
**LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY REVISED PREFERRED OPTIONS:
CONSULTATION RESPONSES AND NEXT STEPS**

SUMMARY REPORT

Purpose of the Report

1. This report is to consider consultations carried out on the Local Development Framework Core Strategy: Revised Preferred Options (CSRPO), and the comments that have been made in response to it. It also outlines key actions and the next steps in preparing the Core Strategy so that it can be submitted to the Government for independent inspection in the autumn.

Summary

2. As part of preparing the LDF Core Strategy, consultations were carried out on Revised Preferred Options from 20th January to 28th February 2010 inclusive. A total of 66 organisations and individuals responded in writing to the consultation, amounting to over 400 comments, and further comments were received from people who attended the six consultation events and meetings. The consultation was widely publicised in the local media and through direct mailing and e-mailing, and responses were received from government bodies, landowner/developer interests, local interest groups and members of the public.
3. Consultation responses covered the whole range of planning issues. A key consultee, the Government Office for the North East congratulates the Council on the considerable progress it has made with the draft Core Strategy, whilst the North East Planning Body confirms that it is in general conformity with the Regional Spatial Strategy (RSS). Landowners, developers and local business interests have taken the opportunity to promote their sites for development or to suggest changes to the plan that would cement or improve their current stake in the Borough. The renewable energy policy attracted a significant body of local adverse opinion, particularly as it relates to wind farms. Some frequently-aired issues, such as the need for a bus station, continue to generate responses to any consultation.
4. Specific actions are proposed, including some limited additional evidence collection, to finalise the policies for the LDF Core Strategy, taking into account these consultation responses. The report highlights where any significant policy changes are likely.

Recommendations

5. It is recommended that:
 - (a) Members note the representations and other comments received;
 - (b) Members consider and comment on the key actions, likely areas of significant policy changes and next steps indicated in the report, so that progress can continue to be made on advancing

Core Strategy preparation in accordance with the published timetable;

- (c) the Chair and Vice Chair be kept informed of the findings of any outstanding technical studies that will inform finalising Core Strategy policies.

Richard Alty
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Background Papers

Darlington LDF Core Strategy: Revised Preferred Options, January 2010

Darlington LDF Core Strategy Revised Preferred Options: Schedule of Consultation Responses, April 2010

Valerie Adams : Extension 2477

S17 Crime and Disorder	The revised draft design policy (CS2) includes safety and security in the criteria for new developments.
Health and Well Being	Revised draft policies on green infrastructure (CS17), promoting quality, accessible sport and recreation facilities (CS18), meeting housing needs (CS11) and existing housing (CS12), together with a revised draft policy (CS19) that includes supporting improvements to travel on foot and by bike, will all contribute to better health and well being of residents of Darlington.
Sustainability	The Core Strategy: Revised Preferred Options has been subject to sustainability appraisal and this has informed policy development.
Diversity	An equalities impact assessment and a disability equalities impact assessment have been carried out on the Core Strategy Revised Preferred Options.
Wards Affected	All
Groups Affected	All
Budget and Policy Framework	Work on the Core Strategy is being carried out within the budget allocated to the service.
Key Decision	No
Urgent Decision	No
One Darlington: Perfectly Placed	The Core Strategy is the principal document of the Local Development Framework (LDF). The LDF is the spatial embodiment of the sustainable community strategy.
Efficiency	As far as possible, the method of consultation and the consultation materials used have been electronic rather than paper, where people are happy to receive information in this way, significantly reducing printing and postage costs and the use of finite resources. Consultants are only being used for specific technical work, where specialist expertise is not available in house, e.g. economic viability of housing land study and retail study update.

MAIN REPORT

Information and Analysis

6. The Core Strategy will be the principal document in the Local Development Framework, which will replace the adopted Borough of Darlington Local Plan. It will include a spatial strategy setting out broad locations for delivering housing and employment as well as other strategic development such as retail, public services and transport development. It also includes policies aimed at protecting and enhancing the Borough's natural and built environment.
7. The Core Strategy will set out the land use planning and spatial elements of One Darlington: Perfectly Placed and the Climate Change Strategy. It also reflects other Council strategies that have implications for the development and use of land, including the Local Transport Plan, the Darlington Gateway Strategy and the Open Spaces Strategy. The Core Strategy will also implement the policies and reflect the priorities of the Regional Spatial Strategy and those of other regional and sub regional strategies and programmes, such as the Tees Valley's Housing Growth Point programme of delivery.
8. At the Cabinet Meeting on 5th January 2010 (Minute C113(2)(b)), it was agreed that the Core Strategy: Revised Preferred Options (CSRPO) be the basis for carrying out public and other consultations, in line with regulatory requirements and the Council's adopted Statement of Community Involvement.

