

Appendix 6a: Darlington Draft SHLAA: Schedule of Comments Received and Steering Group Responses

General Comments

Respondent	Response	Steering Group Response
Environment Agency	No further comments.	Noted.
Northumbrian Water	Would like to see general comment on capacity included, as it was not possible to assess network capacity for each site and therefore capacity checks would be needed. The words suggested are: <i>"in all cases Northumbrian Water advise that capacity checks for both water supply and wastewater/sewerage would be needed as development plans become more certain".</i>	Include suggested wording at para. 5.11
Prism Planning	The core objective of the SHLAA process is to provide a potential 'pick list' for use in the allocations process of the LDF. The approach adopted has introduced subjective judgements that should be made at a later stage of the LDF process. The approach adopted means that you will have to go back and add into the mix those sites, like sites 17 and 18, which are technically free of constraint for consideration.	Agree that a 'pick list' is one objective of the SHLAA. However, the SHLAA guidance, in setting out actions authorities can take if insufficient sites can be identified, accepts that there will be circumstances when not enough sites can be identified. In updating the SHLAA (which is likely to commence in late Summer 2008), the Steering Group will need to consider what approach will be taken - identifying more sites, identifying broad locations or applying a windfall allowance.
Big tree Planning for Silverview Ltd.	Meeting the RSS requirement, para 2.7 Calculations in para. 2.7 are wrong. Should be a shortfall of 979 dwellings, equivalent to 27%. Additional sites will need to be brought forward to meet the shortfall.	Agree. Error in drafting. Propose change as suggested. Additional sites will be identified through LDF documents, using the findings of this SHLAA and its annual updates.
Barton Willmore for St. Modwen Ventures Ltd.	Para 2.7 Query the RSS shortfall quoted. Suggest para 2.7 is amended to 27% shortfall rather than 16% quoted.	Agree. Error in drafting. Propose change as suggested.
Big tree Planning for Silverview Ltd.	Implications of Housing Growth Point Status, para 2.8 The 20% uplift should be updated to reflect adopted RSS figures	The RSS EIP Panel report figures formed the basis of the expression of interest for Housing Growth Point (HGP) status that was submitted by the Tees Valley to DCLG in 2008. The DCLG offer letter of July 2008 effectively endorses the use of these figures as the starting point for calculating uplift, and further endorsement to the approach has been given by DCLG in approval of the Programme of Development for the HGP received in December 2008. Propose no change
Barton Willmore for St. Modwen Ventures Ltd.	Implications of Housing Growth Point Status, para 2.8 Suggest use of final RSS figures for calculating HGP uplift. Council should not use the current market situation as an excuse to plan for lower housing figures	HGP uplift based on RSS EIP figures is the approach that has been agreed by the Tees Valley Authorities with DCLG. Therefore, propose no change. The SHLAA is a technical document and does not contain any policy. Policy CS10 of the Core Strategy Preferred Options 2008 sets out the Council's latest intended policy position on housing numbers.
Big tree Planning for Silverview Ltd.	Implications of the Housing Market Downturn, Table 2.4 There is a discrepancy in the figures in Table 2.3 and Table 2.4	The discrepancy is explained in footnotes. Propose no change.
Big tree Planning for Silverview Ltd.	Sources of Supply, para 3.2 Sites 73 & 74 were not submitted for original SHLAA. New information is provided for a full assessment.	Sites were introduced into SHLAA because they were put forward for housing in response to LDF Core Strategy consultation in autumn 2008. New information provided will be considered as part of update of SHLAA if it adds to the information already collected about the site. Propose no change.

