### CHAPTER SIX – QUALITY HOUSING FOR ALL

**CS10 – New Housing Development**

<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Organisation</th>
<th>Objection</th>
<th>Support</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSRPO/0032/man</td>
<td>Manners Family Trust and Manners Farms Ltd</td>
<td>England and Lyle</td>
<td>None</td>
<td>Support</td>
<td>The publication Core Strategy will be based on updated housing figures available up to 31st March 2010. Agree that the RSS housing requirement is not a ceiling, but note that the poor housing market conditions since late 2007 continuing mean that it is unrealistic to expect housing delivery in the period to 2021 to exceed the RSS requirement. It will be a challenge to deliver the RSS minimum requirement.</td>
</tr>
<tr>
<td>CSRPO/0032/man</td>
<td>Manners Family Trust and Manners Farms Ltd</td>
<td>England and Lyle</td>
<td>None</td>
<td>Objection</td>
<td>Object to the omission from the policy of any reference to the need to provide for higher value lower density (executive) dwellings as part of the overall housing mix in the Borough. The quality of Darlington’s housing, especially at the higher end of the market is a distinctive feature of the town and one that needs to be reinforced if it is to fulfill the various aspirations and roles outlined for it in the Core Strategy Spatial Vision, the Gateway Strategy and the Community Strategy. Whilst development in the Town Centre Fringe and Urban Areas should seek a density of 30-50 dwellings per acre greater flexibility should be encouraged in the strategic locations on the urban fringe to promote the development of an element of lower density executive style housing. This approach should be reflected in Policy CS10. The need for this type of housing in Darlington is already explicitly acknowledged in Paragraph 6.2.9 and its provision is encouraged in Para6.2.16. The land owned by Manners Farms Ltd on the western urban fringe of the town would be ideally placed to deliver this type of housing, if identified as a strategic Location in Policy CS10.</td>
</tr>
<tr>
<td>CSRPO/0042/EH</td>
<td>Alan Hunter</td>
<td>English Heritage</td>
<td>None</td>
<td>Objection</td>
<td>Para. 6.1.121 informs us that as the supply of PDL diminishes, the amount of housing development on Greenfield sites will increase. Figure 6.2 however appears to suggest the opposite. Agree there is a discrepancy. Figure 2 needs to be amended.</td>
</tr>
<tr>
<td>CSRPO/0033/ONE</td>
<td>Wendy Hetherington</td>
<td>One Northeast</td>
<td>None</td>
<td>Support</td>
<td>Endorses the Council’s revised draft policy.</td>
</tr>
<tr>
<td>CSRPO/0042/EH</td>
<td>Alan Hunter</td>
<td>English Heritage</td>
<td>None</td>
<td>Objection</td>
<td>Para 6.1.14 calls for the ‘highest development density possible’ on all allocated sites. This approach runs counter to the principle of designing in context espoused in the Design of New Development SPD, which attaches weight to area characterisation studies responding to local distinctiveness. To clarify, ‘highest development density possible’ is being taken into account the local character and the constraint arising out of other policies.</td>
</tr>
<tr>
<td>CSRPO/0062/MBC</td>
<td>Martin Coleclough</td>
<td>Middlesbrough Borough Council</td>
<td>None</td>
<td>Objection</td>
<td>In addition, the Core Strategy covers the period up to 2026. There is no reference to PDL target for the ten years post 2016. Clarification is sought on the local PDL target for the whole of the plan period. Amend Policy CS10 to set out a local target for PDL by 2016 and for the period 2016-26.</td>
</tr>
<tr>
<td>CSRPO/0062/MBC</td>
<td>Martin Coleclough</td>
<td>Middlesbrough Borough Council</td>
<td>None</td>
<td>Objection</td>
<td>Policy CS10 states that housing delivery will contribute to meeting the regional target for 75% of new housing to be on previously developed land (PDL) by 2016. It is not clear from the current wording whether the 75% is purely the regional target or whether it is also intended to set a local target for Darlington for 75% of housing development to be on PDL. Clarification is, therefore, sought within the Core Strategy of what the local target for Darlington is. Darlington will be contributing towards meeting the regional target of 75% of new housing to be on PDL. The Housing Implementation Strategy indicates that housing delivery will if necessary, be prioritized over achievement of housing completions on PDL, providing this does not adversely impact the Council’s main regeneration objectives. Amend Policy CS10 to set out a local target for PDL by 2016.</td>
</tr>
</tbody>
</table>
Agree with the overall amount of additional housing to be provided, provided this is treated as minimum requirements and not ceilings. Object to identification of the North Western and Eastern Urban Fringes as strategic locations for development; land on the Western Urban Fringe is a more appropriate and sustainable strategic location for residential development and should be included in this policy. Also object to the omission of any reference to the need to provide for higher value lower density (executive) dwellings as part of the overall housing mix in the Borough. The quality of Darlington’s housing, especially at the higher end of the market, is a distinctive feature of the town and one that needs to be reinforced if it is to fulfill the various aspirations and roles outlined for it in the Core Strategy Spatial Vision, the Gateway Strategy and the Community Strategy. Whilst development in the Town Centre Fringe and Urban Areas should seek a density of 30-50 dwellings per acre, greater flexibility should be encouraged in the strategic locations on the urban fringe to promote the development of an element of lower density executive style housing. This approach should be reflected in Policy CS10. The need for this type of housing in Darlington is already explicitly acknowledged in Paragraph 6.2.9 and its provision is encouraged in Para 2.16. The land owned by Manners Farms Ltd on the western urban fringe of the town would be ideally placed to deliver this type of housing, if identified as strategic Location in Policy CS10.