Main provisions of the Core Strategy: Revised Preferred Options

9. The CSRPO sets out a spatial vision for Darlington for the year 2026, followed by eight strategic objectives and 19 revised draft policies. These are arranged, where possible, according to the themes set out in 'One Darlington: Perfectly Placed', to emphasize the strong links between the two documents. The overarching theme of 'achieving a more sustainable community' sets out four key policies, namely the locational strategy for Darlington, promoting good quality, sustainable design, promoting renewable energy and developer contributions.
10. Publication of the CSRPO marked a significant advance in plan preparation from the Core Strategy: Preferred Options, on which consultations took place in autumn 2008. As a result of feedback received at that time, several additional technical studies were undertaken to underpin the preparation of revised draft policies, e.g. the Darlington Strategic Housing Land Availability Assessment, a playing pitch strategy and the Darlington Connections Study. The findings of these studies were reported to a Special Economy and Environment Scrutiny Meeting on 22nd October 2009 (Min EE33 refers). As with the Preferred Options, consultees could comment on the precise wording of proposed policies, and could clearly see if and how the Council proposed to tackle the issues that interested them in the Core Strategy. The CSRPO also contained information on what had been taken into account in preparing the draft policies, including earlier consultation responses, the findings of technical studies commissioned or undertaken by the Council, and the requirements of the national and regional planning policy framework. A draft Local Infrastructure Plan was also published alongside the CSRPO, to provide more detailed information on the deliverability of the infrastructure required to support new development to achieve sustainable forms of development.

Community and Stakeholder Consultation Undertaken

11. In accordance with the Council's Statement of Community Involvement and to meet regulatory requirements regarding public participation in the preparation of a development plan document, public and other consultations were carried out on the CSRPO between 20th January and 28th February 2010 inclusive. The programme of events and activities involving the public and other interested groups included:
 - (a) Members' briefing prior to the start of consultations – 11 attended;
 - (b) drop-in and structured 'Talking Together' events at Central Hall (10 attended), the YMCA (11 attended), Alderman Leach School (13 attended) and St. Andrew's Church Hall, Haughton (15 attended);
 - (c) presentations to meetings of the Town Centre Traders Association, Darlington Association of Parish Councils, and the Greener and Prosperous Darlington Theme Groups of Darlington Partnership;
 - (d) housebuilder/developer stakeholder event held at the Darlington Arena – 20 attended;
 - (e) Darlington Planning Forum – 8 attended.
12. Items about the consultation and the planning issues it covered were carried in The Northern Echo, and the February edition of the Town Crier carried a double page spread publicising the consultation. The consultation was also advertised in some Councillors' newsletters and in the libraries. The documents and comments forms were also available at all the libraries and at the Town Hall.
13. In addition to the above, over 900 interested organisations, agencies and others were contacted by letter or e-mail to notify them about the consultation, and to provide them with information about the Core Strategy: Revised Preferred Options, and the accompanying sustainability appraisal (SA) and Habitats Regulations Assessment (HRA). Published information included the document itself (as paper copy and CD-rom), an introductory leaflet, the SA and a non-technical summary of the SA and the HRA. All these documents, together with the background technical studies and the opportunity to reply to the consultation on-line, were available on a dedicated page about the Core Strategy on the Council's website.

Outcome of Consultation

14. Written responses were received from 66 organisations and individuals during the consultation period, amounting to over 400 separate comments. 66% of written responses were received electronically (about 5% up on the previous consultation), and of these, six were submitted using the on-line reply facility. The majority of responses were received from statutory organisations, planning consultants and other landowner interests and local interest groups. 21 members of the general public made written responses, up from 14 during the last Core Strategy consultation, and these were complemented by feedback given directly to officers at local consultation events.
15. Whilst consultation of this type tends to attract a variety of views and questions about the Council's approach, a number of positive comments have also been received. The Government Office congratulated the Council on the considerable progress it has made with

the draft Core Strategy. The CPRE committee welcomed the embedding of environmental issues and policies throughout the document, English Heritage welcomed the recognition of Darlington as a market town of significant cultural value, and Sport England supported the recognition of the role that accessible sport and recreation facilities can have in tackling gaps in health and well being in the borough and reducing obesity. One local resident commented 'I wish more people could read these documents. This is readable and logical and so full of information, fascinating to anyone interested in their community'.

