI52o	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 emphasised 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 ii and B2 ii.	Include reference to watercourses.	Comment noted and amendment proposed.	Yes	Add "watercourses" to A2ii and B2ii. Part D add in after 'traditional natural and built features' "including ancient and semi-natural woodland, trees, hedgerows and watercourses".
LPRI87d	Environment	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne NE4 5B2	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 biodiversity should be considered 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 Barnpton 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 reconsider 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 amended). ENV 3 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	Concerns with additional wording in part A i will prejudice the delivery of site allocations. Part A i 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 separate and distinct settlements rather than being absorbed within the main urban area. Clarity will be provided that this relates to rural gaps only. Site OD 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 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.	Yes	include wording to make clear that 'maintain the physical separation of settlements and urban areas' relates to rural gaps. Remove 'traditional' from Aii
LPRI98a	Environment	Angela and Michael	Parkland Heritage Network (Blackwell)		Policy	ENV3 - Local Landscape Character		Support	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 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
LPRI99a	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 / Jo 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 DLP. While our Client broadly supports the intentions of the policy and recognises that development should be conservative 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 stymie 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 ii 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 separate and distinct settlements rather than being absorbed within the main urban area. Clarity is proposed 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 separation of settlements and urban areas' relates to rural gaps. Remove 'traditional' from Aiii

LPR115c	Environment	Emma Williams	Church Commissioners 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 (ii), 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 (ii) – Conservation of Traditional Landscape Features	Concerns with additional wording in part A i and ii 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 separate and distinct settlements rather than being absorbed within the main urban area. Clarity is proposed 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 separation of settlements and urban areas' relates to rural gaps. Remove 'traditional' from Aiii
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)	ENV3 - Landscape		HL/HF 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 criterion - 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

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 AGS. 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 LANS 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 LANS 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, Spawforth Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, 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. 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, Spawforth Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, 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 / 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	Twist 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, 51 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 ENVS 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 ENVS 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.
LRP029f	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, Skertingham, 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, Skertingham, 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
LRP029g	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, Skertingham, 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, Skertingham, 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
LRP032b	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-rpg/planning/planning-and-environmental-policy/local-plan-review/local-green-space-consultation/	No	None
LRP043	Environment	Cllr Jamie Barch	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
LRP061	Environment	Councillor Kate Ma	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 407)' for further detail on Local Green Space Considerations.	No	
LRP106a	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 are 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 you apparently 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, I have 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 specifying reasons behind the decision on 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 expect this 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 process that 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 lack of consistency 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 the Summary 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 provided 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 consultation in line with their communication preference.	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 - em	Community Campaigner, Civic Heritage, InfoArea 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, Bampton and High Consiliffe 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 Bampton 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 Bampton 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 Consiliffe and Skerningham areas.	Noted on yellow wagtail and 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 update to the GI Strategy. Reference to pollinator friendly 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, 8.9.6.6, 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 importance 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 BMG hierarchy 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 Heils, Newcastle upon Tyne NE4 5B2	Policy	ENV7 - Biodiversity and Geodiversity and Development (Strategic Policy)		Neutral	It is recognised that some minor amendments have generally been made to the adopted DLP Policy ENV7 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 ENV7 until this is justified by further evidence being provided. Secondly, our Client welcomes the retained flexibility within draft Policy ENV7 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 ENV7. 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 sites). Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites 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 advise 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 ENV8 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 ENV5. We welcome the commitment to protecting Local Geological Sites, including the existing sites at Killerby (North Lane Quarry), Houghton-le-Side (Disused Quarry, Site 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 hedgerow 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 hedgerow 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	ENVB – 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 KSPB 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 has 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	ENVB – 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	ENVB - 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 referenced 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 location, 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	ENVB - Assessing a Development's Impact on Biodiversity (strategic)		Neutral	Vistry has no objection in principle to the requirements outlined in Policy ENVB 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 for 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	ENVB - 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 hedgehog 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 Heila, Newcastle upon Tyne NE4 5BZ	Policy	ENVB - 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, Leeds, WF 2AB 01924873873 07841 621232	Policy	Policy ENVB: 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 & 112i	Environment	Ben Westwood / Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5B2	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.	Type 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 5B2	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 18.3 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 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 mandating 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 Consciffe Road, Darlington, DL3 7EH 01325 469243	Policy	Policy ENV 10 Trees and Hedges		Support/Unknown	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 /	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Heils, Newcastle upon Tyne, NE4 5B2	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 distributor 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 stymie 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 be to 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.

