

APPENDIX 5

Responses and Recommended Changes to Sustainability Appraisal

Comments can be viewed in full at www.darlington-consult.objective.co.uk/portal

Subject to member approval 'Officer Responses' will also be made available online.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Dr Ellen Bekker	Lead Adviser Natural England			DLPSA2		Sustainability Appraisal	Support	<p>Natural England considers this report to provide a good framework to assess the impacts from the Local Plan.</p> <p>We note that measures for monitoring will be included with the final report.</p> <p>As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).</p> <p>We would like to raise awareness that any monitoring indicators should relate to <u>the effects of the plan itself</u>, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions (i.e. an indicator on the general condition of SSSIs would not be suitable).</p> <p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:</p>	Support and comments noted. The suggested monitoring indicators will be considered during the preparation of the Proposed Submission Local Plan and accompanying updated Sustainability Appraisal.	No recommended changes.

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								<ul style="list-style-type: none"> Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. Percentage of major developments generating overall biodiversity enhancement. Hectares of biodiversity habitat delivered through strategic site allocation <p>Green infrastructure:</p> <ul style="list-style-type: none"> Percentage of the city's population having access to a natural greenspace within 400 metres of their home. Length of greenways constructed. Hectares of accessible open space per 1000 population. 		
Mr Fishdog Fisher				DLPSA1		Sustainability Appraisal	Object			
Mr Derek Dodwell	Darlington Association of Parish Councils			DLPSA31		Sustainability Appraisal	Neutral	"Sustainability" has become a watchword in planning terms since the NPPF. The Local Plan Sustainability Appraisal gives some indication of the depth and complexity of the process. The process is dependant in part in "weighing up" the pros and cons of a vast range of propositions, applied to policies across the whole spectrum of the Plan. Interestingly, it appears that no views or comments have been appended to the Sustainability Appraisal – probably because	Comments noted. The Draft Sustainability Appraisal, and before it the Sustainability Appraisal Framework, were both the subject of public consultation. In due course an updated Sustainability Appraisal will be the subject of public consultation alongside	No recommended changes.

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								of the detail and complexity of the Appraisal, and the fact that some knowledge is required to understand it. The importance of this process to decision-making in all planning matters lends weight to the suggestion made at the end of paragraph 2 above that there should be some form of community representation in its operation. The alternative is that public opinion will continue to be dependent on personal opinion – not necessarily well-informed – and prejudices.	the Proposed Submission Local Plan. This report of the consultation response on the Draft Sustainability Appraisal has informed the preparation of the updated Sustainability Appraisal.	
Ms Emily Hrycan	Historic England			DLPSA32		Sustainability Appraisal	Object	<p>Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>In view of our comments made on the local plan (see separate letter ref: PL00025675), which has suggested some changes to the Plan, we will not be providing detailed written comments on the sustainability appraisal. However, in commenting on the site allocations included within the Plan we have raised concerns about the content of the SA which does not provide an appropriate assessment of the sites to determine whether they can be allocated without harm to the historic environment.</p>	Where necessary, the Council has undertaken an evaluation of the likely impact of proposed allocation sites on those elements that contribute to the significance of heritage assets, including their settings, as part of a heritage impact assessment. This work was undertaken prior to their inclusion in the Proposed Submission Local Plan. The SA assessment for sites has been updated in line with the outcome of the impact assessment.	The SA assessment for sites has been updated in line with the outcome of the impact assessment.

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								<p>We would be happy to work with you to discuss the issues raised in our representation on the Plan in conjunction with the SA.</p> <p>If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>		
Mrs/Dr Bryony Holroyd				DLPSA3	1.3	Paragraph	Support	<p>I support this but believe it should go further - a true assessment of whether plans are sustainable (i.e. continuable indefinitely) requires the assessment of the carrying capacity of the Darlington area in terms of number of people and their resource requirements - water, fuel, fibres, food, building materials, greenhouse gas emissions etc. If we are already above that carrying capacity, this must detail how the town plans to contract and converge its resource use - both per person and in total - so that all global citizens can have a fair distribution of the world's resources. The Contraction and Convergence model by the Global Commons Institute, its evidence and principles are presented widely on the internet hence I don't think it's useful to provide any specific links. I cannot find evidence of such investigation into how many people can be safely supported in Darlington being completed, or the evidence being presented.</p>	<p>The Council's Sustainability Appraisal has been prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004 and EU Strategic Environmental Assessment (SEA) Directive, along with national policy and guidance. The assessment includes a baseline of available information on trends in a wide range of social, environmental and economic indicators for Darlington.</p>	No recommended changes.
Mrs/Dr Bryony Holroyd				DLPSA4	2.3	Paragraph	Support	<p>Again, this statement is good, but should go further - a measure of healthy activity for example time spent walking, cycling per day, and percentage using active travel to get to work, school, shops etc. should be included as a measure of whether the town is a Healthy New Town. This would help prioritise investment in active transport</p>	<p>The Sustainability Appraisal Baseline set out at Appendix B of the draft document contains a wide range of indicators of social, economic and environmental conditions in the Borough.</p>	No change recommended.

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								measures within the town, where deprived areas are often so because residents cannot afford a car, do not feel safe cycling on the road conditions (often terrifying, both drivers driving unsafely and broken road surface) and the limited public transport means they cannot easily access employment and other opportunities, so would also help reduce deprivation and inequality as well as improve health.		
Mrs/Dr Bryony Holroyd				DLPSA5	2.4	Paragraph	Support	I would add that the town is also of sub-regional importance for educational opportunities, as many students travel great distances to attend the QE sixth form college, Darlington College, and the Teesside University campus here.	Agreed. A new paragraph has been added to this section of the Draft Sustainability Appraisal to reflect the comment.	The following text has been added after paragraph 2.4: 'Darlington is of sub-regional importance for higher education opportunities, with students travelling from across the sub-region to attend Queen Elizabeth sixth form college, Darlington College, and Teesside University's Darlington campus.'
Mrs/Dr Bryony Holroyd				DLPSA6	2.5	Paragraph	Object	I disagree with the aspect that the Local Development Plan "helps make sure that development and regeneration contributes as best it can to the prosperity, health and quality of life in the Borough, and achieves more sustainable development overall" - this is toned in a very qualified and rather	Noted. The bullet point has been reworded accordingly.	The fourth bullet point under paragraph 2.5 has been amended to read: 'ensures that development and regeneration