16. A strong response was expected from developers and landowners at this stage, as these interests seek to ensure that the emerging policies and strategy favour their land or business interests. Where policies tackled issues of specific local concern, a stronger public response was received, e.g. from the residents and their representatives of the north-eastern corner of the Borough regarding the renewable energy policy, particularly as it related to wind turbines (see paragraphs 44 - 45 below).
17. A detailed schedule of all the written comments received, officer responses, and proposed changes has been produced. It is arranged so that all the comments made on one policy, issue or theme are grouped together, and is available to view on the Council's website at www.darlington.gov.uk/planningpolicy, or is available in paper form in Members' rooms and in Room 401 at the Town Hall. Comments made at public events are also similarly recorded. Because of the range of issues on which comments were made, only a selection can be covered within this report.
18. Because of the timing of the consultation, various respondents questioned the priorities and ambitions of the plan, in the context of the current recession. Others also felt that the policies were too loose and undeveloped. Whilst it is acknowledged that further work is needed on some policies, the nature of the Core Strategy is that the policies are not over detailed; detailed matters like defining limits to development and allocating sites for new development will be done in subsequent development plan documents. Regarding the economic downturn, the likely ongoing effect of this over the first few years of the Strategy period on sectors such as retailing has only recently become apparent and parts of the draft Strategy (eg quantitative retail forecasts) will need to be updated before proceeding to publication of the final version. As regards housing delivery, the Strategy has made assumptions about future housing delivery based on evidence of forecast building activity provided by developers and housebuilders in response to a questionnaire in Spring 2009. This evidence will be updated again with prior to finalising the strategy for publication.

Consultation Responses on Specific Issues

Sub-Regional Role and Locational Strategy (CSI)

19. A number of comments were received around this draft policy. Minor changes are suggested by the North East Planning Body, in relation to the adoption of a sequential approach to development. The Yorkshire and Humber Regional Assembly, requests that the policy acknowledges the strong links between the 'vales and Tees Link' sub area of Yorkshire and Humberside and the North East region. Both changes can be readily accommodated.
20. Some respondents have questioned the deliverability of the amounts of development in the strategic locations identified. Work underway on a Transport Area Action Plan (TAAP) for each of the strategic locations will establish if there are deliverable and affordable transport solutions to address the traffic issues that these amounts of developments will give rise to. Updated flood risk assessment information will require further consideration as to whether

the full amount of housing envisaged in the Town Centre Fringe could still be accommodated there. Northumbrian Water (NWL) has indicated that it cannot give full support to the locational strategy until further work is done to assess the implications of the growth proposed that is beyond the capacity of the improvement works being completed this year at Stressholme Sewage Treatment Works.

Key Actions

21. Await findings of Transport Area Action Plans to inform final policy position on strategic locations.
22. Consider implications of updated strategic flood risk assessment work for delivery of new housing in the Town Centre Fringe strategic location.
23. Officers are due to meet with NWL to discuss this and a verbal update can be provided at the meeting.

Housing Numbers (CS10)

24. There was general support for the overall housing requirement figures to 2026. To ensure that Policy CS10 is based on the most up to date information available, the amount of new housing required will be recalculated, taking into account planning permissions granted in the period 1st April 2009 to 31st March 2010, and any new intelligence or information about the deliverability of particular sites or level of housing market activity in the short to medium term in general. This may slightly affect the amount of new housing that will be required in each of the strategic locations currently identified in draft revised CS10.

Key Action

25. Update the housing trajectory (a year by year forecast of future housing completions) using data to March 2010, to ensure the most up to date information underpins final conclusion on how much new housing is required, where and when.

Proposed New Housing Development (CS10)

26. Some respondents have questioned the deliverability of 750 dwellings in the Town Centre Fringe area. Although there are no firm plans yet for what land uses will be going where (this will emerge through consultations over the next year or so on the town centre fringe in general and on the Town Centre Fringe Action Area Plan in particular), the figure and phasing is based on a notional area within the Town Centre Fringe which could accommodate new housing, taking account of constraints such as flood risk and the hazard posed by the gasholder in Valley Street, appropriate development densities for such a deeply urban area and the type of new housing that is needed in Darlington. More detail on this was given at paras. 3.13 – 3.15 of the Housing Implementation Strategy at Appendix 7 of the CSRPO.
27. Some developers have asked how policy CS10 would ensure continuing housing delivery, particularly if development does not come forward as planned in one or more of the strategic locations. They have highlighted the relatively long lead-in time required to bring forward a new strategic location, and that for the policy to be more immediately flexible, some smaller sites may be needed to ensure continuous supply of housing land if one of the strategic locations does not come forward as envisaged.

