CHAPTER THREE – ACHIEVING A MORE SUSTAINABLE COMMUNITY
CS1 – Darlington’s Sub-regional Role and Locational Strategy

CSRPO/0041/CDDR Nicholas Lawrence County Durham & Darlington NHS Foundation Trust Objection The Para preceding the strategic locations references, new development and regeneration but does not cover redevelopment, which is distinct from regeneration. Albeit both regeneration and redevelopment comprise new development under the provisions of the TCPA. To ensure that existing sites, such as the DMH site can be redeveloped without being contrary to proposed CS1. To provide the flexibility required of CS the Para needs to be amended, adoption of such approach would provide flexibility, which is required to deliver an evolving clinical model that may require the redevelopment of healthcare facilities. RECOMMENDED CHANGES: First part of the third Para of CS1 to read: ‘New development, redevelopment and regeneration activity’. Regeneration is an umbrella term. Regeneration can include redevelopment, improving existing development and new development. The policy as drafted would not preclude the redevelopment of healthcare facilities at DMH.

CSRPO/0011/7PAG Peter Wood Seven Parishes Action Group N/A Support Page 24 Para 3.1.13 - It is pleasing to note that the CS states that ‘villages are considered an integral part of making Darlington an attractive place to live’. Support noted None

CSRPO/0042/EH Alan Hunter English Heritage N/A Comment Para 3.1.5 Points out that, for the most part, heritage assets are capable of successful incorporation into new developments in ways that do not harm their significance or special interest. The distinction between heritage protection and heritage avoidance. Noted May need to amend wording to say ‘...urban areas where this does not prejudice heritage or nature conservation or impinge on land protected for recreational purposes’.

CSRPO/0032/man Manners Family Trust and Manners Farms Ltd Manners Family Trust and Manners Farms Ltd England and Lyle Objection Support development and infrastructure provision to fulfill the town’s gateway and sub-regional centre role and its role as the primary location for residential development serving the Borough and its hinterland. Supports identification of residential development locations in the urban fringe, but object to identification of land North West and East of the Urban Fringe as strategic locations for new housing development; suggest land on the Western Fringe of the town would be a more suitable and sustainable location for such development and would better fulfill the broader strategic vision and spatial objectives of the Core Strategy, and could be developed as a whole or in part. The broad location of the Western Urban Fringe, which encompassed the land that is the subject of this representation, was considered for development at the urban fringe. The basis for selecting the preferred locations is presented in Appendix 6 of the Revised Preferred Options Core Strategy document. None

CSRPO/0032/man Manners Family Trust and Manners Farms Ltd Manners Family Trust and Manners Farms Ltd England and Lyle Support Para 3.1.8 support Council’s assessment of available housing sites. Support Noted None

CSRPO/0035/EA Liz Lightbourne Environment Agency N/A Comment Although generally supportive of this policy, blanket areas given to regeneration should be assessed on whether or not development is suitable in those areas. As discussed above, the Sequential Test should be demonstrated for these areas and flood risk taken into account. A Core Strategy Sequential Test assessment will be prepared to underpin the submission Core Strategy. None

CSRPO/0042/EH Alan Hunter English Heritage N/A Comment Para 3.1.14 proposes the delineation of limits to development around settlements. Lines are to be put on maps it is important to do so in such a way that it does not lead to the cramming of development onto sites and spaces which contribute positively to the character of their locality, especially if designated a conservation area. Lines are to be put on maps, but not in the Core Strategy document. The development of sites and spaces within development limits will be in accordance with other plan policies and the Design of New Development SPD, which, amongst other things, safeguard the character and appearance of conservation areas. None

CSRPO/0050/TESCO N/A Tesco Stores Limited Development Planning Partnership Objection Local services should be added to any areas cited within the policy where the priority use is housing, as these locations require complementary ancillary services. The relevant retailing issues are covered in Chapter 5 and Policies CS7-9. None
Sainsbury’s support the intentions of Draft Policy CS1 in acknowledging the role that edge of centre sites can play in accommodating new development. Particularly, where these sites are situated in sustainable locations and are well connected with the town centre. As part of the locational strategy, greater clarity should be provided on the precise location and scope of the identified priority areas for new development, namely the town centre fringe area. PPS12 allows for strategic allocations to be made for the development of sites considered to be central to the achievement of the strategy. Furthermore, an extension of the Town Centre to the South for retail purposes should be included within this policy as an alternative to extending the Town Centre in a western direction. Town Centre services are easily accessible from the Sainsbury’s site. It is obvious that many people, not only Sainsbury’s customers are using the Sainsbury’s car park and walking into the Town Centre to do their shopping. The site is in a very convenient location and is well linked to both the bus station and train station and there are good links to cycle routes.

Charles Johnson

Two concerns: Firstly, the viability and reliance on the Central Park development, which seems to have eclipsed other development plans. I wonder whether it is prudent to name the site. The precise area of the Town Centre Fringe should be identified through a subsequent Development Plan Document. This policy is a general locational strategy and it is not appropriate to deal with any extensions to the town centre here. Chapter 5 makes clear that other than for the Commercial Street and Feethams/Beaumont Street areas, no allocations for new retail development are needed in the Core Strategy. The appropriateness of the existing detailed boundaries of the town will be addressed in the forthcoming Making Places DPD. It should be noted, however, that based on the definition of the prime shopping area in PPS4 (that is, the town centre for retail purposes), the Victoria Road Sainsbury’s site will not be included within it.

Manners Family

Way to the west of the urban fringe would provide a more sustainable and appropriate location for new development.

Norman Welch

Support strict adherence to the declared intention that outside the limits of the main urban area and the villages, development will be limited to that provided to meet identified rural needs. Support strict adherence to the declared intention that outside the limits of the main urban area and the villages, development will be limited to that provided to meet identified rural needs.