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								negative way and should be rephrased to for example, the LDP should "ensure that development and regeneration contributes best to the health and quality of life in the Borough and achieves sustainable development" - it should also recognise that on a limited-size planet, infinite growth is unsustainable, so a maximum sustainable size for the town should be recognised beyond which Darlington could not safely be maintained ad infinitum.		contributes towards the prosperity, health and quality of life of people in the Borough and achieves sustainable development'
Mrs/Dr Bryony Holroyd				DLPSA7	2.10	Paragraph	Support	As already mentioned, identifying environmental limits, and therefore the limits to growth as they apply to Darlington, need to be identified in terms of resource needs / use and as it relates to Contraction and Convergence is important to ensure that over-development does not take place, and more people brought into the area than can be safely provided for sustainably.	Comment noted.	No change recommended.
Mrs/Dr Bryony Holroyd				DLPSA13	5.2	Paragraph	Object	I support all other aspects of this statement, however this statement should be amended to state that "homes will be of a high design and construction standard". Darlington should be aiming high, using high-quality prefabricated highly insulated building materials with renewable energy heating and green roofs - not building bog-standard properties which will shortly have to be retrofitted to improve their insulation, add renewable energy and take out fossil fuel heating systems to reduce the residents' unnecessary energy costs.	Agreed. The paragraph will be amended to reflect this comment.	Amend paragraph 5.2 to read: 'that new buildings will be of a good <u>high quality</u> design and construction standard;'
Mrs/Dr Bryony Holroyd				DLPSA19	7.1	Paragraph	Object	I strongly object to the 10,000 homes target: this is insufficiently evidenced and should be reviewed ASAP in light of updated information. In this austerity climate with Brexit about to hit our economy and all the	Please see officer response on housing requirement and standard method.	Please see officer response on housing requirement and standard method.

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								<p>major department stores in the town closing, this really doesn't seem correct or realistic. If they do all come, they would have to go and work elsewhere, significantly contributing to pollution from the required transport.</p> <p>Speaking as someone trying to sell a home in Darlington which, whilst very nice, has been on the market for over a year now despite reducing the price, house prices are already dropping in the town, and the construction of excess new homes could have a devastating effect on existing residents, driving some into negative equity. Yes, house prices need to stabilise and come closer to the level affordable by those on the median wage here, but this should not be a sudden drop or it will cause stagnation, possible abandonment of some older less-desirable areas of the town, and a waste of resources building unnecessary homes with the associated loss of green space.</p>		
Mrs/Dr Bryony Holroyd				DLPSA21	7.4	Paragraph	Object	<p>It should be made clear to developers that brownfield sites need to be developed first, and only greenfield development permitted if that does not sufficiently meet housing need. Of course developers will prioritise greenfield sites which have no clean-up issues to deal with first (with their associated costs) or other constraints fitting between existing development, but planning policy should be developed on the basis of what is best for the town and its type of housing need, not what can be turned around most quickly and cheaply by the developers, so this section is pretty irrelevant. We need more smaller affordable units which town centre flats, townhouses and sheltered accommodation would provide.</p>	<p>In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal.</p>	No change recommended.

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									Please see officer response on brownfield sites, urban sprawl and empty homes.	
Mrs/Dr Bryony Holroyd				DLPSA22	7.5	Paragraph	Object	No extension of the urban area should occur beyond the "outer ring road" of the town i.e. the A1, A66 and Salters Lane / Whinfield Road, as these form a natural boundary to urban sprawl. The A66 in particular will cease to serve its function as a bypass if developments are built off it near the football stadium or Morton Park. All must remain inside this natural limit, or be considered an extension to the nearest village beyond. I support infill development in appropriate locations within the existing town boundary, provided that sufficient green space is retained as part of the development and no community or nature sites are destroyed in the process e.g. Maidendale nature reserve.	<p>The Draft Local Plan does not include any development allocations beyond the A1(M) to the west and the A66 to the south and east of Darlington.</p> <p>The Skerningham and Greater Faverdale Strategic Allocations to the north of the town have been selected following the consideration of a number of potential strategic growth areas as part of the Issues and Scoping consultation in 2016 and subsequently the Sustainability Appraisal process. The North/North East of Darlington is considered to be a suitable, sustainable and deliverable location for a significant extension of the town.</p> <p>Policy ENV 4 and ENV 7, along with national policy, provide protection to green spaces and designated nature conservation sites.</p>	No change recommended.
Mrs/Dr Bryony Holroyd				DLPSA20	Figure 7.1	Issues and Scoping Paper, May 2016 - Potential Locations for Strategic Development	Object	Given I dispute the number of new homes required, I feel numbers could be met by constructing high density flats / maisonnettes / townhouses in car-free developments immediately around the town centre, converting abandoned and unused	Please see officer response on housing requirement and standard method, and on brownfield sites, urban sprawl and empty homes.	Please see officer response on housing requirement and standard method, and on

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								<p>nightclub and retail space to be suitable for small business units on the ground floor, small offices on the middle floor if required, and residential space on the upper floor(s) would go a long way to meeting the housing need for the town over many years to come, with the advantage of little or no new traffic issues generated due to the nature of the new homes, and a revitalised town centre from all the new people living in it - which may be more appealing to retain young people in the town. Any further necessary homes could be provided in small developments as needed in rural villages, redeveloping large old abandoned buildings and brownfield sites across the town etc., resulting in no need for expansion into greenbelt areas. These are by nature further distant from the town centre and employment opportunities so will be more car-dependent sites, significantly worsening traffic issues unless major new public transport and active transport infrastructure is also constructed. The focus of any development should be around train stations (with the aim of re-opening the airport station for full service for travellers and new residents in that area, and potentially creating a new train station on the Bishop Auckland line in the Burtree area to meet need there) and bus routes, and close to businesses with staff there having priority in purchasing the homes to reduce travel need.</p> <p>Development should not occur in the heritage countryside to the north of Darlington - with its renewable energy facility (wind turbines) and community woodland. This is already far distant from the town centre with a rural feel which</p>	<p>Please see officer response on the Skerningham Strategic Allocation.</p> <p>Please see officer response on the Skerningham Strategic Allocation.</p>	<p>brownfield sites, urban sprawl and empty homes.</p> <p>Please see officer response on the Skerningham Strategic Allocation.</p>