28. Whilst the Housing Implementation Strategy, which appeared at Appendix 7 of the CSRPO provides some detail on this, additional wording in the policy and reasoned justification may be required to highlight and strengthen this link, and to set out the policy approach to maintaining housing supply in such circumstances.
29. During the consultation period, it has been identified that to ultimately achieve a sustainable community at the Eastern Urban Fringe, significantly more new housing than is identified in the Core Strategy would need to take place in this location beyond 2026. The idea of identifying this as a reserve area for, say, an additional 600 dwellings beyond 2026 is currently being investigated; without this or some similar commitment to give certainty to investors/developers, it may be difficult to secure the necessary physical, social and green infrastructure at the outset to achieve a sustainable form of development. A similar approach is also being considered for the North West Urban Fringe area, where 800-900 additional dwelling (200+ more than currently proposed) are needed to support a new primary school.
30. Representations from Manners Family Trust and Manners Farms Ltd argue that, based on the criteria used to inform the choice of strategic locations, land at the western urban fringe would be more suitable as a strategic location for new housing development than the North West and Eastern Urban Fringes identified in the CSRPO. However, the only new substantiated information provided by their consultants that was not considered in the Council's original strategic locations options appraisal is the potential of the area to be developed with its own renewable energy supply, as the area is in an 'area of least constraint' for wind energy development and agricultural land nearby is also in the ownership of Manners, and could be utilised for biomass crops to fuel a biomass power plant associated with new residential development. Whilst positive, taking alongside the other 14 factors, it is not considered significant enough to alter the conclusions of the option appraisal.
31. Some landowners and developers have requested that land that they have an interest in be allocated as housing land or identified as a strategic location for new housing. These include Land at Elm Tree Farm, north of Haughton and south of the golf course, and land at Cleveland Street in the Albert Hill area. It is not the role of the Core Strategy to identify specific sites for new housing, only general locations, and the approximate proportions of the overall housing required that will be provided in each general location. These sites will be assessed as part of the next Strategic Housing Land Availability Assessment (SHLAA) update. This is the evidence that will underpin the identification of potential housing sites in the forthcoming Accommodating Growth DPD.

Key Actions

32. Amend CS10 to ensure policy is flexible enough to continue to deliver housing land if housing in the key locations identified does not come forward as anticipated.
33. Revisit Strategic Locations in light of consultation responses and findings of Transport Action Area Plans.

Meeting Housing Needs, including Affordable Housing (CS11)

34. Consultees have indicated that targets for affordable housing for the whole of the plan period are needed and that they need to be subject to economic viability tests.

35. Since the Revised Preferred Options consultation, specialist consultants, Levvel Ltd., were commissioned to report on the economic viability of housing land. This work tested what levels of affordable housing it will be viable for the Council to require in a range of locations, sizes and types of sites, under different housing market scenarios, taking into account other likely planning obligations such as for open space, school places, etc. The work also establishes whether the proposed targets for affordable housing were viable or not, and puts in place robust and up to date evidence to support the targets that will appear in the pre-submission publication version of the Core Strategy. A summary of the key findings of that study and its implications will be verbally reported to the Committee at this meeting. This may result in amendments to Core Strategy draft Policy CS11.

Key Action

36. Amend plan to include targets for affordable housing for the whole plan period
37. Revisit affordable housing targets in light of Economic Viability of Housing Land Study

Land for Employment Uses (CS5)

38. The owners of the Cleveland Street employment site have indicated support for the general thrust of employment policy, however they have questioned the inclusion of this existing employment site in the employment land portfolio as they no longer consider the site viable for employment use.
39. It is not the role of the Core Strategy to identify specific sites, only general locations. The Darlington Employment Land Review 2009 has been carried out since the last Preferred Options consultation, and has, alongside the King Sturge Employment Land Study of 2006, informed the development of policy. This identifies the site as an existing employment site and part of the employment land portfolio, however the policy is considered to provide the flexibility to consider the suitability and viability and the role of existing employment sites in contributing to the overall need for additional employment land over the plan period, and these issues will be addressed in more detail in the forthcoming Accommodating Growth Development Plan Document.
40. Concerns were raised from one resident and from the CPRE, regarding the retention of the Faverdale Key Employment site in the strategy. Faverdale is a Key Employment Location identified in the Regional Spatial Strategy as a prime site for distribution and logistics operations that could contribute to regional economic growth. The Core Strategy reflects the RSS and therefore no changes are proposed to policy CS5 as a result of these objections.
41. Objections have been received from Government Office for the North East and the North East Planning Body regarding the lack of indication of when employment development is going to happen and by what means it will be delivered, as advocated by RSS Policy 5. Although the decision not to include a phasing element to the policy was taken due to local circumstances and the nature of Darlington's employment land portfolio, this issue will be given further consideration.

Key action

42. Give further consideration to the issue of phasing of employment sites and ensure policy is consistent with the national advice in PPS4.