Manners Family

The respondent does not indicate what else needs to be done to make the work robust in their view. The strategic locations options appraisal (Appendix 6 to the Core Strategy Revised Preferred Options), together with sustainability appraisal, is considered a robust analysis with an appropriate level of detail for the consideration of alternative strategic options.
Dobbies has identified a deficiency in high quality garden centres in the area and as a result, is looking to develop a Dobbies Garden World to the north of Darlington. It is considered that a Dobbies Garden World could potentially be located within the area identified in policy CS1 as Darlington’s North West Urban Fringe for new housing, tourism and employment development. It is considered that a Dobbies Garden World in this location would complement the proposed tourism development in this area and the proposed Strategic Tourism Opportunity identified in policy CS6. A Dobbies Garden World, in addition to its core plants and gardening products, includes facilities such as a high quality café/restaurant area, outdoor plant display and gardens set within extensive landscape settings. Through such facilities, Dobbies aim to create an exceptional leisure and retail experience to inspire, educate and entertain through the quality of the environment and its products inspired by nature. As a result of this philosophy, existing Dobbies stores experience extended dwell times when compared to usual mainstream shopping habits and become an attraction in the area in their own right with visitors spending extended periods of time enjoying the garden centre. As a result, the majority of existing Dobbies stores have achieved four-star accreditation as visitor attractions from the relevant local tourist boards. Consequently, we would suggest that such a facility in the North West Urban Fringe Area would help to facilitate and deliver the policy aspirations. It is requested that this be acknowledged within the Local Development Framework policy.

Support references to DTVA throughout document in particular CS1, 5, 6 and 19. Welcome reference to safeguarding land in respect of renewables but may also need to address this issue further in terms of other land uses in other DPDs and plans.

Support the broad locations for future development. However, prior to providing its final support for the locational strategy, NWL urge that the Council embraces the caveats that the growth planned to 2021 is a significant increase over what is being planned for in its current investment at Stressholme Sewage Treatment Works (STW) to address quality and growth issues, due for completion in 2010, and at first assessment would exceed the planned capacity of the STW. A detailed growth assessment would be required for in current scheme to include all factors such as migration, household size, and employment development. There is a capacity constraint at Middleton St George STW. This must be addressed by a scheme to transfer the sewage flows to the Stressholme STW for treatment there. The scheme should be implemented in the current phase of the Company’s investment programme ending in 2010. Future development at Teesside Airport must drain to the new pumping station and, depending on the scale of the development; the foul sewage element may be accommodated by an extension of the pumping station. However, any proposals to deal with de-icing flows from the airport would require an extension of the Stressholme STW. The scale of development may give rise to some water supply problems that will require reinforcement of the network. However this can be planned in with early discussion with Darlington Council. In connection the locational strategy, early consultations with Darlington Council would be welcomed to ensure NWL’s investment programme provides for adequate infrastructure capacity over the LDF plan period. It is still not clear what is meant by ‘identified rural needs’ in relation to development outside limits to development – how are these needs defined? For example would this preclude opportunities to develop farm diversification projects linked to green/nature-based tourism? Need clarification in supporting text.

Support references to DTVA throughout document in particular CS1, 5, 6 and 19. Welcome reference to safeguarding land in respect of renewables but may also need to address this issue further in terms of other land uses in other DPDs and plans.

Supporting the Core Strategy for the location of the new tourism facility within the Darlington Borough. The Core Strategy is a strategic planning policy document; it is not its role to specify a particular type of tourism facility that should be provided. None
Too general with regard to role of small-scale development outside development limits of urban area and smaller settlements. Recommends that the Council continue to take a robust yet flexible stance to the conversion of buildings in rural areas similar to LP policy H7. Consider that proposed changes pay full and due consideration to PPS7. The proposed change is too detailed for inclusion in the Core Strategy policy, and does not entirely accord with PPS7. Consideration can be given to including a policy of this type in Making Places DDP, if the Council considers local circumstances justify an approach different to that set out in national guidance. Check response with DC.

The objection is over the proposed change of wording which is generally broad and too general with regard to role of small-scale development outside development limits of urban area and smaller settlements.

The recommendation is that proposed changes pay full and due consideration to PPS7. The proposed change is too detailed for inclusion in the Core Strategy policy, and does not entirely accord with PPS7. Consideration can be given to including a policy of this type in Making Places DDP, if the Council considers local circumstances justify an approach different to that set out in national guidance.

No further action.
<table>
<thead>
<tr>
<th>Document Code</th>
<th>Author</th>
<th>Organization</th>
<th>Type</th>
<th>Objection/Comment</th>
<th>Note</th>
<th>Implementation</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSRPO/0042/EH</td>
<td>Alan Hunter</td>
<td>English Heritage</td>
<td>N/A</td>
<td>Objection</td>
<td>CS2 implementation framework identifies conservation area character appraisals as a delivery mechanism but they ought to be accompanied by management plans. Conservation plans for heritage assets are also a valuable guide to appropriate delivery.</td>
<td>Noted</td>
<td>Implementation section will be amended accordingly</td>
</tr>
<tr>
<td>CSRPO/0042/EH</td>
<td>Alan Hunter</td>
<td>English Heritage</td>
<td>N/A</td>
<td>Support</td>
<td>Note the observation made in Para 3.2.12. Self-evident it may be, but a point worth making all the same.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0003/Cjp</td>
<td>Charles Johnson</td>
<td>DBC (Councillor)</td>
<td>N/A</td>
<td>Objection</td>
<td>d) The car is not included. Over 50% of passenger journeys are by motorcar and owning a motorcar is one of the priority aspirations of individuals and families who do not have a car. It is accepted over the long term aspirations may change however while public transport does not meet the demands of most travellers cars should be properly catered for f) Elevation of standards will result in developers cost and pricing will exacerbate housing difficulties. Affordable housing has made developers think twice about tendering and many seek to negotiate out of the requirements. g) Outdoor spaces should be properly supported with maintenance plans and revenue</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0024/BA</td>
<td>Tony Cooper</td>
<td>Bussey and Armstrong</td>
<td>N/A</td>
<td>Objection</td>
<td>Agree with the revised approach to follow government and regional guidelines in relation to implementation of the CSH. Implementation of the current level 3 is already impacting on the costs of construction. Further stages of the code will involve methods of construction and energy conservation which are untried and untested with the consequent uncertainty of cost. There is a severe risk that the residual land values in the Northern region which are considerably less than elsewhere in the country will be absorbed by the increasing costs of achieving the proposed targets. Some flexibility is suggested in the approach. Should the government reduce or defer requirements, is there sufficient allowance in the CS2 to adapt to this?</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0042/EH</td>
<td>Alan Hunter</td>
<td>English Heritage</td>
<td>N/A</td>
<td>Objection</td>
<td>Sets the context for achieving high quality, sustainable design. Its clear and well made. New development should occur so that it chimes with and respects its (historic) context and is borne of an understanding of the character and unique sense of place of its locality. There is an acknowledgement that there are also social and economic imperatives for taking this approach. CS2 (B) should more make the point that development should also respond to the historic dimension of 'place'.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0037/NWL</td>
<td>Mr. Steve Wharton</td>
<td>Northumbrian Water Limited</td>
<td>England and Lyle</td>
<td>Support</td>
<td>Para 3.2.5. NWL support references to water efficiency, flood risk and drainage and consider this reflects previous comments relating to climate change at the issues and options and Preferred Options stage.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0037/NWL</td>
<td>Mr. Steve Wharton</td>
<td>Northumbrian Water Limited</td>
<td>England and Lyle</td>
<td>Objection</td>
<td>S106 agreements should also cover provision of multi functional green infrastructure and landscaping.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0059/NE</td>
<td>Tracy Jones</td>
<td>Natural England</td>
<td>N/A</td>
<td>Objection</td>
<td>Should also refer to the Darlington Rights of Way Improvement Plan to reflect criteria (a) in the policy and the Tees Valley Biodiversity Action Plan to reflect criteria (g) in the policy. S106 agreements should also cover provision of multi functional green infrastructure and landscaping.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0058/EA</td>
<td>Liz Lightbourne</td>
<td>Environment Agency</td>
<td>N/A</td>
<td>Objection</td>
<td>Para 2.3.15 recommends that water efficiency is considered along with energy efficiency or as an extra point. Proposed Objectives Bullet point 1 should include water: 'of land, buildings, waste and water.... This is supported in CS2 by achieving sustainable design and applying the Code for Sustainable Homes and BREEAM standards.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0058/EA</td>
<td>Liz Lightbourne</td>
<td>Environment Agency</td>
<td>N/A</td>
<td>Objection</td>
<td>Darlington is not covered by the Tees Valley Biodiversity Action Plan, however reference to the Durham Biodiversity Action Plan will be made.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
<tr>
<td>CSRPO/0058/EA</td>
<td>Liz Lightbourne</td>
<td>Environment Agency</td>
<td>N/A</td>
<td>Objection</td>
<td>Reference to the Durham Biodiversity Action Plan and other consultee amendments will be made accordingly.</td>
<td>Comments welcomed and noted</td>
<td>None</td>
</tr>
</tbody>
</table>
Concerned at the proposal to have 3 wind farms one of which is in Hurworth. Request an urgent meeting to discuss this topic, particularly as the wind farm will be situated on the 18th Green of Stressholme Golf Course.