Ability to deliver top end executive housing was considered as one of the factors in selecting the preferred strategic housing locations (see CSRPO Appendix 6). The provision of detached family housing of four or more bedrooms is included as part of the mix for new housing developments in draft Policy CS11. The density range indicated in CS10 has been set to allow for elements of both higher and lower density housing within the strategic locations.

Mr. J.D. Orme & Mr. John Stabler

Would like land allocated for housing at Elm Tree Farm (as shown on map, attached to original letter). Consider its and undeveloped pocket of land which is totally enclosed for development.

It is not the purpose of the Core Strategy to identify specific sites for new development. The site suggested will be assessed as part of the next SHLAA update and will be considered as a potential housing sites in the forthcoming Accommodating Growth DPD – see the Local Development Scheme on the Council’s website for preparation timetable.

Manners Family Trust and Manners Farms Ltd

Fully support the need to identify strategic locations for residential development on Greenfield sites around Darlington but would object to the proposed allocation of land on the North Western and Eastern fringes of the urban area of the town for housing development. They would seek instead, or in addition, the allocation of land on the Western urban fringe for housing development - identified as Option F on Figure 6.1 of the Core Strategy. It is however generally accepted that whichever strategic option(s) is chosen, housing development in these strategic locations will take place post 2016.

See response to comments at CS10.

See response to comments at CS10.
This representation compares and contrasts the two strategic locations for residential development preferred by the Council on the North Western (Option D – 500 dwellings) and Eastern Fringes (Option E South – 200 dwellings) of the town with the alternative strategic location preferred by Manners Farms Ltd on the land against the factors listed in Appendix 6. For the purposes of this assessment we have identified two potential development options in Strategic Location F:• Area 1 - the partial allocation of the whole site for residential development -700+ dwellings 2016-2026 and Eastern Urban Fringes, and suggests this will lead to improved bus services to the west end as a whole. The representation suggests there are practical traffic and transport difficulties with implementing development at the NW and Eastern Urban Fringes. The representation also highlights the opportunities for improving cycling and walking that could be associated with new development at the Western Urban Fringe. It also reiterates the positive findings for the Western Urban Fringe, e.g. potential good access to schools and the local centre, no known infrastructure capacity issues. Suggests Eastern Urban fringe location provides more opportunities to distribute traffic than do the NW and E Urban fringe locations. The representation suggests that as the landowners hold land at the western urban fringe both inside and beyond the A1 (M) and within an area of Least Constraint for wind energy, there is greater potential to Draw Energy from Renewable, decentralised low carbon sources, than the assessment suggests – both wind power and growing biomass crops that could provide heat and power to new dwellings. The representation also argues that extensive landscaping along western fringe that could be provided with new development would enhance ‘tree canopy’ skyline of the town in line with Policy CS14 and provide the opportunity enhance recreational and biodiversity of Baydale Beck corridor. In light of the above the representation suggests that Option F offers the best, most sustainable, and developable urban fringe site and should be allocated as a strategic location for residential development in the Core Strategy. The scale of this allocation will need to be the subject of further consultation. The Area 1 option involving the whole Option F area will meet all projected strategic housing need for the town to 2026 and potentially beyond but offers significant advantages over the current preferred options in terms of impact on the road network, marketability, promoting local distinctiveness, delivering renewable energy options and providing enhanced recreational opportunities. Development on the smaller Area 2 offers many of the same advantages but would need to be accompanied by the allocation on one of other preferred Strategic Options in order to ensure the delivery of the required amount of housing in the Borough. The principal flaw in the proposed allocation of the land on the North Western urban fringe as a strategic location for a further 500 dwellings is its impact on traffic generation and congestion on the road network on that side of town. Existing congestion in this area is already at unacceptable levels especially during rush hours at a time when existing consents for residential and employment developments in this area are far from complete. A further 500 dwellings would be unacceptable in this context. The principal flaws with the preferred strategic location on the Eastern Urban fringe is its remoteness from community facilities and other development, and its poor marketability. On this basis Option F - land on the Western fringe of Darlington should be included within Policies CS1 and CS10 as a preferred strategic location for residential development. Consistency with and support for the RSS noted. The number of new dwellings planned for is consistent with RSS policy 28. The priority given to Darlington urban area and the town centre fringe for development followed by urban fringe locations is consistent with RSS policy 29 and Policy 4. The average housing densities across the borough are consistent with RSS policy 29, although the NEPB would welcome criteria to define circumstances where provision of lower densities is needed to better provide for future households with a mix of dwelling types and sizes. Overall the policy helps to deliver the sustainability objectives of RSS policies 2, 10 and 24, and supports the strategic location strategy of policy 6.