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								would be destroyed, and the land is accessed by significant numbers of people to leisure, dog walking etc. A very small amount of development infilling between the railway line and A67 at Harrowgate Hill might be supported, but no more than that. That is also the gateway view to Darlington from the north on the train - it's currently very visually appealing, but that would be significantly changed by a large sprawling development of new homes.		
Mrs/Dr Bryony Holroyd				DLPSA23	Figure 7.3	HELAA Assessment 2017	Object	<p>The key on this map does not show what the salmon pink colour means.</p> <p>I strongly disagree with the need for any development outside of the existing urban limits. Development should occur first close to the town centre to redevelop it, infill and redevelopment of brownfield sites elsewhere in the town, and only later small developments around the boundary of the town (but not beyond the A1, A66 and Salters Lane / Whinfield Road) if housing demand is still not met.</p>	<p>Figure 7.3 is taken from the HELAA 2017 and has not reproduced very well in this document, the salmon pink coloured sites are those that were considered not suitable for development by the HELAA.</p> <p>In line with the NPPF, the Council has sought to make effective use of land in prioritising the development of previously developed land where it is suitable and viable to do so. In selecting allocation sites on the urban edge, the Council has sought to avoid areas of highest landscape, environmental and agricultural value as considered in the Council's Sustainability Appraisal.</p>	No change recommended.
Mrs/Dr Bryony Holroyd				DLPSA8	Table 3.2	Relevant Plans, Policies and Programmes	Support	This list of commitments and plans is incomplete and requires an addition as Darlington has also signed up to meet the European Covenant of Mayors for Climate & Energy commitments - both more	Comment noted. This document will be added to Table 3.2 and the Review of Plans, Policies and Programmes at Appendix A.	Add the European Covenant of Mayors for Climate &

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								ambitious and broad-ranging than EU climate commitments: signatories commit to developing a Sustainable Energy (and Climate) Action Plan within two years. Signatory cities pledge to actively support the implementation of the EU 40% greenhouse gas-reduction target (in total carbon emissions for the area, not per capita) by 2030 and agree to adopt an integrated approach to climate change mitigation and adaptation and to ensure access to secure, sustainable and affordable energy for all. Darlington's action Plan includes an Overall CO ₂ emission reduction target of 21% by 2030 - it should be highlighted that this commitment is in total not per capita, so massively growing the town by 20% will make this harder to meet.		Energy to Table 3.2 and the Review of Plans, Policies and Programmes at Appendix A.
Marion Williams	Environment Agency			DLPSA33	Table 3.2	Relevant Plans, Policies and Programmes	Neutral	<p>Table 3.2 Relevant Plans Policies and Programmes should include: A Green Future: Our 25 Year Plan to Improve the Environment, DEFRA, 11 January 2018. This should be integrated into the plan as it describes the goals the government, and therefore LPAs, are looking to achieve.</p> <p>The River Basin Management Plan, Northumbria River Basin District (Environment Agency, 2009) has been superseded by the 2015 version. The information in Appendix A page 54 is likely to be out of date. The baseline used in Appendix B page 111 does contain a link to the 2015 plan and uses 2015 data as a baseline.</p>	Comment acknowledged. These documents have been added and updated in Table 3.2 and Appendix A of the Sustainability Appraisal.	The information in Table 3.2 and Appendix A of the Sustainability Appraisal has been amended accordingly.
Mrs/Dr Bryony				DLPSA9	Table 3.3	Sustainability Issues and Problems	Support	I agree with all of the below except for, in the section on congestion and pollution "Identified need to tackle congestion and network capacity" - predict and provide is	The purpose of Table 3.3 is simply to highlight key sustainability issues and problems facing the Borough	No change recommended.

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Holroyd								<p>proven not to work in this arena, building more roads encourages more private car travel, hence this aspect should be rephrased to emphasise "reducing the need for private car travel, and hence reducing resultant pollution, freeing up capacity for essential journeys". Ideally this should be done by reducing network capacity for private cars and increasing capacity for other more space and fuel-efficient transport methods such as walking, cycling and public transport.</p> <p>Also "To tackle climate continued effort is required to reduce CO2 emissions and increase the generation of renewable energy at a local level." is very vague - this should detail aspects such as improved insulation of the town's homes, reduced dependence on fossil fuels for heating (gas and oil in areas not served by mains gas) and for transport, developing local sustainable organic food sources, reducing meat and dairy consumption, and other sustainable consumption habits such as developing repair and re-use centres to reduce waste of resources going to landfill - it's not only about renewable energy, much as that also needs to be increased as well.</p> <p>I do particularly agree with the assessment of varied provision of open space which needs to be rectified. Particularly gaps are identified in play facilities for children in College ward as there are none - perhaps part of the Abbey school site could be opened up for use by the public outside of school hours - and general greenery and open leisure space in Bank Top and Northgate wards.</p>	<p>following the review of plans, policies and programmes and baseline data for the area. The policies contained within the emerging Local Plan provide the approach that the Council intends to take to tackle these issues and the wider objectives of the plan.</p> <p>A number of the comments made are reflected in the Sustainability Framework set out in Table 4.1, such as reducing the need for travel by private vehicle and encouraging the use of more sustainable forms of travel is an objective of the emerging Local Plan, reflected by Sustainability Appraisal Objective 7. It is against the sustainability appraisal objectives and decision making criteria of the Sustainability Framework that the strategy, policy and site options for the Local Plan have been assessed in the Sustainability Appraisal.</p> <p>The Council have reviewed the decision to move the library from its current location in Crown Street and decided not to relocate it at this point in time. .</p>	

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								There is a significant risk to a heritage building in the plans to relocate Crown Street Library from the Library building. With a covenant on the building to prevent its use for anything else the council will not be able to sell it, meaning it will be boarded up until some arsonist is likely to burn it down. This is a very unpleasant thought and should not be allowed to happen - the best way of doing this is to retain it as a Library, and find other different and more appropriate services to fit into the spare space in the Dolphin Centre more likely to bring in the extra income that is needed.		
Marion Williams	Environment Agency			DLPSA34	Table 3.3	Sustainability Issues and Problems	Neutral	<p>Climate Change & Energy Protecting and enhancing ecological networks and making space for changes to rivers:</p> <p>Suggested revised wording – ‘Likewise, planning should allow space for natural changes to rivers caused by changing climatic conditions and their normal geomorphological processes.’</p>	Agreed. The suggested change has been made to Table 3.3.	The final sentence of the summary under Climate Change and Energy - Protecting and enhancing ecological networks and making space for changes to rivers in Table 3.3. has been amended to read: 'Likewise, planning should allow space for natural changes to rivers caused by changing climatic conditions <u>and their normal geomorphological processes.</u> '