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Big tree Planning for Silverview Ltd.	Sources of Supply, Table 3.2 DUCS sites 110, 391, 523 and 531 should not be included as there is no resolution to dispose.	These sites have not been considered deliverable in the SHLAA. Propose no change.
Barton Willmore for St. Modwen Ventures Ltd.	Sources of Supply, Table 3.2 DUCS site 460: Northern part of the Whessoe Road site could be available now if no affordable housing is provided, to offset the abnormal costs associated with developing this site. Planning application to be submitted on this basis.	Update comment in Table 3.2 to reflect the possible intervention as being waiving of affordable housing requirement..
Big tree Planning for Silverview Ltd.	Agreeing an Approach to estimating the Potential of Each Site Para 3.13-3.15 SHMA states that there is a demand for flats (in certain locations) and also states that demand exceeds supply for all house types in rural areas.	Noted. Whether all demand in all locations will be met is a policy issue for the LDF Core Strategy. Propose no change.
Barton Willmore for St. Modwen Ventures Ltd.	Agreeing an Approach to estimating the Potential of Each Site Para 3.13 Broadly supportive of approach to estimating density. 30-40dph is an appropriate average density.	Noted.
Big tree Planning for Silverview Ltd.	Fig 4.1, page 12 Previous shortfalls in meeting the RSS requirement will have to be made up. The RSS allocation line should be changed going forward to reflect the existing shortfall	Agree. This is not disputed. The RSS requirement plotted is a direct lift from RSS. Propose no change.
Barton Willmore for St. Modwen Ventures Ltd.	Fig 4.1 and para 4.4, page 12 Need revising to reflect changes suggested to table 2.3 re: Housing growth point uplift.	HGP uplift based on RSS EIP figures is the approach that has been agreed by the Tees Valley Authorities with DCLG. Therefore, propose no change.
Barton Willmore for St. Modwen Ventures Ltd.	Para 4,4 Error in referring to 2009 and not 2011.	Noted . Change will be made once figures are finalised.
Big tree Planning for Silverview Ltd.	Para 5.2, page 21 Para 38 of PPS3 should also be taken into account as well as Policy 3 of RSS.	Agree. The factors identified in PPS3 have also been taken into account, as is apparent in the information provided in Appendix 7a. Propose no change.
Big tree Planning for Silverview Ltd.	Table 5.3: Sites Identified as Deliverable As all of the sites cannot be classed as deliverable, additional sites with no development constraints should be brought forward, such as Sites 73 and 74.	If there are insufficient deliverable sites for the first 5 years of the plan period, a comprehensive search for additional sites or broad locations will be carried out, taking account of the findings of the SHLAA and any newer information available, and reflected in the SHLAA update. Propose no change.
Big tree Planning for Silverview Ltd.	Conclusions, Para 5.14 and 5.15 The conclusions about the number of sites and the dwellings they will deliver need revising to take account of these comments.	The conclusions and total numbers will be recalculated in finalising this report.
Big tree Planning for Silverview Ltd.	Bringing the Findings Together, Table 6.1 A cumulative loss column needs to be added and these shortfalls need to be made up at some point.	RSS shortfalls need to be made up by the end of the RSS plan period (2021). The additional column suggested will be added to Table 6.1
Barton Willmore for St. Modwen Ventures Ltd.	Para 6.1 and Table 6.1, and Table 6.3, para 6.13(a) Amendments required to reflect earlier comments regarding	Consequential amendments will be made to Chapter 6 to reflect the finalised SHLAA findings.

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	Housing Growth Point uplift.	
Big tree Planning for Silverview Ltd.	Conclusions, Para 6.13 The key finding at para 6.4 needs to be added as a conclusion.	Agree. Change suggested will be made.
Barton Willmore for St. Modwen Ventures Ltd.	Suggests removing para 6.6 – the downturn should not be used to justify a return to lower levels of housing provision.	The level of housing requirement is a matter for planning policy documents and not the SHLAA. Core Strategy Preferred Options 2008 sets out the Council's current preferred approach to housing numbers. No change proposed.
Barton Willmore for St. Modwen Ventures Ltd.	Section 7 The SHLAA should be reviewed to identify further sites to meet the identified shortfall against need, or broad locations identified.	Agree. A review/update of the SHLAA will begin in late summer for completion by December 2009.
Nick Lawrence for County Durham & Darlington NHS Foundation Trust.	The Trust wish land at the northern end of the hospital site to be included in the SHLAA.	Noted. This will be included in Table 7.1 , and the site will be assessed in the first update of the SHLAA.
Barton Willmore for St. Modwen Ventures Ltd.	General Our clients believe that the draft SHLAA report has been produced in accordance with the relevant guidance.	Noted.