Comments noted. Further dialogue with the Highways Agency will be undertaken to resolve any outstanding concerns. Depends on outcome of further dialogue.

Council has commissioned further ‘transport action area plan’ work to establish what transport and travel solutions will be required to accommodate all the new development proposed for the NW Urban Fringe in the 2016-2026 dwellings. The representation options will need to be reviewed if deliverable solutions not possible. The findings of the Connections Study and advice from the Council’s Highways section has informed work to date. Representation relies on anecdotal information rather than hard data. – The 250 units proposed at the Eastern Urban fringe would only be the first phase of a wider post 2026 development. – Comments about public transport access noted. However, potential benefits offset by remoteness from places of employment compared to NW and E urban fringes. – Whilst close to schools, Appendix 6 makes it clear that there is limited capacity in existing schools in this area. – The inclusion of the North west Urban fringe as a location for new housing development would not lead to an overconcentration of new housing – the town centre fringe, main urban area and eastern urban fringe will provide a range and choice of locations overall.

The inclusion of the North west Urban fringe as a location for new housing development would not lead to an overconcentration of new housing – the town centre fringe, main urban area and eastern urban fringe will provide a range and choice of locations overall. Consistency will be given to an additional sentence setting out the circumstances where lower densities would be acceptable.
The development of the Cleveland Street site would make a significant contribution to the housing requirements of both the Borough and the wider sub-region. It is a concern that the revised housing figures no longer take account of the uplift in housing figures encouraged by the Growth Point Status. However, of greater concern is the fact that no allocations are proposed to come forward in the first period of the plan (2011-16) and the Council intend to rely on existing commitments to deliver the housing figures during this period. Our client strongly disagrees with this approach. Sustainable sites in the “Darlington Urban Area” which are suitable, available, and deliverable should not be held back and should be brought forward during the first plan period or some provision should be made within the policy for windfall. The overrelance on existing commitments to deliver the housing numbers during the first plan period does not represent a robust and flexible supply of future housing. The deliverability of completions at the level proposed sites on committed sites is questionable, particularly at Central Park and Lingfield Point. Central Park has also remained a commitment for sometime without coming forward. In general, our client fully supports the sequential approach to development in accordance with RSS policy 4 and that delivery of the housing figures should be focused on the locations in Darlington’s Urban Area. However, as outlined above, provision should be made for the delivery of suitable, available, and achievable sites, in accordance with the sequential approach, in the first phase of the plan period. Our client supports the target of 75% of all new development to be built on previously developed land. They are pleased that the preferred policy option has sought to adopt this deliverable target for development on previously developed land and the Cleveland Street site, which is entirely previously developed, presents an ideal opportunity to assist in achieving this. In terms of density, our clients support the Council’s aspirations for an average density of 30-50 dwellings per hectare overall. However, in respect of the Cleveland Street site we would consider that a higher density could be achieved utilising the sustainable location of the site. Higher densities are encouraged in draft policy CS10 around district and local centres. The Cleveland Street site is within 250 metres of North Road Local Centre.

Comments

The existing commitment data comes from the SHLAA, which is considered robust and credible, and was agreed by a steering group including house builder and landowner and RSL representatives. Will consider amending policy to ensure flexibility in delivery, along the lines suggested.