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Marion Williams	Environment Agency			DLPSA35	Table 3.3	Sustainability Issues and Problems	Neutral	We recommend the Council also considers reducing other air pollutants which have a harmful effect on human health and the environment, for example NOx and particulates from traffic, farming and some industrial processes.	Agreed. The suggested change has been made to Table 3.3.	The title of the first entry under Climate Change and Energy in Table 3.3 to: 'Reducing carbon dioxide harmful emission outputs and increasing renewable energy generation.' and amend the accompanying summary text has been amended to read: 'To tackle climate continued effort is required to reduce CO2 carbon dioxide, nitrogen oxide and other harmful emissions and increase the generation of renewable energy at a local level.'
Marion Williams	Environment Agency			DLPSA36	Table 3.3	Sustainability Issues and Problems	Neutral	Environmental Protection Some rivers of poor and bad ecological quality Suggested revised wording – 'A number of tributaries of the Tees and Skerne are not currently at good status under the WDF, in particular the Neasham Stell was classified as of bad ecological quality in 2015.'	Agree. The suggested change has been made to Table 3.3.	The summary under Environmental Protection - Some rivers of poor and bad ecological quality in Table 3.3. has been amended to

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										read: 'A number of tributaries of the Tees and Skerne are of poor ecological quality <u>not currently classified as being of good ecological status under the Water Framework Directive</u> , in particular the Neasham Stell was classified as of bad ecological quality in 2015.'
Marion Williams	Environment Agency			DLPSA37	Table 3.3	Sustainability Issues and Problems	Neutral	We recommend the Council aims to achieve a protected habitat net gain over the period of the Local Plan.	Agree. Table 3.3. has been amended to reflect the aim of achieving net gains for biodiversity in the NPPF	The following text has been added in Table 3.3 at the end of the summary under Biodiversity and Geodiversity - Protecting the best and most versatile agricultural land, priority habitats and species and expanding range where possible: <u>Aim to achieve net gains for biodiversity in line with the NPPF.</u>

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Mrs/Dr Bryony Holroyd				DLPSA10	Table 4.1	Sustainability Framework	Neutral	<p>Some aspects in this table I disagree with, some need to go further:</p> <p>Point 3 in this list about active and healthy lifestyles fails to mention active travel, this is not a leisure activity but a key part of getting about for all routine journeys - a key point to measure should be the percentage of people travelling actively to work, to get to leisure pursuits, to the shops and for all other journeys. Healthy activity should be built in as an integral part of the daily routine, and not seen "only" as bolt-on "leisure activity". Payment of incentives by local employers should be encouraged for employees to walk or cycle to work (as it's shown they take fewer sick days), as well as salary sacrifice schemes to pay for annual public transport passes.</p> <p>in point 4, I would also urge that policies should also attempt to address the shortage of teachers, as many leave the profession completely, go part-time or teach supply-only due to poor work-life balance and stress. At a minimum, encourage teachers from other parts of the country to relocate to Darlington where their salary will go further.</p> <p>Point 5.c is particularly important in light of active transport - the town's highways are currently NOT safe for it, and no significant improvements in participation will be seen unless walking and cycling infrastructure protected from motorised vehicles is constructed across the borough, prioritised over those vehicles at junctions. It would be irresponsible to urge greater active transport in point 3 without providing necessary infrastructure to first ensure</p>	<p>The Sustainability Appraisal Objectives (SAO) set out in table 4.1 need to be read as a whole, SAO1 stipulates that new housing should be delivered in sustainable locations with access to a range of local services and facilities within easy walking and cycling distance with the intention of promoting these forms of transport both to reduce the use of private vehicles and improve the health of residents.</p> <p>Local planning policies contained in the Local Plan cannot require employers to offer incentives for employees to walk/cycle to work, address shortages of teachers or influence parking/highways enforcement.</p> <p>It is possible to sustain economic growth alongside population growth in order to maintain a stable and prosperous economy with a range of employment opportunities for residents. As mentioned, with new low carbon technologies and cleaner energy and travel options economic growth does not necessarily imply that there will be associated negative environmental effects.</p>	No change recommended.

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								<p>safety, otherwise take-up will be poor, road deaths will increase and no health or safety benefits will be seen. Bite the bullet and re-prioritise the road space away from cars which are a very inefficient use of space and a real danger for all others trying to get about. In the meantime, serious enforcement is required of pavement parking, close passing of cyclists, dangerous driving such as overtaking at junctions and on roundabouts, jumping red lights, stopping in cyclist advance stop lines and hatched junctions, speeding, and aggression towards other vulnerable road users - there is no penalty in this town for behaviour which risks the life of others.</p> <p>Point 6 should NOT be about economic growth - growth on a fixed-size planet with limited resources is not sustainable. It should be about having a stable economy, in neither growth or decline - prosperity without growth - with new low-carbon businesses developing to replace old high-carbon businesses as they go into managed decline, with retraining opportunities provided to employees as required.</p> <p>Phrase point 7 as "Provide development which maximises access to public transport and active travel modes, and minimises reliance on private vehicles." to make clear that new development should be specifically designed so that the former part of the sentence provides the majority of the residents' transport needs.</p> <p>Point 8 requires adding a section f: will it facilitate the use of low-carbon fuels / energy for home heating and lighting?</p>	Sustainability Appraisal Objective 8 includes a decision making criteria relating to the generation of renewable energy.	

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Marion Williams	Environment Agency			DLPSA38	Table 4.1	Sustainability Framework	Neutral	3 - This section could be strengthened by aiming to reduce the impact of short term peaks and long term effects of air pollution across the area, from traffic, farming and some industrial processes. One example could be preventing playgrounds being built next to busy roads and re-site existing play grounds in areas of high pollution, or making safe walkways to school, away from busy roads.	The purpose of Table 4.1 is to provide a framework against which policies and proposals in the Local Plan can be assessed. The framework contains a number of objectives that, either directly or indirectly, seek to reduce the impact of the Local Plan on air pollution.	No change recommended.
Marion Williams	Environment Agency			DLPSA39	Table 4.1	Sustainability Framework	Neutral	8 - The local plan only refers to reducing carbon dioxide but here the aim is to reduce all greenhouse gases, it needs to be consistent. We recommend targeting CO ₂ , CO, NO _x , SO ₂ and particulates, but targets must be evidence-based.	<p>Comment noted. Sustainability Appraisal Objective 8 of Table 4.1 refers to the reduction of greenhouse gases, it does not single out carbon dioxide. Table 3.3 has been amended to include reference to other greenhouse gases.</p> <p>An updated Sustainability Appraisal report has been prepared to accompany the Proposed Submission Local Plan that includes proposed monitoring measures.</p>	The first row under Climate Change and Energy in Table 3.3 has been amended to refer to all greenhouse gas emissions as opposed to just carbon dioxide.
Marion Williams	Environment Agency			DLPSA40	Table 4.1	Sustainability Framework	Neutral	10 - There are no references to minimising air pollution, dust, fumes, smoke, commercial waste.	<p>Comment noted. Air pollution is dealt with under Sustainability Appraisal Objective 8. However, decision making criteria a. has been amended to include reference to other forms of air pollution including fumes and smoke.</p> <p>Decision making criteria d. of Sustainability Appraisal Objective 9 includes provision</p>	The decision making criterion a. of Sustainability Appraisal Objective 8. Reduce greenhouse gas emissions and increase the borough's resilience to climate change (Table 4.1) has