Site Specific Comments

Site No.	Site Name	Respondent	Response	Draft Steering Group Response
7	Darlington Timber Supplies	England & Lyle	Availability Question why site is available as it is still in business use, and owners intentions unclear.	No further information provided by or for site owner. Therefore remove from 'available' category.
10	Green St. Motors	England & Lyle for Green Street Motors	Availability Cross Town Route (CTR) allocation does not render the remainder of the site unsuitable. Study should have been commissioned before the SHLAA. That part of the site not affected by CTR is available now.	Agree, but uncertainty about the CTR will affect achievability and completion of possible later phases of development. Include 1.07ha of site (that part outside the CTR) as being deliverable in 2011-16, delivering 35 dwellings.
10	Green St. Motors	England & Lyle for Green Street Motors	Suitability: Noise issues will be overcome if site taken forward with adjacent Site 12 – that is what owner is committed to doing.	DBC Environmental Health is not certain that noise and contamination issues can be overcome. The onus is on the owner of the site to carry out technical studies to demonstrate that they can be overcome, and are not insurmountable constraints on development.
10	Green St. Motors	England & Lyle for Green Street Motors	Suitability: Land is not within flood zone 2 – that part of owners land was excluded.	Noted. Amend Appendix 7a .
10	Green St. Motors	England & Lyle for Green Street Motors	Availability A large housebuilder has an option on the site. Therefore is attractive to the market.	Agree. Amend to identify the site as available.
10	Green St. Motors	England & Lyle for Green Street Motors	Suitability: High risk of contamination and SAM should not be considered significant constraints to development.	Agree. Appendix 7a notes the findings of the assessment process. These particular considerations were not determinants of suitability in this instance.

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				No change proposed
12	Ward Bros	England & Lyle for Ward Bros.	Suitability Wildlife, archaeology and contamination are all constraints that can be overcome.	Agree. Appendix 7a notes the findings of the assessment process. These particular considerations are not determinants of suitability in this instance. No change proposed Additional text in main document at constraints to indicate that constraints identified are not showstoppers but can normally be overcome with mitigation measures> However, these constraints can slow delivery, adding to site preparation time
12	Ward Bros	England & Lyle for Ward Bros.	Suitability Owner committed to bring forward site with site No.10, therefore no noise issues.	DBC Environmental Health is not certain that noise and contamination issues can be overcome. The onus is on the owner of the site to carry out technical studies to demonstrate that they can be overcome, and are not insurmountable constraints on development.
12	Ward Bros	England & Lyle for Ward Bros.	Highway issues can be overcome, and could facilitate infrastructure improvements.	The highway constraints can be overcome though it is possible that a Transport Assessment for a combined site (12 and 10) will throw up a requirement to carry out improvements on the wider highway network (e.g. Albert Road/North Road/Whessoe Road junction); a contribution to works currently being proposed may be sought. Propose no change.
12	Ward Bros	England & Lyle for Ward Bros.	Availability SHLAA is contradictory. DBC requires site to be vacated within 6 months of business relocating. Therefore site is available. Client has interest from developers in respect of the site.	Agree, but uncertainty about the CTR will affect achievability and completion of possible later phases of development. Include site in the 'available' category and include 3.5ha of site as being deliverable in 2011-16 (that part outside the CTR reservation), i.e. 88 dwellings.
12	Ward Bros	England & Lyle for Ward Bros.	Suitability Cross Town Route does not render the remainder of the site unsuitable.	Agree, but uncertainty about the CTR will affect achievability and completion of possible later phases of development. Include 75% of site as being deliverable in 2011-16, i.e. 88 dwellings.
13	Mowden Hall	DTZ for DCSF	Achievability Happy with the capacity of 50 dwellings for the site but this does not include the potential of an additional 10 apartments that could be created from converting the listed building. Therefore suggest the figure is raised by 10 to 60.	Applying standard net:gross calculation and an assumed 30 dph density would suggest 65 dwellings. Therefore this proposed uplift to 60 dwellings seems reasonable. Make change suggested.
13	Mowden Hall	Big Tree Planning	Site is not going to be available at anticipated point of adoption of the Core Strategy. Therefore should not be considered deliverable.	The site is included because it meets 2 out of 3 of the criteria and only misses the third by a matter of months. It is suitable and there is a reasonable prospect of it being delivered within 5 years of the date of the adoption of the plan. Propose no change.
17 and 18	Roundhill Road and Middleton Road	Prism Planning	Suitability It is premature to say sites are not suitable when the Core Strategy has not been adopted. The SHLAA should not make judgements on matters of policy as a key principle.	The locational strategy of the Core Strategy will give a steer as to what role the villages will have in accommodating new development. Revised Preferred Options are likely to be published later this year. Para 38 of the SHLAA guidance lists 'policy restrictions' as one