Wording into CS10 to improve the deliverability of the policy to respond to changing circumstances.

The existing commitment data comes from the SHLAA, which is considered robust and credible, and was agreed by a steering group including house builder and landowner and RSL representatives. Will consider amending policy to ensure flexibility in delivery, along the lines suggested.

Noted. As it stands, the policy needs to be read in conjunction with the Housing Implementation Strategy, which appeared at Appendix 7 of the LDF consultation. CSRPO and provides much of the detail on this. An additional clause will be drafted for inclusion in the policy.

It is not the purpose of the Core Strategy to identify specific sites for new development; that will not be done through the Strategic Growth DPD, which will be informed by the details provided about this and other sites through the SHLAA process and new information provided during LDF consultations such as this.

None
Further consideration will be given to ensuring a further change to CS10 is likely to be that the policy is flexible enough to ensure that housing delivery can be maintained throughout the plan period, if development does not come forward as envisaged.

To clarify, overall means within the Borough. Other comments noted.

Note. There are no strategic locations for new housing identified in the Core Strategy. Individual site allocations will be made through the forthcoming Accommodating Growth DPD.

Updated information noted and will be reflected in SHLAA evidence base. Welcome continuing communication, particularly as work on the forthcoming Accommodating Growth DPD progresses, where sites will be identified, and more detail on site-specific requirements given.

None

No change proposed in response to this comment, though housing numbers may change fin CS10 from the CSRPO version, as the housing completions/commitments data is brought up to date, to 31st March 2010.

None

Note, other than to correct the typographical error.

None

Note.
Mr. Steve Wharton
Northumbrian Water Limited
England and Lyle

Comment
Preferred policy CS10 plans for about 350 new houses per year until 2014 and 250 and 400 thereafter, with the Darlington Urban Area, Town Centre Fringe, North Western Urban Fringe and Eastern Urban Fringe being strategic locations for new housing. Along with existing commitments in these areas, this will result in net additions to housing in 2010 to 2026 totaling approximately 7,202 dwellings – based on the assumption that the “15021” net additions in Darlington Urban Area in 2021-2026 is a discrepancy/typo error (N.B. NWL would request that the Council confirms this at the earliest opportunity and specifies the correct figure). As with the NWL's comments on Policy CS1 (above), NWL is carrying out major investment in the Stesslohom Sewage Treatment Works (STW) that will address quality and growth issues and work is due to be completed in 2010. Growth has been allowed for following consultations with, amongst other parties, local planning authorities. The planned growth over the LDF plan period to 2021 is a significant increase and at first assessment would exceed the planned capacity of the STW. A detailed growth assessment would be required against the capacity allowed for in current scheme to include all factors such as migration, household size, and employment development. Early consultations with Darlington Council would be welcomed to ensure NWL's investment programme provides for adequate infrastructure capacity over the LDF plan period.

No change in response to this comment. Consideration is being given to additional policy and/or text to give some certainty for further development beyond 2026 to ensure that critical mass of development is achieved in this location to support sustainable provision of local services.

Timothy Wheeler
Ward Hadaway
N/A
Support
Broadly support approach in Section 6. Agree with identification of southern part of the Eastern Urban Fringe Area (which for convenience I will go on to refer to as SEUFA). It has major potential to provide for a significant part of the future housing development needs of Darlington. Sets out key attributes of the area - single attributes of the development process and facilitating the benefits outlined below:- Proximity to the ETC, affording good access to both the town centre and associated services and also to the A66 for access to Tees Valley, DTVA and the A1 motorway. Potential to complement proposals for Lingfield point and for land immediately to the south of the ETC. - Scope to deliver a significant principally residential development with adequate ‘critical mass’ (in terms of the development value and number of dwellings) to help facilitate the development of appropriate community facilities (in a similar fashion to that which has been achieved at Darlington West Park). - The opportunity to simply extend, the development of high quality public transport services serving the eastern area of the town. - The potential space to deliver renewable energy and consider a District Heating System. - The opportunity to create an attractive new landscape and habitat at a key gateway to Darlington from the east. - If the CS exercise can create some confidence in the future of the area, then it should enable the delivery of advance structural planting prior development. Potential to deliver a broad range of housing types, from executive to affordable family housing and elderly people's accommodation. - Potential to develop Green Infrastructure, including the further development of the adjoining part of the Skerne Valley as a recreational and habitat resource, providing opportunities for healthy living, and a more sustainable environment.