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									<p>for whether proposals will increase the prevention, re-use, recovery and recycling of waste.</p> <p>Sustainability Appraisal Objective 10 has been amended to include reference to dust.</p>	<p>been amended to read: 'a. Will it reduce emissions of greenhouse gases <u>(and other sources of air pollution including fumes and smoke)</u>, including by encouraging energy efficiency?'</p> <p>Sustainability Appraisal Objective 10. Minimise levels of noise, vibration, odour and light pollution, and decision making criteria a. (Table 4.1) has been amended to read: '10. Minimise levels of noise, vibration, <u>dust</u>, odour and light pollution.'</p> <p>Decision making criteria a. of Sustainability Appraisal Objective 10. Minimise levels of noise, vibration, odour</p>

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										and light pollution (Table 4.1) has been amended to read: 'Will is avoid unacceptable levels of noise, vibration, <u>dust</u> , o dour and light pollution?'
Marion Williams	Environment Agency			DLPSA41	Table 4.1	Sustainability Framework	Neutral	12 - We recommend the Council reviews the location of their air monitoring equipment across the Borough, to ensure representative results upon which to base their air quality improvements targets. It is possible that the locations of air monitoring stations have remained unchanged for many years yet the location of peak emissions have changed. We also recommend the decision making criteria is extended when considering air pollution, with the aim to reduce air pollution at all sources not just at the monitoring locations.	<p>The purpose of Table 4.1 is to provide a framework against which policies and proposals in the Local Plan can be assessed. The framework contains a number of objectives that, either directly or indirectly, seek to reduce the impact of the Local Plan on air pollution.</p> <p>An updated Sustainability Appraisal report has been prepared to accompany the Proposed Submission Local Plan that includes proposed monitoring measures. Whilst the point about the location of air monitoring stations is acknowledged and will be considered further, any monitoring measure included within the Sustainability Appraisal and Local Plan need to be manageable, and therefore focusing on locations with air monitoring equipment is appropriate.</p>	No recommended changes.

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Marion Williams	Environment Agency			DLPSA42	Table 4.1	Sustainability Framework	Neutral	<p>13 – We suggest a supplementary decision-making criteria: f) Will it protect or improve the geomorphological condition of a waterbody?</p> <p>We recommend the criteria seeks to contribute to a habitat net gain across the Borough. Revised wording b) Will it maximise the use of brownfield land and minimise the loss of greenfield and ecologically diverse and valuable land to development?</p>	<p>Comment noted. An additional decision making criteria has been added under Sustainability Appraisal Objective 13 as suggested.</p> <p>The wording of decision making criteria a under Sustainability Appraisal Objective 13 has been amended to include reference to making net gains in biodiversity. The site assessment rationale set out at Appendix F for this objective already includes a score that accounts for sites with the potential to deliver net gains in biodiversity so this change will not affect the results of the assessments already undertaken.</p> <p>The final suggested change to Sustainability Appraisal Objective 9 would duplicate the provisions of Sustainability Appraisal Objective 13 that seeks to protect and enhance biodiversity.</p>	<p>A new decision making criteria under Sustainability Appraisal Objective 13. Protect and enhance biodiversity and geodiversity (Table 4.1) has been added to read: '<u>f) Will it protect or improve the geomorphological condition of a waterbody?</u>'</p> <p>Decision making criteria a. under Sustainability Appraisal Objective 13. Protect and enhance biodiversity and geodiversity (Table 4.1) has been amended to read: 'a. Will it protect and enhance ecological networks and locally designated nature conservation sites, <u>resulting in net gains for biodiversity?</u>'</p>

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Mrs/Dr Bryony Holroyd				DLPSA11	Table 4.2	Balance between social, economic and environmental considerations	Object	<p>Many aspects described below should have strong environmental aspects to their consideration - for example in point 1, well designed and located housing needs to be well insulated, have low carbon heating systems, renewable energy and SUDS built in, the location and design of the development should naturally prioritise active transport and be well served by public transport, or ideally part of mixed development so residents can work close by, all of which MUST be properly taken into account under the environmental theme.</p> <p>Similarly in point 3, health, wellbeing and lifestyles needs to promote access to green space, and wild space / countryside, also active and sustainable transport, encouraging more participation in organic allotment gardening and eating the resultant healthy low carbon food - all of which has important ecological and environmental aspects to it, maintaining green space and biodiversity, reducing carbon emissions from transport and the food supply, and reducing pesticide use and food waste.</p> <p>In point 6, there is no such thing as sustainable economic growth. The aim should be a stable economy with no growth or de-growth.</p>	<p>Comments noted. The scoring in table 4.2 under objectives 1 and 3 has been amended to reflect the fact that their achievement will require environmental considerations/improvements.</p> <p>Disagree with the final point. It is possible to sustain economic growth alongside population growth in order to maintain a stable and prosperous economy with a range of employment opportunities for residents.</p>	Table 4.2 has been amended to show that Sustainable Objectives 1 and 3 will involve environmental considerations.
Mrs/Dr Bryony Holroyd				DLPSA12	Table 4.5	Compatability Testing of the Sustainability Objectives	Support	Overall support this assessment but object in terms of point 5 - where this overlaps with point 8 (climate change) and point 11 (flood risk) there will be a positive overlap since reducing impacts of climate change and extreme weather and floods will naturally help to reduce any impact on people's health and safety and that of their property (which	Agreed. The table has been amended to reflect this comment.	Table 4.5 has been amended to show a positive relationship between Sustainable Objective 5 and