LPR071i	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	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 recommends 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 5B2	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 england 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 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, DPF Planning, Studio 14, Heyfotts, St Thomas Street, Newcastle upon Tyne, NE1 4LE, lee.fulcher@dpkuktd.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
LPR104i	Environment	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawforths Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, 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 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, Leeds, 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 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, jeremyg@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 (2023) 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 (2023) 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 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	

LPR reference (starting Topic	Name	Organisation	Agent name and address	Site / Policy / Section	Site Details	Policy Details	Section Details	Object / Subject	Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
LP032e	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 detail is required on 'safe routes to schools'. Impact of strategic routes like the A1 and A66 also considered a major obstacle.	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 connectors 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 'severance caused by strategic infrastructure' to IN 1 Aiii
LP049b	Transport and Infrastructure	Ken Maddison - sub	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 Standrop 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	
LP074	Transport and Infrastructure	Leanne Carroll	Resident		Policy	IN1 – Delivering a Sustainable Transport Network (strategic)		Neutral	Policy IN1 C iv 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 DNR 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 referring to all roads as 'link roads' we appreciate this differs from other references to 'Skerningham distributor road'. Alterations to the wording have been proposed for clarity. It should be noted these changes also apply to the Burtree allocation.	Yes	
LP087q	Transport and Infrastructure	Joe Smith	Savills for Miller Homes and Durham Cathedral	Joe Smith, Savills, The Lumens, 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 suggests that the mitigation requirements for committed and allocated development to 2042 also remains as previously identified. This is reiterated 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	Noting that further work is required for the extended plan period.	Agreed and work will be commissioned. 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 & 129u	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 wording in 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.	Yes	In Policy IN 10 which covers the provision of new community 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 Infrastructure 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.	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	Plan viability work is being prepared.	

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 acceptable.	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 5B2	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 for both residential and non-residential development. When focusing on residential development only, such contributions vary significantly from £300 to £1800 per dwelling. 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 financial 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 Concliffe 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 <u>should not be followed slavishly</u> 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 Coniscliffe Road, Darlington, DL3 7EH 01325 469245	Policy		Policy IN 2 Improving Access and Accessibility		Support/Ob	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 of 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, Spaworths 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, Spaworths 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, 701325469236, 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 site 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 Costes	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 Commissioners 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 development. 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 & 68n	Transport and Infrastructure	Georgina Cox	Gladman		Policy		IN2 - Improving Access and Accessibility (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.	No	
LPR116g	Transport and Infrastructure	Jack Conroy	Thrivest 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 Document (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 document 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 regard to' the latest guidance 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 DLP 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 guidance.	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 regard to' the latest guidance 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 Assessments including EVC	Neutral	This policy inter alia requires that new residential properties are required to provide suitable electric vehicle charging points. The Council however, no doubt be aware that the requirement for electric vehicle charging points is contained in Part 5 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 5 of building regulations.	The policy wording is more focused on giving thought to how charging facilities are provided and avoiding creating highway safety concerns. It is not considered this duplicates 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 5 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 5 of building regulations.	The policy wording is more focused on giving thought to how charging facilities are provided and avoiding creating highway safety concerns. It is not considered this duplicates building regulations.	No				
LPR087i	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 5B2	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 5 of building regulations.	The policy wording is more focused on giving thought to how charging facilities are provided and avoiding creating highway safety concerns. It is not considered this duplicates building regulations.	No				
LPR104w	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawfords Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, 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 5 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 5 of building regulations.	The policy wording is more focused on giving thought to how charging facilities are provided and avoiding creating highway safety concerns. It is not considered this duplicates building regulations.	No				
LPR105w	Transport and Infrastructure	Andrew Rose	Taylor Wimpey	Andrew Rose, Spawfords Planner & Architects, Junction 41 Business Court East Ardsley, Leeds, WF 2AB 01924873873 07841 621240	Policy		IN4 - Parking Provision including 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 5 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 5 of building regulations.	The policy wording is more focused on giving thought to how charging facilities are provided and avoiding creating highway safety concerns. It is not considered this duplicates 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 5 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 5 of building regulations.	The policy wording is more focused on giving thought to how charging facilities are provided and avoiding creating highway safety concerns. It is not considered this duplicates 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 development 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 Policy IN6 which could instead stall and frustrate delivery.	Inclusion of a Utilities policy is not considered necessary as it is considered to be considered 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 is considered to be considered 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 5B2	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 is considered to be considered 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 5B2	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 is considered to be considered 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 is considered to be considered 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 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.	Inclusion of a broadband policy is not considered necessary as it considered to be considered 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 5B2	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 considered 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, Spawfords 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 considered 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 considered 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, Spawfords 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 considered 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 digesters.	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 digesters 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 from 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 5B2	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 infrastructure 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 health facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and encourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all circumstances.	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 Regulations (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 assessments to ensure deliverability isn't affected.	Provision of health facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and encourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all circumstances.	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 demonstrate additional contributions do not adversely impact delivery.	Provision of health facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and encourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all circumstances. A viability assessment is being produced to test the impact 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 health facilities will always be dependent on numerous factors. All a Local Plan can do is secure land in suitable locations and encourage new provision. Financial contributions can help to facilitate some new capacity at existing or new surgeries but this may not be appropriate in all circumstances. A viability assessment is being produced to test the impact 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 (li) 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 between 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 solely 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 are 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 improvement of routes). River corridors do serve a key function in the sustainable transport network. Contributions could be used to rectify some local flooding impacts.	No		