Comments welcomed and noted

Three potential areas of search have been identified in the Borough; this does not equate to three wind farms. These are only potential locations for wind energy development, a developer would need to assess these areas in detail, considering all potential constraints, including the impact on the community before a planning application could be submitted and considered. No plans have been submitted that propose a wind energy development on or near to Stressholme Golf Course.

Community ownership will be added to the Making It Happen section.

There are no stated delivery partners for DBC to work with in promoting renewable energy nor is there any mention of community ownership of distributed renewable energy assets.

Further consideration of comments required

Community ownership is recognised as another potential delivery partner.

The RSS and the ARUP report identified the North Eastern part of the Borough as an area of least constraint. The ARUP report acknowledges that the whole of Darlington was not considered in a similar way. Entec have gone some way to redressing this balance, but these points are very detailed and require further consideration before detailed responses can be provided.

These points are very detailed and require further consideration before detailed responses can be provided.

Comments welcomed and noted

There is a welcome reference in Para 3.3.11 suggesting a need to consider the cumulative impact of wind energy developments within the Borough and neighbouring County Durham. There is no diagrammatic demonstration, which reflects this statement within the CSRPO. Do not consider it acceptable to include the detail in fig 3.1 without showing a similar scaled drawing and projection for the other 2 areas identified as areas of least constraint in fig 3.2 with the detail for any of the proposals in County Durham that are currently available. If this is not possible then as a minimum wish to see fig 3.1 either removed completely or actually annotated as ‘an example of one of the identified areas of least constraint’. Otherwise the residents within the North Eastern area of the Borough could undoubtedly feel that they had been subjected to a number of different treatment and such discrimination or indeed prioritization may not be acceptable to the residents of Darlington.

None
Objection

Paragraph 3.3.5 All recommendations in the Arup report should be incorporated not just some of them, especially that wind farms should be at least 5km away from each other to reduce impact on amenity and cumulative impact. Draw upon current planning application at Moor House to demonstrate point. Paragraph 3.3.5 misquotes Arup; the report states that area can only accommodate small/medium small wind farms of 4-6 turbines NOT medium to small wind farms.

Objection

Both Bishopton and Sadberge are conservation areas and are severely threatened by being overburdened from the successive developments of wind farm applications in the north east of the Borough. CS3 must be strengthened to protect tranquil, local environments from the negative impacts of successive wind farm applications.

Objection

Para 3.1.13 It is pleasing to note that the CS states that ‘villages are considered an integral part of making Darlington an attractive place to live’.

Objection

It is disappointing that DBC have invested heavily in the ARUP report and in the Decentralised Renewable and Low Carbon Energy study and engaging the public but have chosen not to reflect the findings from these reports and consultations in CS3. It is not acceptable to remain silent on key factors e.g. constraints which would make identified land resources for the development of wind energy less acceptable to the people of Darlington.

Objection

Based on potential visual and landscape impact alone, this area has the potential for more than one development of approximately 4-6 medium to small-scale turbines. Selective referencing has been used as the ARUP report states for zone 23/24 which appears to be the area covered in diagram 3.1. In principal the landscape could have the capacity to accommodate more than one medium small – small-scale development (i.e. 4-6 turbines per development). The constraints map indicates that there is very little unconstrained land within this zone. The ARUP reports propose that wind farm developments should be separated by a minimum distance of 5km and yet this is not referenced. Suggest that the ARUP report is reflected accurately otherwise the reasons for selective referencing could be open to misinterpretation and subsequently challenged.

Objection

Paragraph 3.3.5 The CS is for the next 15 years. Not appropriate to make the time limited statement ‘Wind generation schemes are being proposed for this Borough; approved up to 38 mw installed capacity could be delivered’. This refers to current planning applications and scoping proposals, which may or may not come to fruition and may or may not deliver an installed capacity of up to 38 MW. This statement needs to be removed as it will rapidly date.