Cultural and Tourism Offer (CS6)

43. A number of responses questioned the theme and the sustainability of the strategic tourism opportunity at the A68/A1 (M) Junction. As this is a strategic document, it does not go into the detail of identifying a type of tourist attraction. This would be addressed in other more detail planning documents, or through specific proposals. The necessary infrastructure and transport facilities would need to be in place to ensure that the development was accessible by a choice of means of transport and not simply a car borne destination. Further consultation on the issue will be required with the Highways Agency.

Renewable Energy (CS3)

44. Several respondents felt that the broad areas of least constraint for wind energy identified in draft Policy CS3: Promoting Renewable Energy did not cover the right parts of the Borough. However support was received for an area of search to the west of the urban area, providing a potential opportunity for future development at the north west fringe strategic location to be brought forward alongside renewable energy provision. There was specific opposition to the policy from parishes and local residents in the north-east part of the Borough (including Sadberge Parish Council, Seven Parishes Action Group (SPAG) and the CPRE) where a planning application for a wind farm has been submitted and a number of wind farm proposals are currently being proposed by developers. Cumulative impact on landscape and quality of life of residents were cited as issues, with SPAG and Sadberge Parish Council proposing the inclusion of all the recommendations of the ARUP Wind Farm Development and Landscape Capacity Study: East Durham Limestone and Tees Plain, particularly in relation to separation distances between wind farm developments. Natural England considers that the draft policy will not sufficiently protect biodiversity and geological interests.
45. The north eastern part of the Borough was subject to an assessment carried out to underpin policy development in the RSS for wind farm development. However the same detailed information was not available for the rest of the Borough. The Council commissioned a further assessment covering the whole Borough which also include an assessment of the potential of a wide range of renewable energy technologies and not just wind energy. Specific comments have been made on this Decentralised and Renewable or Low Carbon Energy study, particularly in relation to its links to the ARUP report and the approach used to identify the three potential areas of search. Clarification is being sought from the consultants who carried out the Borough wide study on these issues, and this clarification will inform finalising policy CS3. However, finalising the policy will also have regard to the comments of One North East that the draft policy recognises the potential for various forms of renewable energy generation across the Borough and will contribute to achieving national targets of ensuring 15% of energy is gained from renewable sources by 2020. This is reinforced by the North East Planning Body who consider that draft CS3 is in conformity with the RSS, promoting the development of renewable energy schemes, whilst taking into account wider environmental, social and economic impacts, as well as identifying potential locations for commercial scale renewable energy developments.

Key Action

46. To seek clarification on the findings of the renewable energy study and to give consideration to the need for further evidence to underpin the renewable energy policy.

Improving Transport Infrastructure and Creating a Sustainable Transport Network (CS19)

47. A variety of comments were received on this draft policy. One North East supported the policy as it builds on initiatives like the sustainable travel town, and the Highways Agency gives strong support for all aspects of the policy. The Government Office require changes to reflect the parking policy in government planning policy statement PPS13.
48. There was some support for the decision not to include the Cross Town Route in the policy, though some residents in the West Park area felt that the scheme would be the only way to improve journey times across the town and reduce congestion in the West Park area. Residents still raise the issue of a bus station at consultations of this type, but it would be for proposals to be drawn up in other plans and strategies before it could be included as a deliverable scheme in the Core Strategy. One resident also suggested that a rail freight terminal should be included in the plan but again, without any indication of interest or a deliverable scheme, it would be inappropriate to include it in the Core Strategy.

Key Action

49. Address comments on parking either in policy CS19 or CS2.

Consultation Responses from Specific Groups

50. Whilst responses from all types of interested parties were received on most of the issues, there were some aspects of the document that were of more interest to specific groups than others, and these are summarised in the next sections of this report.

Statutory Consultees and Government Agencies

51. In contrast to the Preferred Options consultation when the Government Office (GO-NE) made substantial objections to the document and most of the draft policies, this time the response from GO-NE congratulates the Council on the considerable progress it has made with the draft Core Strategy in achieving this key stage, and they are impressed with the quality of the content and the open and accessible style of presentation. The more detailed comments made by GO-NE relate to the need to take into account the new PPS4 (published after the CSRPO was finalised for Cabinet), the need for additional information on phasing of employment land release, an overall affordable housing target, the need for the sport and recreation facilities policy (CS18) to address the shortfall in provision of junior football pitches, and the need for the transport (CS19) or design policy (CS2) to include guidance about parking as part of a package of measures to promote sustainable travel choices. There will be continued liaison with GO-NE as we advance to submitting the Core Strategy for examination.
52. The North East Planning Body consider that the CSRPO is in general conformity with the RSS, but ask that the sequential approach to development is more explicitly stated, and that there is a phased approach to the release of employment land. They would welcome definition of the circumstances where lower density housing is needed, and would welcome the inclusion of Sustainable Urban Drainage Systems as a requirement of new development. They also ask that demand management measures and parking standards be included to reduce car travel.
53. Other key statutory consultee and government agency responses were as follows:
 - (a) One North East generally indicates that the draft policies support the delivery of the Regional Economic Strategy. However, it suggests that the document should recognise and allow for increasing demand for small renewable energy schemes in housing and