LPR044	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 removal of the reference to the interdependence 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.	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, Hoptown, 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? In the section Utilities under paragraph 10.10.5 regarding infrastructure capacity. I am very interested in how you have written the fact that Stresholme 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 Stresholme 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 Stresholme 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.	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 ensure the highway mitigations are referenced consistently. The DNLR Appraisal is produced by the Combined Authority.	Yes	Consistency 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 Stresholme 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 Stresholme 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 Stresholme 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 perceived 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 consulted 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 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	
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: - Police estate and facilities. - Technology and equipment. - 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 Skertingham Site Allocation. The route for the DNLR must therefore be set prior to any planning applications for Skertingham 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 (2010-40). Baseline water and sewerage policies must apply to all developments, not only those over 100 homes.	Objection raised to the perceived 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 ongoing 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 pursued 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 Skertingham Site Allocation. The route for the DNLR must therefore be decided prior to any planning applications for the Skertingham 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 Skertingham 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 necessarily 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	Noting that further modelling work is to be produced and encouraging further dialogue with National Highways. Noting that there are no significant changes to the proposed highway mitigations at this time.	Updated highway modelling 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 Skerringham 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 Skerringham 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 acknowledge that land reservations should help to deliver new facilities it does not guarantee 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		

LPRO53e	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 perceived 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	
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LPR reference (starting at LPR021)	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
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@wardadawa y.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 definition includes 'the filling of gaps' between buildings. Other gaps and 'rounding off' is considered to introduce too much uncertainty.	No	None

Reference (starting LPR059 & 60k	Topic	Name	Organisation	Agent name and address	Site / Policy / Site Details	Policy Details	Section Details	Object / Site Comments	Comment Summary	Officer Response	Change Required Yes/No	Proposed Changes
	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.	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 evidence 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 sites will begin delivering immediately (2026/27). The trajectory is backloaded and has substantial delivery risk. Little contingency 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 NPFF 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 undeveloped 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 occurring 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 NPFF 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 Lumens, St James Boulevard, Newcastle Hebb, Newcastle upon Tyne NE4 5B2	Section	20 Great Burdon	Appendix B	Object Client fully supports the retained allocation 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 concerns 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 NPFF. Criteria (d) – lacks flexibility and is not consistent with national policy. Consider rewording. Criteria (e) – is unjustified and inconsistent with the NPFF and PPG in relation to surface water flood risk. The criteria could preclude development in areas that could be acceptable by undertaking a site-specific flood risk assessment. Criteria (f) – includes an amendment which references the Skerne as an existing green corridor. This simply duplicates policy requirements of 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 (h) 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 (j) and (n) and therefore is still considered appropriate. A significant buffer	Yes	Amend allocation statement for site 20 Great Burdon criteria e to read - <u>Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.</u>
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 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 100 year 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 Hill 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 Hill 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 F23b 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&OR 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&OR 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 & 129s	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. 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 Farm, 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 & 129s	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 Commissioners 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. Criterion (d) - insertion of reference to existing and proposed green corridors is not necessary and duplicates policy within ENV4. The inserted wording should be deleted. Criterion (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". Criterion (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 mitigation to the A1(M) and reduce landscape impacts. Again criteria f was found to be appropriate and sound via the previous examination. No alterations are proposed to this.	Yes	Allocation statement site 100, after criteria c to read - <u>Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.</u>
LPR111 & 112a	Appendix	Ben Westwood / Jo Homes	Barratt David Wilson Homes	Savills UK Ltd, The Lumen, St James Boulevard, Newcastle Helix, Newcastle upon Tyne, NE4 5B2	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. Criterion (d) - insertion of reference to existing and proposed green corridors is not necessary and duplicates policy within ENV4. The inserted wording should be deleted. Criterion (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. Criteria (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 mitigation to the A1(M) and reduce landscape impacts. Again criteria f was found to be appropriate and sound via the previous examination. No alterations are proposed to this.	Yes	Amend allocation statement for site 100 Hall Farm, Branksome criteria c to read - <u>Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.</u>

LPR094a	Housing	David Marjoram	Mandale Homes	David Marjoram, ELG Planning, Gateway House, 55 Concliffe 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 be 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: <u>'Parts of the site are susceptible to surface water flooding. This should be taken into account when devising the drainage strategy for the site.'</u>
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/or existing 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 / Site Details	Policy Details	Section Details	Object / Su	Comments	Comment Summary	Officer Response	Change Required Yes/N	Proposed Changes
LPR026/027/	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 separate 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 Policies 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 2A8 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 2A8 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 brought 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 its 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 over 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 of 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.