Objection

Section 3.3 is the weakest section of the document and does not fully reflect the Government’s ambitions to move to a low carbon economy. Reference should be made to the UK Low Carbon Transition Plan, the UK Renewable Energy Strategy, the introduction of Feed In Tariffs for small-scale electricity generation from renewable sources, the proposed introduction of Renewable Heat Incentives, Heat and Energy Saving Strategy consultation, funding for a ‘Plugged-In Places’ charging infrastructure for electric cars. The transition to a low carbon way of life is not central to CSRPO then it may be out of date. (1) CSRPO should refer to the provision of infrastructure for electric cars. (2) All new buildings should have south-facing roof slopes with the optimal pitch for solar water heating or solar photovoltaic panels.

Objection

Para 3.3 ‘Wind energy alone will not be enough to significantly reduce the Borough’s consumption of fossil fuels’. Moor House would provide up to 65 Gwh per year, 13 of the total requirement, which is significant. There is also potential for at least one more wind farm if Royal Oak overcomes its aviation problems. There is one current renewable energy facility at Stressholme wastewater treatment works (340 kw (0.34 mw) capacity, Moor House would have 20-25 MW installed capacity, which shows the scale of contribution, which could be made.

Sadberge Parish Council understands that Section 3.3 is largely based on the Decentralised Renewable and Low Carbon Energy Study carried out by Entec. This study was very superficial and contains a number of serious errors, which have also been included in the Core Strategy: Revised Preferred Options document. Section 3.3.5 states that the Regional Spatial Strategy "identifies the north eastern part of the Borough as part of an area of least constraint". This is not true. The Regional Spatial Strategy does identify a number of "broad areas of least constraint for medium scale wind energy", but the marker for the Tees Plain broad area of least constraint is shown to the west of the A19 well to the north of Wynyard. No reasonable person would interpret this as identifying the north-eastern part of the Borough of Darlington as part of an area of least constraint. In carrying out its Wind Farm Development and Landscape Capacity Studies: East Durham Limestone and Tees Plain, Arup did use the Regional Spatial Strategy as the starting point to define its 'study area', and this study area does include the north-eastern part of the Borough of Darlington. However ... Figure 3.1 in the Core Strategy: Revised Preferred Options document misrepresents the 'least impact' area defined in the Arup report. The area shown in Figure 3.1 is Arup's 'study area'. Note in particular that Sadberge is included in Arup's study area, but is not included in Arup's least impact area. 3 Note 1. Arup's 'study area' is shown in Figure 2 on page 16 of the Arup report on Wind Farm Development and Landscape Capacity Studies: East Durham Limestone and Tees Plain. Arup's 'least impact area' is shown in Figure 11 on page 64 of the same report, and also in Figure 2 on page 1 of Arup's subsequent Addendum to its original report. The Entec report also confuses Arup's study area and least impact area. This is a serious error, because the mistaken assumption that Arup's least impact area includes the whole of the north-easter part of the Borough of Darlington clearly plays an important role in the definition of the 'potential areas of least constraint' in figure 3.4 of the Entec report and Figure 3.2 of the Core Strategy: Revised Preferred Options document. Section 3.3.5 of the Core Strategy: Revised Preferred Options document states that the Arup report says that the area of least constraint 'has the potential for more than one development of approximately 4-6 medium to small-scale turbines'. This is a misquote. In fact, the Arup report says that the least impact area could accommodate 9 - 15 additional wind turbines in medium small-to-small clusters (i.e. 4 - 6 turbines per cluster). The specification of the three 'potential areas of least constraint' in Figure 3.2 is based on (i) the misrepresentation of Arup's least impact area and (ii) a very superficial analysis of the issues and options. In particular, the analysis does not take account of visual impact (individual or cumulative) or the potential effect on air traffic control radar. Sadberge Parish Council believes that these issues should be taken into account in the Core Strategy document, and that when they are included in the analysis it will be seen that a significant part of the 'potential area of least constraint for wind energy generators' around Sadberge is, in fact, unsuitable for commercial scale wind turbines. Section 3.3.6 states that the three areas of least constraint could potentially generate over 100MW installed capacity. This appears to be based on the 'technical potential' given in the Entec report. The 'technical potential' figure is effectively meaningless, as it ignores important practical constraints on numbers of wind turbines. At present, the Core Strategy: Revised Preferred Options document does not include any realistic assessment of the potential for wind power generation within the Borough of Darlington. Such an assessment should be included in the document, but it needs to give a sensible, practical estimate of the potential for wind power generation. Notes 1. According to Entec's figures, achieving the 423 GWh per annum would require 70 - 80 'larger' wind turbines plus 162 - 356 'smaller' turbines = a total of 232 - 436 commercial-scale wind turbines. This is clearly impractical. 2. To illustrate how inappropriate it is to use 'technical potential' in this context, the 'technical potential' annual mileage of a typical car could be calculated as 70 miles per hour x 16 hours per day x 365 days per year = 408,800 miles per year. This gives no useful information about how many miles a car is likely to be driven in practice. Sadberge Parish Council suggests that Section 3.3 of the Core Strategy: Revised Preferred Options document needs a fundamental revision, and that this should be done on the basis of a fresh – and more thorough - analysis of the issues, starting from a correct interpretation of Arup's 'least impact area'. The revision of Section 3.3 should also take into account the points made in Sadberge Parish Council's document Suggested Wind Farms Policy, which was issued on 16-Dec-2008. (Copies of this document were given to Darlington Borough Council Planning Officers at the time, but if you would like additional copies then please contact me.) 4 The Parish Council also points out that:- • In the Entec report, the section on micro-renewables mentions ground source heat pumps, but fails to mention air source heat pumps, which are likely to be more appropriate for the urban part of Darlington. • Also in the Entec report, the statement that "CO2 savings associated with GSHP are not considered as electricity usage is increased by use of this technology" shows a fundamental lack of understanding of heat pumps.
Welcome the emphasis placed on the importance of providing energy from renewable sources to help meet the targets in the UK Renewable Energy Strategy (meet the EU target of ensuring 15% of energy comes from renewable sources by 2020) particularly from wind which will play a pivotal role and rapidly expand over the next ten years. Note the requirement for all major developments to provide minimum of 10% of energy from renewable sources, consistent with Government objectives to generate 10% of electricity from renewable energy sources by 2016. Welcome CS3’s recognition of the potential for various types of renewable energy generation in the Borough and the requirement, where opportunities exist, for development to connect to existing installations or schemes. Welcome CS3’s recognition of the need to take account of the wider environmental, social and economic impacts, both individual and cumulative, including the impact of the operation of air traffic and radar systems. Recognise the importance of air connectivity in city regional economies and support the growth of both the airport. The safe and efficient operation of the region’s airports is an important aspect to be considered.