business premises, and enable developer contributions to be collected to implement this. In a similar vein, it considers that there should be references to sustainable travel plans and that these should consider the deployment of strategically positioned charging points and wider electric vehicle infrastructure linked to key public amenities, and supports the inclusion of energy efficiency as a key area for improvement in the existing housing stock. . Regarding the strategic tourism opportunity, it comments that the sequential approach to site selection should be applied to identifying a location;

- (b) English Heritage, in contrast to the Preferred Options consultation, are broadly supportive of the approach to the historic environment, particularly in CS14 but suggest that the historic environment should have a more cross cutting role in the Core Strategy as a tool to attract investment to the town
- (c) Natural England supports the inclusion of draft policies CS14, CS15 and CS17 but are concerned that CS15 lacks achievable targets for priority habitats and species. They would also encourage CS17 to more fully reflect the emerging national green infrastructure agenda which embraces the different functions that the green infrastructure network can have, including natural and worked landscapes and not just those for community recreation.
- (d) The Environment Agency's main concern is that a flood risk sequential test assessment has not been undertaken for the strategic locations. A Strategic Flood Risk Assessment (SFRA) is being undertaken for the Borough; this has informed the identification of locations to date, resulting in all of the locations, with the exception of the Town Centre Fringe being located outside of areas at flood risk. Further work is being undertaken by JBA Consultants with the Environment Agency to help determine the strategic approach to flood risk management to help ensure that future development of the Town Centre Fringe creates a safe, high quality environment for all.
- (e) The Highways Agency have indicated that they welcome the changes that have been made in response to their objections. Their key outstanding issue is the traffic impact of the proposed development in the strategic locations identified and its impact on the strategic highways network.
- (f) Sport England welcome the importance placed upon promoting quality, accessible sport and recreation facilities within the Core Strategy. But they consider it would be beneficial to incorporate standards of provision for playing pitches and sport and recreation facilities in policy CS18 to ensure the appropriate quantity of provision can be met and monitored.
- (g) County Durham and Darlington NHS Trust consider that the Core Strategy does not appropriately address the matter of healthcare provision and delivery cover within the Borough of Darlington despite this being a key objective of One Darlington Perfectly Placed. It would like the Core Strategy to incorporate maximum flexibility in its strategy, spatial vision, policies and proposals to ensure future healthcare related development and redevelopment and proposals are not prejudiced, so that high quality healthcare services are provided to the Borough of Darlington and its strategic targets can be met.

Key Actions

- 54. Several of the comments made by One North East and the regional planning body can be addressed in the more detailed LDF documents planned, where detailed development

policies and site allocations will be set out, or are addressed in existing documents, such as the Design of New Development Supplementary Planning Document.

55. Officers are now providing the Highways Agency with more detailed future forecast development data for the strategic locations and for the Borough overall, to enable them to model future traffic growth and assess what measures need to be put into place to mitigate any adverse traffic impact. Provided the mitigation measures identified can be included in the Core Strategy and/or the accompanying Local Infrastructure Plan, the Highways Agency is likely to withdraw any outstanding objections to the Core Strategy, and will be able to support the Council, if required, at the Public Examination.
56. Officers are working closely with the Environment Agency to agree an appropriate approach to the future development of the Town Centre Fringe to ensure that the risk of flooding to residents and users of the area is no worse than currently exists, and to determine what needs to be put in place to mitigate the risk of flooding in the long term. The mitigation measures will be included in the Local Infrastructure Plan and the an appropriate policy will be incorporated in the forthcoming Town Centre Fringe Area Action Plan to satisfy the Agency's concerns. The completion of the flood risk assessment will also allow the Core Strategy sequential test assessment to be undertaken, which following consultation with the Environment Agency, should enable them to support the Council's approach to new development in the Core Strategy.
57. The concerns of English Heritage, Natural England and Sport England will be addressed in policy revisions and with subsequent consultation with these external partners to ensure that the revised policies are robust and credible.
58. Further consideration needs to be given to the objection of County Durham and Darlington NHS Trust to see if it can be addressed without undermining the overall purpose of the Core Strategy.