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				of the factors that should be considered. Propose no change.
17 and 18	Roundhill Road and Middleton Road	Prism Planning	Suitability Neither the current PPS3 or the RSS say that all the sites allocated must be brownfield land. In the current climate, greenfield sites are potentially the only ones that are likely to be brought forward in the short term.	Agree. However, if additional sites need to be found, either for the first 5 years of the plan period or for years 6-10, then a comprehensive search for additional sites will be carried out, taking account of the findings of the SHLAA and any newer information available, and will be reflected in the SHLAA update. Brownfield sites are still coming forward for development, e.g. planning applications are pending for Lingfield Point and the former Corus Works, and development is progressing at Parkside and the former College. Propose no change.
17 and 18	Roundhill Road and Middleton Road	Prism Planning	Suitability Both sites have been identified as having good access to shops, services and a choice of public transport.	Agree, but this is not the only factor that has been taken into consideration. Propose no change.
18	Middleton Road	Prism Planning	Constraints There is no practical constraint on the development of this site after 2010, when works to upgrade sewage capacity are completed.	The key constraint on this site is the current planning policy, which identified the site as outside development limits. Information on this site can be updated to take account of an emerging changing policy position. Propose no change.
26	Hopetown House	Big Tree Planning	Site likely to be contaminated and may not now be viable.	This is unsubstantiated supposition. Propose no change.
39	Land to the East of Whessoe Road	NLP planning for Southlands Management Ltd.	Suitability Issues raised not insurmountable, and could be addressed with mitigation measures.	Appendix 7a notes the findings of the assessment process. These particular considerations are not determinants of suitability in this instance. No change proposed.
39	Land to the East of Whessoe Road	NLP planning for Southlands Management Ltd.	Achievability Suggest site, together with Site 8, could provide a logical urban extension to the Harrowgate Hill area in the period 2011-16. Site should be considered to meet the existing under provision against RSS requirements identified in the draft SHLAA.	Site 8 relates visually to the existing housing at Harrowgate Farm; Site 39 relates visually to the industrial uses and electricity transformer station. Any shortfall against RSS requirements will be addressed by considering all suitable sites in a comprehensive manner thorough a n update to the SHLAA. Therefore propose no change.
40	Skerningham	NLP planning for Southlands Management	Suitability: Issues raised not insurmountable, and could be addressed with mitigation measures.	Highway issues are a significant constraint on development of any size in this general location. The need for additional highway infrastructure should become clear on completion of the Connections study, due to be undertaken and completed by July 2009 by Urban Initiatives, and this information can be fed into an update of the SHLAA. Propose no change.
41	Whessoe Road	Barton Willmore for St. Modwen Ventures Ltd.	Meeting RSS requirements: Site should be considered as an urban extension to meet the existing under provision against RSS requirements identified in the draft SHLAA.	Further consideration can be given to this following completion of the Connections Study. Propose no change in this SHLAA.
41	Whessoe Road	Barton Willmore for St. Modwen	Achievability: Whole site could be built out over 7 years, and could be done by	Make changes suggested to projected build out rates.