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								could otherwise hypothetically burn in a wildfire or be washed away by floodwater).		objectives 8 and 11.
Chris McGough	Director McGough Planning Consultants Limited			DLPSA28	Table 8.1		Object	<p>It is not possible to be certain if these assessments relate to just the vacant land to the north of Hansteen's site or the combined sites, as the red boundary of 22 suggests.</p> <p>The LPA granted planning permission in 2015 for an Asda super-store and PFS on this site after accepting that employment development was not financially viable - due to the cost of remediating contaminants from its former industrial use. In the committee report, Officers noted: "(we) do not dispute the evidence submitted and consider that the site, which has been vacant for nine years, is likely to remain vacant unless it is released for an alternative use".</p> <p>Paragraph 22 of the NPPF affirms that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.</p> <p>The viability concerns affecting Hansteen's land have not changed in the three years since the Asda permission was approved. Employment development is still not viable. In addition, a planning application for another retail development involving Lidl, Home Bargains and a Starbucks drive-thru on half the site has recently been submitted. This proposal was the subject of a pre-application submission and in an email dated 18 October 2017, Officers summarised their position on the retail element of the proposal by stating, "I have checked with our Policy</p>	<p>Site 22 covers the Hansteen's site and the vacant land to the north.</p> <p>The assessment of potential development sites in the Sustainability Appraisal does not take into account the viability of development, only their relative social, economic and environmental sustainability. However, the assessment has been amended to better reflect the known contamination issues on this site.</p>	<p>The commentary under Sustainability Objective 9, and in the Overall Predicted Effect/Potential Mitigation sections of site assessment tables for Site 22: Land off Faverdale West (Tables 22H and 22E) has been amended to reflect the known contamination issues on this site and the requirement for remediation.</p>

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Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								<p>Team, and they confirm that the principle of retail on this site is agreed..".</p> <p>None of this is reflected in the assessment. Without this, it is unsurprising the assessment concludes continued employment if fine; however, with this information, it would be unreasonable for the assessment to conclude as it does. The assessment should be updated to include the information on our client's land's planning history and viability concerns.</p>		
Marion Williams	Environment Agency			DLPSA43		APPENDIX B: SUSTAINABILITY APPRAISAL BASELINE	Neutral	<p>Climate & Energy – Renewable Energy – trends page 105 typo “The number of renewable electricity generating installations in Darlington increased by 72% between 2015 and 2015.”</p> <p>Designated Sites – SSSI - This target is only until 2020 (as under Biodiversity 2020 target) this needs to be revised and looked at longer term to tie in with the timescale of this document.</p> <p>Priority Species –there only targets for three species, there should be a target set for each.</p>	Comments noted. The Sustainability Appraisal Baseline has been updated as part of the Sustainability Appraisal submitted alongside the Proposed Submission Local Plan. These points have been addressed, where necessary, in the updated baseline.	Changes have been made to the Sustainability Appraisal Baseline (Appendix B), as necessary, to respond to the points raised in the comment.
Mrs/Dr Bryony Holroyd				DLPSA14		APPENDIX C: ASSESSMENT OF LOCAL PLAN OBJECTIVES	Neutral	<p>The comment contains a number of suggested changes to the Local Plan Objectives. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p>	The Local Plan Objectives are set out in the Draft Local Plan that was the subject of consultation at the same time as the Sustainability Appraisal. The purpose of Appendix C is to assess the compatibility of the emerging Local Plan Objectives against the Sustainability Appraisal Objectives.	No change recommended.

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Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
Chris McGough	Director McGough Planning Consultants Limited			DLPSA29	Table E 1		Object	<p>This site forms part of allocation 343 on the Faverdale Industrial Estate. Opting for option C would continue the allocation for B1, B2 and B8 employment use, which is not viable or sustainable in this case.</p> <p>The LPA granted planning permission in 2015 for an Asda super-store and PFS on this site after accepting that employment development was not financially viable - due to the cost of remediating contaminants from its former industrial use. In the committee report, Officers noted: “(we) do not dispute the evidence submitted and consider that the site, which has been vacant for nine years, is likely to remain vacant unless it is released for an alternative use”.</p> <p>Paragraph 22 of the NPPF affirms that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.</p> <p>The viability concerns affecting Hansteen's land have not changed in the three years since the Asda permission was approved. Employment development is still not viable. In addition, a planning application for another retail development involving Lidl, Home Bargains and a Starbucks drive-thru on half the site has recently been submitted. This proposal was the subject of a pre-application submission and in an email dated 18 October 2017, Officers summarised their position on the retail element of the proposal by stating, “ I have checked with our Policy</p>	<p>Whether or not the site in question is designated as employment land in the Local Plan has no bearing on the Council's assessment of potential policy approaches in the Sustainability Appraisal.</p> <p>As stated, the site in question has extant permission for convenience retail uses, an employment generating use, that is unaffected by its designation under Policy E1. However, should this use of the site cease in the future an alternative class B1, B2 and/or B8 use would be considered appropriate given its location.</p>	No change recommended.

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								<p>Team, and they confirm that the principle of retail on this site is agreed..".</p> <p>Given this context, the continued allocation of Hansteen's Faverdale land is at odds with the NPPF and would clearly fail the soundness test. Hansteen's land should be excluded for allocation 343 in policy E1. Clearly, this will require a changing the option for the SA from C.</p>		
Mrs/Dr Bryony Holroyd				DLPSA17	Table ENV 1		Object	<p>The comment contains a number of suggested changes to the assessment of environment policy options. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p> <p>Table ENV 1, Historic environment: I disagree that Option B is the appropriate one, Option C should be followed - there are a quite limited number of historic sites in the Borough and it is worth protecting them.</p> <p>Table ENV4, Green infrastructure: Option C should be followed. Darlington has limited green infrastructure within the urban area that is irreplaceable, so should rightly be strongly protected. Around the outside of the urban area there are also key river and woodland / wildlife corridors essential for flood protection and also well-used public footpaths for healthy and active leisure pursuits.</p> <p>Table ENV7, Biodiversity and Geodiversity: it is right that development should be restricted in certain areas of key biodiversity or geological interest, so it must be ensured</p>	<p>Table ENV 1 - Option B still places a strong emphasis on the protection of the Borough's historic environment but would allow a degree of flexibility to enable the the potential harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposed development in decision making, in line with national policy.</p> <p>Table ENV 4 - Policy option B does place great importance on green infrastructure, providing for the protection for existing green infrastructure along with delivering new green infrastructure with new development.</p> <p>Table ENV 7 - Policy ENV 7 is not only concerned with designated heritage assets that are afforded strong protection through national policy and legislation. In line with</p>	No change recommended.