Comments welcomed and noted

Section 3.3 is the weakest section of the document and does not fully reflect the Government’s ambitions to move to a low carbon economy. Reference should be made to the UK Low Carbon Transition Plan, the UK Renewable Energy Strategy, the introduction of Feed In Tariffs for small-scale electricity generation from renewable sources, the proposed introduction of Renewable Heat Incentives, Heat and Energy Saving Strategy consultation, funding for a ‘Plugged-In Places’ charging infrastructure for electric cars, the transition to a low carbon way of life is not central to CSRPO then it may be out of date. 1) CSRPO should refer to the provision of infrastructure for electric cars. 2) All houses built in Darlington must be configured to make it cheap and easy to achieve the end results of a ‘deep refurb’: Specifying that all new residential or office buildings must have under-floor heating systems. Specifying that, to the maximum possible extent, all new buildings should have south-facing roof slopes with the optimal pitch for solar water heating or solar photovoltaic panels.

These points are very detailed and require further consideration before detailed responses can be provided.

Generally supportive of CS3 but its implementation may be hindered by the introduction of scale electricity generation from renewable sources, the CSRPO highlighted the north east part of the Borough, which was appropriate given locational factors affecting the deployment of renewable energy. Acknowledge that renewable energy can have significant impacts, which vary depending on the proposal and the context of the site but it will be possible to deliver and exceed current targets for renewable energy whilst respecting environmental, social and economic impacts. The CSRPO highlighted the northeast part of the Borough, which was appropriate given constraints and the RSS areas of search, based on sound evidence. Fig 3.1 re-produces this but Fig 3.2 confuses by indicating three ‘areas of potential least constraint’, which exclude part of the area in Figure 3.1. CS3 and the key diagram both reference 3.2 sometimes referring to ‘areas of search’ and sometimes not; clarification is needed. These are sound reasons not to adopt the additional areas within CS3.

These points are very detailed and require further consideration before detailed responses can be provided.

West and southeast areas are less likely to provide opportunities for commercial scale renewable energy than the original northeastern area. No justification for leaving out areas between the northeast and the west. Key diagram suggests that there are various options for delivery of the renewable energy target, which dilutes the importance of the northeastern area suggesting there is a greater level of choice of location for planning applications than there is. RSS Policy 41 identifies ‘areas of least constraint’, including the Tees Plain which includes the northeast area. The west was not included within an RSS area of search. The ARUP report which informed the Renewable Energy Strategy described the west area as the Gritstone Upland Fringe and Vale, which had less environmental capacity for commercial wind turbines than the Lowland Plain. The Entec report does not provide any evidence to contradict this yet it elevates the west to the status of an area of search, which is flawed. Appreciate that the west could have capacity for smaller developments, either the height of turbines or the number of turbines. Moor House application used a detailed ‘sieve map’ which adds layers of planning and commercial constraints to the map of the Borough and leads detailed areas of search (KOB/2721/P015 attached) using different constraint criteria to Entec including different wind speeds (Entec use above 6 m/s at 45 metres but Banks consider the commercial threshold is 6.5m/s). Appreciate the CS is long term and the threshold may reduce but currently is not realistic. Looked at DECC wind speed data and found there are other areas of the Borough which score more highly than the parts of the potential areas; particularly the areas around Hurworth. Latest wind speed data shows that parts of the west and south drop below 6 m/s. Another constraint are the areas of high landscape value which although is to be replaced by a less delineated CS3 but it would be wrong to rule out wind farms in these locations as it is unlikely that the merits of the landscape which justified its inclusion in the designated area have diminished.

Further consideration of comments required

As new national policy emerges the Core Strategy will be revised where appropriate.

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Renewable energy has a greater impact on the environment than the benefit to climate change. District heating and combined heat and power schemes are old technology tried and tested throughout the world. Wind Turbines are effective machines but can be seen as a dominant neighbour. The generating capacity of large turbines is around 3.5 MW so these systems can only supplement traditional power generations. Ferrybridge generates 1200 megawatts (equals 314 turbines!!) Will CS3 increase the cost of development; the acceptance criteria appear quite high.

Para 3.3.5 'Based on potential visual and landscape impact alone' the north east area of least constraint 'has the potential for more than one development of approximately 4-6 6 wind turbines is on p9 recapping the findings of the Main Study. This is important because the Addendum looks at the visual impact of specific proposals including the Moor House scheme. Scenario 11, looks at the acceptability of existing and approved schemes in conjunction with Moor House demonstrating that Moor House would have impacts that are possibly acceptable and impacts which are likely to be acceptable. The assessment notes that Moor House is likely to avoid a 'severe effect upon sensitive local landscape character over a wide area'. So the indicative capacity of 4-6 turbines can be regarded as superseded.

These points are very detailed and require further consideration before detailed responses can be provided.

Significant adverse impacts should be mitigated prior to development' could be problematical. Ideally it would be possible to mitigate all the impacts of development but when constructing wind turbines to a maximum height of 140m the level of mitigation of the visual impact is likely to be minor. But it is important to show that a process of mitigation has been undertaken with mitigation potential explored.

Note at Fig 3.2 the identification of two potential 'areas of least constraint for wind energy generators' to the south and west of the Borough. It is inappropriate for the boundary of these to extend into adjacent areas including North Yorkshire. Request that particular attention be paid to the cumulative impact of any generators proposed within these areas, particularly in locations close to the boundary where the cumulative impact may also affect neighbouring Districts and areas. Note that para 3.11 refers to the need to take such cumulative impacts into account.

Amend 3.2 accordingly.

These points are very detailed and require further consideration before detailed responses can be provided.

Most wind farms are bladed versions. Given issues made about aesthetics, noise and scale it could be more practical and acceptable to produce Vertical Axis Wind Generators. These are also produced locally. Produce plans for Vertical Axis Wind Generators to be developed on smaller scale industrial sites around Darlington.