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		Ventures Ltd.	2016, at a build rate of 35 dwellings per year.	
41	Whessoe Road	Barton Willmore for St. Modwen Ventures Ltd.	Tables 5.1, 5.2 and 5.5. Amend figure in tables to 250, which is the figure that will be the subject of a planning application to be submitted this month.	Make changes suggested.
41	Whessoe Road	Barton Willmore for St. Modwen Ventures Ltd.	Para 5.6 and Table 5.3 Need to reflect that Site 41 is able to deliver new dwellings in 2009-11 and well as 2011-16.	Noted. Make change to text of 5.6 to reflect this.
41	Whessoe Road	Barton Willmore for St. Modwen Ventures Ltd.	Table 5.4 Unclear why site 41 is included in this table. Should be removed. Site will be built out by then.	At a build out rate of 35 dwellings per year, there are still going to be a few dwellings remaining for completion from 2016 onwards. It is unrealistic to expect 35 completions in 2009/10 when the application for planning permission has not yet been submitted. Figures will be amended, but site will be retained in Table 5.4.
41	Whessoe Road	Barton Willmore for St. Modwen Ventures Ltd.	Figure 1b: Colour of Whessoe Road site needs amending.	Agree. Change will be made
41	Whessoe Road	Big Tree Planning	Not all site is available at anticipated point of adoption of the Core Strategy. Therefore only part should be considered deliverable. Also, the site is likely to be contaminated and due to falls in land values the site may no longer be viable.	Most of the site will be available at the point of adoption of the Core Strategy and the remainder potentially very soon after. The comments about land value and contamination are unsubstantiated., and do not outweigh information provided by the site owners, St. Modwen. Therefore propose no change.
41	Whessoe Road	Big Tree Planning	Clarification is needed on how many dwellings are to be delivered on this site.	The figures for deliverable and developable will be amended in the light of new information from the owner's agent (see above)
44	AMEC Haughton Road	DTZ for AMEC	Availability Site is now likely to become available earlier than 2012, and at a build rate of 50 dwellings per year could all be built out in 2011-2016. It is owners intention to develop the site as soon as possible in the period 2011-2016.	(i) Delete available from 2012 from Table 5.3
44	AMEC Haughton Road	DTZ for AMEC	Achievability Consider the site capacity to be 225 on the basis of a 75% net developable area and 40 dwellings per hectare, and that the whole site may be developed for housing. 25% of the gross site area is adequate for other uses, such as community facilities and open space, and 40dph is in line with PPS3 requiring the efficient use of land, accommodating higher than minimum densities in highly accessible locations.	The site has been put forward for mixed use development, so the capacity suggested seems high. Propose no change.
44	AMEC Haughton Road	DTZ for AMEC	Constraints Site investigation and gas monitoring results will be available in April and September 2009.	Make amendment to constraints information as suggested.
44	AMEC	Big Tree Planning	The site is not available at the anticipated date of adoption of the Core Strategy.	More recent information provided by the site owner is that the site will be available sooner. Therefore propose no change.
45	Darlington Memorial Hospital	Nick Lawrence for County	Availability Latest position is that Trust now not likely to dispose of this land.	No change to potential dwellings. This can be changed in the update to the SHLAA when the Trust Board has made its

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		Durham & Darlington NHS Foundation Trust.		decisions.
45	Darlington Memorial Hospital	DTZ for County Durham & Darlington NHS Foundation Trust.	Availability Trust expects the site to be deliverable in the period 2011-2016.	Superseded by response above.
46 and 47	Merrybent Full and Merrybent Frontage	Mr Turnbull	Concerned that the approach will neglect rural areas, for which a high demand has been identified. Rural housing needs will not be addressed. The policy framework could be changed to allow sites like these to be brought forward and meet needs. Needs to be a more flexible approach for rural areas.	Changes to the policy framework will be made through the LDF.
46 and 47	Merrybent Full and Merrybent Frontage	Mr Turnbull	Suitability Queries why Merrybent is now considered remote from shops and services when planning application reports for Merrybent Nurseries considered the location sustainable.	
46 and 47	Merrybent Full and Merrybent Frontage	Mr Turnbull	Suitability The site would round off Merrybent, being adjacent to the main road. The larger of the sites is offered for mixed use development.	Noted. No change proposed.
50	Woodburn Nurseries	Big Tree Planning	Developability No resolution to dispose. Therefore the site is not genuinely available.	Sites 53, 55 and 58 have been reviewed and are now considered not available, because there is no resolution to dispose and to develop part of open spaces would be a new approach for the Council. Sites 50 and 64, in operations use and vacant respectively, are still considered available, but not deliverable in the first 5 years of the plan period, as there is much more likelihood of these being brought forward for disposal. Change 53, 55 and 58 to not available.
53	Sherbourne Close	Big Tree Planning	Developability No resolution to dispose. Therefore the site is not genuinely available.	
55	Mayfair Road Open Space	Big Tree Planning	Deliverability No resolution to dispose. Therefore the site is not genuinely available.	
58	Sparrow Hall Drive Open Space	Big Tree Planning	Developability No resolution to dispose. Therefore the site is not genuinely available and can't be classed as deliverable.	
64	Blackett Road	Big Tree Planning	Developability No resolution to dispose. Therefore the site is not genuinely available and can't be classed as deliverable. Also the site is likely to be contaminated and reduced land values mean it may not now be viable.	
72	Lingfield Point	Big Tree Planning	Suitability If the planning application is refused, this cannot be classed as suitable for housing. 400 dwellings cannot be delivered in a 5 year timeframe on one site. Also the site is likely to be contaminated and reduced land values mean it may not now be viable.	The site could still be considered suitable for housing even if the specific application that has been submitted is refused. The HBF advice indicates that 400 dwellings could be delivered over a five year period if two or more developers are on site at once. There is no evidence to support the suppositions put forward. Therefore propose no changes.
73 and 74	Hunter's Green and St. Margaret's Close	Big Tree Planning for Silverview Ltd.	Sites are considered suitable for mixed residential schemes, and could deliver affordable and intermediate housing within the next 5 years.	Additional information provided. Propose no change to assessment of these sites.
73 and	Hunter's Green and St.	Big Tree Planning for	Table 5.3: Sites Identified as Deliverable As all of the sites cannot be classed as deliverable, additional sites	If there are insufficient deliverable sites for the first 5 years of the plan period, a comprehensive search for additional sites will be