Landowners and Developers

59. Most landowner and developer responses were either to promote particular sites for development or to ensure that sites were safeguarded from alternative forms of development (see land for employment uses and proposed new housing development sections above). However, some other matters that these respondents expressed views on were as follows:
 - (a) Developer contributions: the plan should be clear about what strategic infrastructure is and how any monies collected for this from developers are fairly and reasonably related to proposed developments. The Council should consider the cumulative effects of Section 106/development costs on scheme viability.
 - (b) Design of new development: some felt that the draft policy CS2 is too onerous, particularly in relation to sustainable construction standards proposed, which will affect the commercial viability of schemes.

Key Actions

60. Work is underway to prepare an economic viability of housing land study. This will inform finalising the 'developer contributions' policy and the forthcoming Planning Obligations SPD. Further detail on the Council's approach to securing planning obligations from new development and the impact on scheme viability will be set out in the draft SPD which will be available for consultation in Autumn 2010.

61. Sustainable building standards in CS2 are consistent with the Government's national programme and are in conformity with the RSS. It would be the responsibility of a developer to show that provision of standards in a new development would impact on the viability of a scheme through negotiation during the planning application process.

Existing Business Interests in the Borough

62. Comments from significant business interests in the Borough (in addition to those mentioned in previous sections) include:
 - (a) Town centre development and retail policies: the Moorfield Group (owner of the Cornmill Centre) question the priority given to development at Commercial Street over other "potential sites" for retail development in the town centre, one of which they are "currently preparing a scheme" for. Sainsbury's want their Victoria Road store to be included within the boundary of the town centre. Tesco say there is a clear qualitative need for a town centre foodstore, want further retail provision allocated in the North West part of the Borough - and ask that West Park be designated a district, not local, centre - want convenience retailing to be considered within the mix of uses at Valley Street, Blakett Road, Lingfield and Morton Park. DSG International (owners of Curry's) ask for more recognition of the benefit of facilities such as Darlington Retail Park. Nottinghamshire CC Pension Fund (owners of the No Frills DIY unit) make similar comments regarding their facility and want it to be included within the boundary of North Road district centre. A number of respondents pointed out that the Core Strategy needs to take into account the recently-published Planning Policy Statement 4 (PPS4).
 - (b) DTVA want the plan to be clearer about the amount of land available for development at the airport in Darlington Borough, and for it to highlight further the role of the airport and its expansion in driving regional economic growth;

Key Actions

63. Finalising the town centre and retail policies in the Core Strategy will be informed by taking into account the policies of PPS4 and an update of the quantitative forecasts of the 2008 Darlington Retail Study to reflect the economic downturn that has severely affected retailing since the Study was published; the latter work will be carried out over the next few weeks. Other substantive changes to these policies are not considered appropriate.
64. Further consideration is needed as to whether more can be said in the Core Strategy to indicate the Council's commitment to supporting the airport, given its importance to the local economy.

Local People, Interest Groups and Parish Councils

65. The comments made by local people, interest groups and Parish Councils ranged across all planning policy themes, and beyond in some instances. The CPRE has been impressed by the embedding of environmental issues and policies throughout the document and welcomed the 'very good', 'thorough analysis' for particular sections.
66. At the public events, some of the key issues raised were:

- (a) Traffic congestion in the West Park area, that will only be made worse by the planned developments. Also traffic congestion at Salters Lane North and Whinfield Road;
- (b) A green corridor should be created for the River Skerne as it passes through the town;
- (c) More needs to be done to improve poor housing stock in the town, particularly those that are privately rented or in multiple occupation in wards like Northgate, and more should be made of existing older housing before it is considered for demolition;
- (d) A call for the Council to do more to support the airport, which is vital to support a thriving local economy;
- (e) Concern about the type of new development that would be permitted in the Faverdale area;
- (f) Agreement about the opportunities presented by the town fringe area, with suggestions about the range of facilities and uses that could be accommodated there;
- (g) Need for better links from the town centre fringe to the town centre.

Key Actions

- 67. Comments beyond the scope of planning policy or the Core Strategy have been shared with colleagues within the Council, e.g. in housing or transport policy, to be addressed appropriately. Where possible unfounded concerns about future development were allayed at the consultation events themselves. The further work on Transport Area Action Plans referred to earlier in this report will identify the actions needed to mitigate congestion where new development is proposed.
- 68. Comments relating to more detailed planning policy matters will be held for consideration in preparing the forthcoming more detailed LDF documents, such as the Accommodating Growth DPD.