CS3 applies to all types of renewable energy including provision of vertical axis wind generators. A plan showing the location of different types of wind turbines would be too detailed for this document. It would be for the developer to consider the most appropriate type of turbine for a particular location and justify that approach in a planning application.
CS3 still suggests that all renewable energy schemes will be supported. Previously commented that only where the assessment findings indicate that there are no significant adverse impacts on a range of criteria should schemes be supported. It is not enough to simply state that significant adverse impacts should be mitigated prior to development. PPS9 states (vi) The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm. In the absence of any such alternatives, local planning authorities should ensure that, before planning permission is granted, adequate mitigation measures are put in place. Where a planning decision would result in significant harm to biodiversity and geological interests, which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused. CS3 should read: The development of commercial scale renewable energy schemes will be subject to a comprehensive assessment detailing its individual and cumulative impact upon: a) the natural environment including national and locally important designated sites, protected species, BAP priority habitats and species, and the historic environment; b) the local landscape and townscape character; c) the amenity of the community including visual amenity, air, dust, noise and/or odour, and recreation and access facilities; d) the operation of air traffic and radar systems. Schemes will be supported in appropriate locations, where the assessment findings indicate no significant adverse impact on the criteria listed above. Where significant adverse impact is identified, avoidance measures should first be considered in the scheme, if none exist, mitigation and/or compensation measures should be incorporated into the scheme. Or, as this last Para may not make provision for refusal of unsuitable developments: Where significant adverse impact is identified, the scheme will only be permitted where these can be avoided, or acceptable mitigation and/or compensation measures and subsequent monitoring and review can be secured in advance of development. CS3 also does not reflect the statement in Para 3.3.15 that 'micro-generation will be encouraged as part of individual developments' or provide any criteria on which to assess such proposals.

Para 3.3.19 Needs to be strengthened to recognise the Arup report recommendations, that this area could only accommodate small to medium scale wind farm developments, being in clusters of no more than 4 to 6 wind turbines, with each site being separated from others by a minimum of 5km to protect the visual and environmental impact on this area with reference to CS14 points ii and iii to protect Tees Lowlands, villages and Conservation areas. As reinforcement to the above requirements that are necessary to protect the visual and environmental impact on this area, we refer you to your proposed planning policy CS14 point ii and iii. This states that the policy’s intention is to protect Tees Lowlands, villages and Conservation areas.

The Banks sieve map assumes that commercial scale turbines will not be acceptable within 500m of residential properties and agree with this aspect of the Entec methodology which limits site selection; the largest unconstrained site with more than 6.5m/s wind speeds is Moor House and even with lower wind speed areas would still be the largest single site. The areas of search overlap with parts of the urban area suggesting that they would be considered for much smaller wind turbines in which case the standoffs would not necessarily apply. Distinction needs to be given to describing these areas and clarity is required as to what size turbines would be considered preferable where. The areas protrude into neighbouring local authorities, which is inappropriate because it implies a level of cross-boundary planning which has not taken place. There are constraints arising from the proximity of the airport but it is not possible to indicate the extent of no-go areas on a plan. There are ‘horizontal surfaces’ in concentric rings around the airport where there is a presumption that various heights of structure will not be permitted. The inner horizontal surface rules out any wind turbine above 45 m in height. The conical surface and the outer horizontal surface could prevent turbines depending on the topography. The Entec report states that no overlaps with the inner horizontal surface. The Banks plan concludes that Moor House is the best site and is critical to the Council meeting its targets but there is scope for other smaller sites and some fall outside the areas of search in Fig 3.2. The key diagram should be amended to highlight the north east of the Borough as the largest opportunity for commercial scale wind generation in the Borough. The southeast area should be amended or removed. This designation would be in conformity with PPS22 paras 1 (v) and 6.

As a rural village community our aim is to undertake all necessary actions to protect this local rural area from overburdened development by successive wind farm applications, which will have a severe negative visual and environmental cumulative impact on the area. Page 24 Para 3.1.13 - It is pleasing to note that the CS states that ‘villages are considered an integral part of making Darlington an attractive place to live’.

These points are very detailed and require further consideration before detailed responses can be provided.

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Pleased to find important points included: consideration of cumulative impact; impact on residential amenity; impact on radar systems. It is important to consider renewable other than wind; small-scale production; energy efficiency and energy conservation.

Comments welcomed and noted

None

Broad aspirations of CS3 are supported but there may be difficulty in achieving a direct link between renewable energy and particular developments. At present there is much uncertainty about the options available, how these can be facilitated within the plan period and how they can be linked to a particular development location. Some flexibility needs to be allowed within the targets proposed. Proposed change: A preferable option would be to target 10% renewables with an increased target of 20% once the means of achieving both the source and the site of renewable energy was more certain.

Comments achieved a minimum of 10% is consistent with the RSS for major developments. CS3 requires strategic locations to provide at least 20% of which as the strategic locations are phased for development from 2016 onwards is considered unreasonable allowing technology to develop. However it would be for the developer to demonstrate that such provision is not viable.

None

Development of renewable energy schemes, taking into account wider environmental, social and economic impacts, and the identification of potential locations for commercial scale renewable energy deployments is consistent with RSS policy 39 and policy 40. On site standard for major developments is consistent with RSS policy 38. Requiring a minimum standard of at least 20% for strategic locations is particularly welcome. The requirement for contributions to be made to a carbon management fund when onsite provision of renewable or low-carbon energy is not viable is welcome and will assist in the achievement of RSS policy 39.

Comments welcome and noted

None

Page 38 Para 3.3.18 The minimum standoff distance must be better defined e.g. the developers involved in the Moor House scheme have recommended that a minimum stand off of 500m from residential houses is acceptable. There is considerable scientific opinion that can prove that this is too small a stand off distance. Scottish Executive policy, many European Countries and the USA recommend a stand off distance from settlements of 2km to negate the effects of noise, shadow, flicker and exterior light interception effects creating repetitive shadows in gardens. CS3 must include a recommended standoff distance from residences of between 1.5km and 2km. It is not acceptable to be silent on the recommended acceptable standoff distances.

These points are very detailed and require further consideration before detailed responses can be provided.

Further consideration of comments required

Both Bishopton and Sadberge are conservation areas and are severely threatened by being overburdened from the successive developments of wind farm applications in the north east of the Borough. CS3 must be strengthened to protect tranquil, local environments from the negative impacts of successive wind farm applications.

These points are very detailed and require further consideration before detailed responses can be provided.