Site No.	Site Name	Respondent	Response	Draft Steering Group Response
74	Margaret's Close	Silverview Ltd.	with no development constraints should be brought forward, such as Sites 73 and 74.	carried out, taking account of the findings of the SHLAA and any newer information available, and reflected in the SHLAA update. Propose no change.
73 and 74	Hunter's Green and St. Margaret's Close	Big Tree Planning for Silverview Ltd.	Table 5.4: Sites Identified as Developable Not all the sites in this table can be classed as deliverable. Therefore additional sites with no development constraints should be brought forward, such as Sites 73 and 74.	If there are insufficient developable sites, a comprehensive search for additional sites will be carried out, taking account of the findings of the SHLAA and any newer information available, and reflected in the SHLAA update. Propose no change.
73 and 74	Hunter's Green and St. Margaret's Close	Big Tree Planning for Silverview Ltd.	Overcoming constraints, Table 5.7 Sewage capacity constraints at Middleton St. George will be overcome by 2010. Therefore should not be an issue for considering suitability of sites after 2011.	Agree, but this information needs recording in the SHLAA as it informs conclusions about the 5 year supply of deliverable sites from 2009 as well as providing the evidence to underpin the identification of specific deliverable housing sites from 2011. Propose no change.
73 and 74	Hunter's Green and St. Margaret's Close	Big Tree Planning for Silverview Ltd.	Bringing the Findings Together, Figure 6.1 The RSS line is inaccurate and should account for earlier shortfalls. Sites 73 and 74 which are suitable, available and deliverable could make up this shortfall.	The RSS line accurately reflects RSS requirements. If there are insufficient sites, a comprehensive search for additional sites will be carried out, taking account of the findings of the SHLAA and any newer information available, and will be reflected in the SHLAA update. Propose no change.
73	Hunter's Green	Big Tree Planning for Silverview Ltd.	Summarising the SHLAA findings, Para 5.13 argues that the site is accessible to shops and services, its development would not lead to the merging of the 2 settlements, a full archaeological report would be needed to identify the that as a constraint on development.	No additional information provided about access to services. The site is within the gap that separates Middleton One Row from Middleton St. George. Agree archaeology unlikely to be showstopper, but could affect the net developable area, which is why it was assessed. Propose no changes.
74	St. Margaret's Close	Big Tree Planning for Silverview Ltd.	Summarising the SHLAA findings, Para 5.13 Site is not rural because it is bounded by housing on 3 sides. Development would represent infill. Argues that the site is accessible to shops and services, and the lack of an archaeological assessment should not discount the site from being suitable.	Sites outside development limits in village locations have all been treated the same and classed as 'rural countryside' sites. Infill is within development limits. Archaeological considerations have not affected consideration as to whether the site is suitable. Propose no change.