Sustainability Appraisal and Habitats Regulation Assessment

- 69. People also had the opportunity to comment on the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the Core Strategy: Preferred Options, both of which are statutory requirements. The SA looked at the social, economic and environmental effects of the strategic objectives, and draft policies, whilst the HRA assessed their impact on European designated nature sites (outside the Borough).
- 70. The Environment Agency had no specific comments to make regarding the SA report, and English Heritage is generally content with the way the SA has developed and deals with cultural heritage. Natural England commented that the key issues impacting on the natural environment identified in the SA should be drawn out in the introduction to the Core Strategy where the key issues are identified, to provide context to the spatial challenges. It also commented that there should be a brief explanation of the habitats regulations assessment in the Core Strategy, and how its findings have shaped the options. Consultants acting from the owners of land at the western urban fringe have commented that the SA is inaccurate in respect of its comparative assessment of strategic housing options, repeating the reasons they have cited in commenting on policies CS10 and CS1.

Key Action

- 71. The text of the publication version of the Core Strategy will be drafted to include stronger links between it and the findings of the SA and the HRA.

Equalities Impact Assessment and Disabilities Equalities Impact Assessment

72. A generic Equalities Impact Assessment and Disability Equalities Impact Assessment were carried out during the preparation of the Core Strategy Revised Preferred Options document, and published alongside it. Provisions that take account of the assessments include a clause in the 'Meeting Housing Needs' policy (CS11) to ensure that the mix of housing sought will include both housing for people with disabilities, and housing for older people, with the latter including housing capable of being readily adapted to meet a range of needs, and making references to 'accessibility for all' in several policies. The assessments also found that that equality is promoted by the strategy, including different treatment for travelling groups, to ensure that they are not disadvantaged by inadequate accommodation provision (revised draft policy CS13).
73. However, Darlington Association on Disability (DAD) feel that the Strategy does nothing to improve transport for disabled people, relying on it being addressed in the Local Transport Plan. DAD would like it to be an aim of the Core Strategy, so that how disabled people get around in the Borough would not get overlooked, and would be given the same priority as reducing congestion.
74. In fact, draft policy CS19 specifically states that: "Throughout the plan period ... the transport infrastructure for disabled people [will be] improved". This is reinforced by Policy CS2 which states that: "All development proposals should ... support inclusive communities, by providing links to existing networks to ensure safe, convenient and attractive access for ... disabled people". The LTP will carry these principles forward into more detailed transport policies and actions; this together with the above policies and the recently-adopted Design of New Development SPD provide the tools needed to safeguard appropriately the interests of disabled people.

Key Action

75. The approach of each policy will be reviewed by rerunning both assessments prior to finalising policies at the next stage in the Core Strategy preparation process, so that any adverse impacts are identified and addressed before the plan is published.

Local Infrastructure Plan

76. Alongside the consultation on the CSRPO, consultations were also carried out on a draft Local Infrastructure Plan (LIP). The draft LIP sets out new planned infrastructure and/or improvements over the next 15 years to help deliver the policies in the Core Strategy, with greater detail provided for the strategic locations. It also identifies who is likely to be funding and providing infrastructure works, and when. It encompasses physical infrastructure (such as roads, sewers, heritage), social and community infrastructure (such as education facilities and healthcare provision) and green infrastructure (such as open space and habitat provision).
77. The Government Office for the North East state that the draft LIP is 'thorough and informative' with adequate detail provided for the infrastructure provision for the strategic locations, although similar cross referencing to other Core Strategy policies would be beneficial. The Highways Agency and the Environment Agency have both indicated their support for the LIP, only highlighting the need to use the most up to date evidence. The Agencies, Network Rail and the County Durham and Darlington Foundation Trust have all provided further information to add clarity and detail to the draft Plan, which is welcomed.

Next Steps

78. Subject to this Committee's comments, the proposed key actions and a range of other actions will be undertaken to advance the preparation of the Core Strategy as quickly as possible. Particular attention will be paid to addressing the comments of the Government Office and other statutory consultees to ensure that when the plan is submitted for Examination, the Council has done everything it can to ensure that it will be found to be a sound plan.
79. Officers will also consider the findings of studies recently completed or due to be completed shortly. These include the Darlington Strategic Flood Risk Assessment Level 2, the update to the Council's adopted Open Spaces Strategy, the Economic Viability of Housing Land Study and an update of the Darlington Retail Study. It is anticipated that the above studies and plans will be completed during April and May 2010.
80. The next version of the Core Strategy that will be prepared will be the version that the Council wants to submit to the Government for public examination, and would be happy to adopt. This 'publication' document will be a thinner document than the Revised Preferred Options, as it does not need to contain the story about how policies were developed (the 'options considered and 'preparing a revised draft policy' sections in the Revised Preferred Options); it only needs to contain the policies and the reasoned justification, together with spatial vision, context and strategic objectives, and a key diagram. The 'publication' Core Strategy is timetabled to be considered by Cabinet and Council in July 2010.