Further consideration of comments required

Welcome inclusion of land on both sides of the A1 (M) on the Western Fringe of Darlington with one of the three ‘Potential Areas of Least Constraint for Wind Energy Generators’ and where medium scale wind turbines may be acceptable. Also welcome the inclusion of references to land “North-west” of the Borough for wind energy. The identification of the suitability of this area for wind power supports the identification of land west of Darlington (Option F in the Draft Core Strategy) as a Strategic Location for residential development. Renewable energy generation within in this area could be brought forward in association with residential development on the western edge of Darlington to create a highly sustainable urban extension.

Noted. Comments regarding residential development in this area dealt with in response to CS10.

See response to comments under CS10.
Para 3.3.5 - As CS3 relies on quotes from the ARUP report then all of the Arup recommendations should be used and not some of them. The Arup report and its addendum both state that to avoid overbearing amenity dominance on the residents, each wind farm should be separated by a minimum of 5km, from all others. This is an important facet of the Arup report and has been omitted from the CS. Illustrate this with the Moorhouse planning application which is vastly greater than the Arup recommendations, they are applying for 10 turbines in total. This is obviously not acceptable. In addition it is far too close to other existing proposals, being within 3km of the A1/Moorhouse wind farm development in the Durham GC area and within 2km of the proposed Newbiggin site. This cannot and will not be acceptable. The CS and CS3 need to be more robust and recognise this issue. Para 3.3.5 misquotes the Arup report; it does not say that this area could accommodate medium to small-scale turbines but that this area could accommodate small-medium small wind farm developments, which were defined as clusters of 4 to 6 turbines. There was no mention of the individual size of the turbines; the commercial reality is that they will all be in excess of 100m tall. The report states that to avoid overbearing amenity dominance for residents, each wind farm development should be separated by a minimum of 5km.

(1) Study is superficial, particularly in relation to wind power and micro-renewable, but biomass is flimsy. (2) Fig 3.2 misrepresents the conclusions of Arup’s reports; the ‘area of least constraint’ does not include the whole of the northeastern part of the Borough. There is a lack of understanding of heat pumps, which casts doubt on the quality of the study. Enter should not have made this mistake. (3) Table 2.2 is unclear. What do the numbers represent? It can’t be the total energy demand in each year, because the numbers for 2010 onwards are lower than the numbers for 2006. Is it incremental energy demand? And from what baseline? Please clarify. (4) P30, the ‘technical potential’ of wind power figures is meaningless. Achieving 423GWh per annum would require 70-80 ‘larger’ wind turbines and 162-356 ‘smaller’ turbines; 132-436 commercial-scale wind turbines in the Borough. The study should have estimated how many wind turbines and what generation capacity would be reasonable for the Borough over the plan period. “Realising just 10 per cent of this potential could meet 8 per cent of the Borough’s electricity supply” is a cop-out. It should state how many wind turbines would be required to generate 423GWh, could the landscape accommodate them and are there issues with the grid infrastructure. (5) P32 “there is definite potential to develop [energy crops] in the Borough, although this will depend on land suitability, economics and the competing demands on land for food production” is stating the obvious. Substantive analysis of the issues and constraints should have been made. (6) District heating schemes overlook the issue of owner occupier household acceptability. It is more straightforward to impose district-heating schemes where the affected properties are Council owned or by housing associations, but restricting district heating to these types of housing would limit its penetration. (7) Why is it “often difficult to locate plants in or close to urban areas”? More detail is required to identify an assessment of the problems and how to overcome them. (8) Micro-renewable omits air source heat pumps. Installing a ground source heat pump requires considerable amount of land (200m2 for a semi-detached house) or an expensive borehole. Air source heat pumps are more suitable for urban environments. (9) Table 3.5 what do the “equivalent number of homes” column mean? (10) Estimating the “technical potential” of micro-renewable is little use. Actual potential of micro-renewable (including air source heat pumps) over the plan period would be useful. Issues and constraints to the output from micro-renewable should be identified. (11) Footnote 21 betrays a fundamental lack of understanding of heat pumps. A heat pump can deliver heating effect of around 3 - 4 times the electrical energy that it uses. The report calculates the CO2 savings by comparing CO2 emissions associated with the electrical energy used by the heat pump with the CO2 emissions associated with providing the equivalent amount of heating via an alternative method.

You have mentioned cumulative impact here and as already stated this would be adequately covered the Arup Report requirements of a minimum separation distance of individual sites of 5km. This recommendation must be adopted as policy.

Note: These points are very detailed and require further consideration before detailed responses can be provided. Further consideration of comments are required.

Welcome the flexible approach to the provision of renewable energy. In trying to make the best use of historic properties, it may not be possible to satisfactorily incorporate energy generating technologies without harming their special qualities, so the ability to contribute in other ways to a carbon management fund would be extremely helpful.

Note: CS2 requires new development to make efficient use of land, existing buildings and improved insulation and resources but accept the introduction of environmental, social and economic impacts referred to in CS3 should include reference to historic assets. Amend supporting text to CS3 to highlight the importance of reducing energy demand. Amend CS3 to include reference to historic assets.

Further consideration of comments are required.
CS4 – Developer Contributions

CSRPO/0023/HA Kyle Maylard Highways Agency N/A Support Particularly supportive of CS4 and the use of developer contributions to secure physical infrastructure improvements which mitigate the impacts of development on the locality. Support the use of planning obligations being sought for major developments where strategic infrastructure is required to mitigate cumulative impacts of multiple developments and welcome the reference in point 11 to strategic highway improvements. Usually only support reference where improvements are based on supporting evidence, which demonstrates its need and deliverability. Consider that the Core Strategy, supporting Local Infrastructure Plan and the consideration given to the Agency/Tees Valley Authorities’ studies, provides a comprehensive evidence base to support the Agency’s infrastructure requirements. Welcome the reference to infrastructure being coordinated and delivered in partnership with other agencies, which is an approach, which the Agency advocates.

Comments welcomed and noted

CSRPO/0058/EA Liz Lightbourne Environment Agency N/A Comment Contamination and remediation of land should be included e.g. site investigation and remediation where other affected land related to the development, contaminated waste works carried out at the development site, monitoring works and maintenance of remedial works.

CSRPO/0032/man Manners Family Manners Family Trust and Manners Farms Ltd Manners Farms Ltd England and Lyle Objection / Comments / Para. No.3.4.13: Planning obligations should be used to mitigate impacts on the natural environment e.g. PPS9. Para 8 states local authorities should use conditions and/or planning obligations to mitigate the harmful aspects of the development and where possible, to ensure the conservation and enhancement of the biodiversity and geological interests; and Para 16 states planning authorities should ensure that these species are protected from the adverse effects of development, where appropriate, by using planning conditions or obligations.