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								<p>that SSSIs and other key biodiversity sites are never under consideration for development - option C is preferred.</p> <p>Table ENV 9, outdoor sports: please include cycle commuting in the "outdoor sports" strategy and related considerations.</p>	<p>national policy the priority will always be to avoid impacts on biodiversity, adequately mitigate, and only as a last resort be compensated for. Whilst it may take time to establish, given the right conditions new habitats, including woodlands, can be created alongside development. There are already a number of successful examples in the Borough, including the community woodlands.</p> <p>Table ENV 9 - comment noted. Policies ENV 4, IN 1 and other policies in the emerging plan seek to protect and enhance pedestrian and cycle routes across the borough for their health and environmental benefits.</p>	
Mrs/Dr Bryony Holroyd				DLPSA15	Table H 1		Object	<p>The comment contains a number of suggested changes to the assessment of housing policy options. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p> <p>Table H1, Housing Requirements, it is unclear why the lower growth (or even reductions in jobs in the town) are perceived to have very negative effects.</p> <p>Table H3, tighter development limits would result in denser development within and immediately around the urban area and</p>	<p>Table H 1- As discussed in the summary for option D, planning for a lower housing target could potentially have negative effects associated with choosing this option as locally projected housing needs will be unmet and the Borough would effectively be planning for economic decline. The Local Plan is to be reviewed regularly, at least every 5 years, including an</p>	No change recommended.

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								<p>villages, closer to public transport and more viable to access services on foot and by bicycle. Option C would therefore be more positive in terms of Objectives 7, 8, 13 and 14.</p> <p>Table H5, Affordable Housing, should provide a fixed affordable housing target for all developments in specific areas but with no exemptions, Option B but without option D.</p> <p>Table H8, Housing intensification - having experienced a relative in York suffering a complete change in character of their street due to conversion of a few of what were previously family homes to HMOs, resulting in 4 cars per property where previously only one or two were present, I would disagree with the removal of restriction on converting houses to HMOs without planning permission. Option A should be pursued.</p>	<p>update on housing requirements.</p> <p>Table H 3 - There would be little difference between the limits drawn under options B and C. Option B will however allow for some limited infilling and rounding off of settlements, particularly important to the development of smaller settlements over the plan period.</p> <p>Table H 5 - A policy combining both options B and D is considered to deliver a number of positives in terms of affordable housing delivery whilst at the same time being realistic about the viability of development in certain areas of the Borough and for certain types of development.</p> <p>Table H 8 - HMOs serve a purpose in the housing market providing a low cost and desirable housing option for some people. Therefore a criteria based policy with specific criteria to tackle some of the potential issues encountered with this type of housing is considered the most appropriate policy option.</p>	
Mrs/Dr Bryony				DLPSA18	Table IN 1		Object	The comment contains a number of suggested changes to the assessment of transport and infrastructure policy options. A	Table IN 1 - New road connections around the western, northern and eastern	No change recommended.

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Holroyd								<p>full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p> <p>Table IN1, sustainable transport network: I disagree that Option C should be part of considerations (Options A and B only are fine).</p> <p>Table IN2, accessibility: I agree! Particularly it should be ensured that all cycle routes and access points are accessible by disabled-adapted bicycles, cargo bikes and bikes fitted with tag-along trailers for children or goods.</p> <p>Table IN3, travel plans: I agree that local policy is best.</p> <p>Table IN4, parking provision: I disagree that Options A and B should be included. Option C only should be the preferred option. There are very large amounts of car parking for the town centre already and this needs to be reduced.</p> <p>Table IN9, renewables & energy efficiency: Does not go far enough. The Local Plan should lever in funding to improve energy efficiency and renewable energy in homes in other already existing parts of the town as part of new developments.</p>	<p>fringes of Darlington will deliver a number of benefits for residents and help to ease traffic in and around the town centre. This policy option does however need to be balanced by other options to encourage the use of more sustainable forms of travel.</p> <p>Table IN 2 - Comments noted.</p> <p>Table IN 3 - Comment noted. The assessments under Appendix D of the Sustainability Appraisal only consider the broad Local Plan policy options and not the detailed policy criteria/approach.</p> <p>Table IN 4 - There is still strong demand for people to be able to park in and around the town centre. However, this policy option must be balanced by other options to encourage the use of more sustainable forms of travel.</p> <p>Table IN 9 - Planning obligations can only be sought where all of the following tests are met in relation to a new development proposal: necessary to make the development acceptable in planning terms; directly related to the development; and fairly</p>	

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									and reasonably related in scale and kind to the development. The Council would not therefore be able to use obligations to improve the energy efficiency of existing properties. In order to retrofit these technologies the permission of the landowner would also need to be secured.	
Mrs/Dr Bryony Holroyd				DLPSA24	Table SDO1.1		Object	<p>Extensive comment on the assessment of Strategic Development Option 1. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p> <p>Some of the "Pros" in this table, particularly re. points 2 and 3 are worded very strangely and illogically, talking of "greater access to..." - this is for housing that does not yet exist. Currently it seems that many of the supposed "Pro's" are spurious and should therefore be revisited.</p> <p>As this site is on the urban boundary of Darlington it is far from the town centre and not well served by public transport, and is too far to walk into the town centre, though it may be cyclable. I would dispute the assessment that this site has "Greater potential for access by public transport, walking, cycling".</p> <p>Under point 14, I disagree that "Development on the edge of the settlement has potential to improve accessible green infrastructure to all residents."</p>	<p>The assessments in Appendix E consider how each potential strategic development location would be likely to affect the Sustainability Appraisal Objectives were they to experience development over the plan period. The assessments are written from this perspective.</p> <p>The scale of development possible in this location, combined with the existing local employment opportunities, access to existing facilities in the area and the potential to provide new facilities and supporting infrastructure mean that this location should be well served by the services and facilities needed to support new development locally, including new/extended public transport services.</p> <p>Development on the edge of settlements provides</p>	<p>The second to last bullet point in the 'Conclusions' section of Table SDO1.1 has been amended to read: 'Extension of public transport services, <u>walking and cycling routes</u> into site.' Make similar changes to bullet points in other strategic development option assessment tables as appropriate.</p>

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								<p>Point 15, I would see the extension of the existing urban area as a Con, not a Pro, given this involves less efficient land use than infilling existing brownfield sites within the town.</p> <p>In the summary of what mitigation measures would be required, extension of public transport services into the site should be expanded to read "extension of public transport, walking and cycling routes into the site".</p>	<p>opportunities to enhance countryside access for existing and new residents through improvements to cycleways and footpaths and through the provision of new on-site green infrastructure. It is however recognised that, depending on the scale and location of development involved, the distance existing residents have to travel to reach open countryside may increase.</p> <p>Final point agreed.</p>	
Mrs/Dr Bryony Holroyd				DLPSA25	Table SDO2.1		Object	<p>Extensive comment on the assessment of Strategic Development Option 2. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p> <p>The same confusing language is used again of "greater access to....": for whom and in comparison to what?</p> <p>There are significant issues with this site: major impact on the transport network, potential worsening of flooding and surface water flooding, significant landscape and nature impacts on the Ketton countryside, the beautiful Skerne valley and the cherished Skerningham community woodland in this rural area - as such this site should not be recommended for development.</p> <p>It also purports to support the improvement of transport infrastructure - if that is a euphemism for helping to pay for a northern</p>	<p>The assessments in Appendix E consider how each potential strategic development location would be likely to affect the Sustainability Appraisal Objectives were they to experience development over the plan period. The assessments are written from this perspective.</p> <p>Please see officer response on the Skerningham Strategic Allocation.</p> <p>The lack of North bound slip roads at junction 57 of the A1(M) means it is not a viable option to stop HGV's from using the A1150, and until a new alternative is provided, the A1150 will continue to be the main route used for traffic</p>	No change recommended.

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								link road then I also oppose this as unnecessary. More effective would be to designate Salters Lane / Whinfield Road and North Road an HGV-free zone, with suitable enforcement.	moving between South Durham and Teesside.	
Chris McGough	Director McGough Planning Consultants Limited			DLPSA27	Table Site 22E		Object	<p>It is not possible to be certain if these assessments relate to just the vacant land to the north of Hansteen's site or the combined sites, as the red boundary of 22 suggests.</p> <p>The LPA granted planning permission in 2015 for an Asda super-store and PFS on this site after accepting that employment development was not financially viable - due to the cost of remediating contaminants from its former industrial use. In the committee report, Officers noted: “(we) do not dispute the evidence submitted and consider that the site, which has been vacant for nine years, is likely to remain vacant unless it is released for an alternative use”.</p> <p>Paragraph 22 of the NPPF affirms that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.</p> <p>The viability concerns affecting Hansteen's land have not changed in the three years since the Asda permission was approved. Employment development is still not viable. In addition, a planning application for another retail development involving Lidl, Home Bargains and a Starbucks drive-thru on half the site has recently been submitted. This proposal was the subject of a pre-application submission and in an email dated</p>	<p>Site 22 covers the Hansteen's site and the vacant land to the north.</p> <p>The assessment of potential development sites in the Sustainability Appraisal does not take into account the viability of development, only their relative social, economic and environmental sustainability. However, the assessment has been amended to better reflect the known contamination issues on this site.</p>	<p>The commentary under Sustainability Objective 9, and in the Overall Predicted Effect/Potential Mitigation sections of site assessment tables for Site 22: Land off Faverdale West (Tables 22H and 22E) has been amended to reflect the known contamination issues on this site and the requirement for remediation.</p>

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								<p>18 October 2017, Officers summarised their position on the retail element of the proposal by stating, " I have checked with our Policy Team, and they confirm that the principle of retail on this site is agreed..".</p> <p>None of this is reflected in the assessment. Without this, it is unsurprising the assessment concludes continued employment if fine; however, with this information, it would be unreasonable for the assessment to conclude as it does. The assessment should be updated to include the information on our client's land's planning history and viability concerns.</p>		
S Jobe				DLPSA26		Middleton St George	Support	<p>Extensive response concerning the suitability of Site 90: West of St Georges Gate, MSG for inclusion as an allocation in Local Plan. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p>	<p>Comments noted. A number of minor amendments have been made to the assessment for this site to reflect comments made, but these changes do not change the scoring or overall predicted effect of this site in the Sustainability Appraisal.</p> <p>All sites will be expected to take a sustainable approach to water management and use sustainable drainage systems (SUDs) where appropriate.</p> <p>The potential for a minimal increase in traffic through the centre of the village resulting from this site is picked up under Sustainability Objective 7.</p>	<p>The following changes to the assessment for Site 90: West of St Georges Gate, MSG have been made:</p> <ul style="list-style-type: none"> • Add a reference under Sustainability Objectives 3 and 7 to the proximity of the site to National Cycle Network route 14 (make similar changes to

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									The commentary under Sustainability Objective 15 recognises that whilst development of the site would extend the form of the village, the site is fairly self-contained.	the assessments for other sites along this route). <ul style="list-style-type: none"> Amend the first bullet point under the 'Potential Mitigation' section of the table to read: 'Retain and enhance the area of woodland on the eastern side of the site adjacent to the beck.'
S Jobe				DLPSA30	Table Site 90		Neutral	<p>Extensive response providing additional information regarding the viability and deliverability of Site 90: West of St Georges Gate, MSG. A full copy of which can be viewed on the Council Planning Policy Consultation Portal at http://darlington.objective.co.uk/portal</p> <p>It is requested that the development limits of Middleton St George be amended to include Site 90 within the new Local Plan and the site is further considered for housing allocation.</p>	<p>Comment noted. The points made in the comment are picked up by the Council's assessment of the site in the Sustainability Appraisal and reflected in the scoring for the site.</p> <p>Sufficient land has been identified in Middleton St George to meet local housing needs that is considered to score equally or better than site 90 against the sustainability objectives and which would</p>	No change recommended.

Full Name	Organisation	Agent	Organisation	ID	Number	Title	Nature of response	Officer's summary	Officer's response	Action / Change Recommended
								This site was assessed and accepted as being suitable, available and achievable for 109 housing units over the next 6 to 10 years in the recent DBC HELAA process.	<p>create more logical extensions to the villages built form, being closer to the village centre, and/or of sufficient size to provide a mix of uses including new community facilities to serve the village.</p> <p>The HELAA is a technical study that determines the suitability, availability and achievability of potential development sites across the borough, it does not consider the relative sustainability of site options.</p>	
Mrs/Dr Bryony Holroyd				DLPSA16	Table TC 1		Support	Support all aspects dealt with here	Support noted.	No change recommended.