CSRPO/0059/NE Tracy Jones Natural England N/A Objection Para. No.3.4.5/3.4.9: Funding is also provided through Growth Point status for the production and delivery of a green infrastructure strategy, and a number of environmental conditions also have to be met: Ensure that the Green Infrastructure Strategy supports the Durham Heritage Coast, Tees Forest and implementation of the Tees Valley Green Infrastructure Strategy, the Tees Valley Biodiversity Action Plan and the Growth Point Programme of Development.

Comments welcomed and noted

CSRPO/0027/SY Dave McGuire Sport England N/A Support / Objection / Support the recognition that developer contributions should be sought for sport and recreation provision and/ or facilities then, if appropriate, reference will be made to secured funding for identified strategies.

Amend CS4 accordingly

CSRPO/0008/ANEC C. Megginson North East Planning Body N/A Support CS4 includes the provision of affordable and special needs housing, education services, improving accessibility through the provision of sustainable transport options, and the provision or enhancement of public open space and green space. This is consistent with RISS policies 2 and 24. The contribution of planning obligations to a carbon management fund will help deliver RISS policies 39 and 39.

Comments welcomed and noted

CSRPO/0032/man Manners Family Trust and Manners Farms Ltd Manners Farms Ltd England and Lyle Objection / Support / Objection / Support the recognition that developer contributions should be sought for sport and recreation provision and/ or facilities then, if appropriate, reference will be made to secured funding for identified strategies.

Further work is currently being undertaken through an economic viability of housing land study to provide robust evidence to underpin the decision made.

CSRPO/00027/SE Dave McGuire Sport England N/A Support / Objection / Support the recognition that developer contributions should be sought for sport and recreation provision and/ or facilities then, if appropriate, reference will be made to secured funding for identified strategies.

Amend CS4 to reflect comments made.

CS4 sets out details of site related and strategic infrastructure that will be the most common sought in the Borough over the plan period. However CS4 recognises that there will be other matters required to meet the needs of specific developments by stating ‘but not limited to...’ In appropriate circumstances remediation could be sought under the provisions of CS4.

None

None

Amend CS4 accordingly

None

Amend 3.4.5 to make appropriate reference to green infrastructure strategies funded through Growth Point status. No change to 3.4.9.

None

None

None
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<th>Comment</th>
<th>Support</th>
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<td>Villages can be promoted to become tourist attractions, and this should be contained in the LDF. The concept could be to attract visitors by emphasising the facilities for walkers, cyclists and even horse riders. To create this the infrastructure of public foot and cycle paths requires further work. This may entail better definition of the ROW, a cycle and footpath linking Darlington to Hurworth, preferably via South Park to bring the beauty and attractions of South Park more to the forefront. Chartered walks and cycle paths could be marketed. There are a good selection of country inns and restaurants in the villages, but they all need support if they are going to survive. The framework vision should include plans to market these attractions and to improve the infrastructure to allow them to further develop.</td>
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<td>Given the strategic location and size of the Cleveland Street site, elements of open space and potential cycle and pedestrian links are likely to be incorporated into the design and layout. Accept the need for reasonable contributions to be made which should be proportionate to the nature and scale of the proposal. Strongly object to the altered approach taken to developer contributions as set out in CS4 when negotiating any contributions. The approach should be altered to take account of the high remediation costs required to develop sustainable sites in the urban area, which are suitable for residential uses, like the Cleveland Street site. Support the previous approach which sought developer contributions to be negotiated on a site-by-site basis by also using a flexible approach and avoiding onerous requirements. The current approach would stifle the level of sites within the Borough, which are in greatest need of remediation and redevelopment.</td>
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<td>a) Note the reference to a Community Infrastructure Levy or similar scheme, reflecting the need to accommodate a wide range of aspirations from service providers, set against the current less buoyant market conditions and the issues of viability of development proposals in the Borough. Support CS4 which seeks a range and level of planning obligations to take account of the viability of the development, having regard to any additional unforeseen costs and, where appropriate, applying standard charges, tariffs and formulae. Welcome the inclusion of the requirement for employment skills and training opportunities as part of the construction of major new development, consistent with the RES. b) Should recognise and allow for increasing demand for small renewable energy schemes in housing and business premises and should incorporate the need for developer contributions to provide such measures at the development stage in the process. The incorporation of such measures will be enhanced by the feed in tariff powers enabled by the Energy Act 2008 (to be introduced April 2010) which will encourage the uptake of small-scale low carbon energy technologies by providing a financial incentive to use renewable energy (up to 5MW capacity—50 KW for CHP). c) Should require sustainable travel plans to consider the deployment of charging points and wider electric vehicle infrastructure to reflect the NE’s ambition to ensure the region is the first to have comprehensive electric vehicle charging infrastructure. Strategically it would be beneficial for this to be included where a developer contribution would be required to ensure developments incorporate vehicle-charging points as appropriate.</td>
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<td>Support CS4. Comments welcomed and noted.</td>
<td>Support</td>
<td>Objection</td>
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<td>Support the aim to seek contributions for environmental infrastructure. Recommend that a new point be included or alternatively that flood risk reduction is considered as s106 agreements can be used to clarify and establish the appropriate mechanisms for maintenance and/or adoption of Sustainable Urban Drainage Systems (SuDS). Where appropriate, contributions could be made towards a fund to an external provider for SuDS maintenance, provision and implementation of flood alleviation schemes, making space for water, works, improving flood defences consistent with PPS25.</td>
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<td>A list of infrastructure delivery agencies and bodies are set out including the PCT but not the Trust. The Hospital plays an important role for healthcare provision in the Borough and its infrastructure requirements allowing for changing clinical requirements should be included in this list of bodies to be involved in the delivery of requisite infrastructure provision. This would be consistent with PPS12 and would provide further robustness to the CS.</td>
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| Delivery partners will be amended to include the Trust. | | |
CS4 sets out details of site related and strategic infrastructure that will be the most common sought in the Borough over the plan period. However CS4 recognises that there will be other matters required to meet the needs of specific developments by stating 'but not limited to...'. In appropriate circumstances healthcare provision could be sought under the provisions of CS4.

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Support the recognition that developer contributions should be sought for sport and recreation facilities. Amend CS4 to reflect comments made.

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