Note reasons for ranking the SEUFA at a lesser level in terms of deliverability to the NWUFA. These relate to the highway capacity issue of the A66 and in particular the dualling of the section north of the Yarm Road junction and the Improvements to the Great Burdon roundabout. Appreciate that the delivery of these improvements are outside the control of the Council and that the Council has been pursuing this matter fairly vigorously with the HA through initiatives such as the Connections Study. Consider that work should continue to secure the implementation of the A66 dualling within an earlier timeframe than that envisaged presently in the LIP and CS19. Ongoing consultation with the Highways Agency will continue to identify the most appropriate timeframe for implementation of any works to the strategic highways network.

CS11 – Meeting Housing Needs

Our client recognises the need to achieve a balanced housing stock that better meets local housing needs and aspirations. In terms of affordable housing, our client supports the notion that provision should be negotiated with developers based on up to date evidence of housing needs and provision. The Cleveland Street site presents the opportunity to improve the Borough’s scale and mix of housing types and tenures to meet the principles of draft policy CS11.

Note: Specific sites are an issue for the forthcoming site allocations Accommodating Growth DPD to address.

Mr. Steve Wharton
Northumbrian Water Limited
England and Lyle

Note: The 15021 are a typing error and should N/A

To be determined, following the meeting with NWL.

Mr. Steve Wharton
Northumbrian Water Limited
England and Lyle

Note: The 15021 are a typing error and should N/A

To be determined, following the meeting with NWL.

Mr. Steve Wharton
Northumbrian Water Limited
England and Lyle

Note: The 15021 are a typing error and should N/A

To be determined, following the meeting with NWL.
Revised Draft Policy CS11 refers to new housing and the conversion and adaption of existing dwellings. I am unclear as to whether the conversion of non-residential buildings to dwellings is included in the former or not. Clarification would be helpful. New housing would include the conversion of non-residential buildings to dwellings.

No change proposed, but clarification would be helpful.

No change proposed, but clarification could be provided in the reasoned justification.

Most older people will continue to live in existing housing, so the provision of suitable new housing is only a small element of addressing the issue overall. The council’s Housing Strategy is the main policy document where this issue will be tackled.

Change CS12 to read North Road/Northgate.

An economic viability of land study is underway and will inform finalising Policy CS11 and the forthcoming Planning Obligations SPD. The areas of need were identified in the 2005 Local Housing Assessment and confirmed in the 2009 Tees Valley SHMA.

Changes may be made to CS11 following the outcome of the economic viability of housing land study.

An economic viability of land study is underway and will inform finalising Policy CS11 and the forthcoming Planning Obligations SPD. The areas of need were identified in the 2005 Local Housing Assessment and confirmed in the 2009 Tees Valley SHMA.

A balanced housing stock is one where the range and choice matches needs and aspirations. The definition of affordable housing is set out in Annex B of PPS3. There are various financial mechanisms for providing affordable housing – through Section 106 agreements is the most common. Affordable housing reduces inequality. Some house builders report lower house prices for market housing on sites with a mix of private and affordable housing. The economic viability of housing land study will test whether the affordable housing targets are viable; if they are not, they will be adjusted so they are.

A change to the affordable housing targets may be necessary, following receipt of findings of the economic viability of housing land study.

Page 77 CS11 Housing needs: What is an overall balanced housing stock? How is affordable housing defined? What is the financial mechanism to provide affordable housing? Does the provision of affordable housing discriminate against those who have paid market prices, does this mix affect house pricing in adjacent properties. Again, if we wish developers to keep building houses within market costs “negotiation “of the policy is paramount

An economic viability of land study is underway and will inform finalising Policy CS11 and the forthcoming Planning Obligations SPD. The areas of need were identified in the 2005 Local Housing Assessment and confirmed in the 2009 Tees Valley SHMA.

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Welcome requirement to provide an appropriate mix of housing to meet identified shortfalls of dwelling types, sizes and tenures within the Borough; the specific inclusion of large family housing within the specified categories is particularly important. It is noted that the Council is currently reviewing its targets for affordable housing and that work will inform the finalisation of Policy C11 for submission to Independent Examination.

Noted. The Council has commissioned Level 3 to undertake an assessment of the economic viability of housing land, using up to date evidence and data. Work by the consultants will inform the preparation of viable affordable housing targets in the publication version of the Core Strategy.

The strategy does not address the need for lifetime homes.

The strategy includes provision of housing for older people, including housing capable of being readily adapted to meet a range of needs. Para 6.2.14 of the Revised Preferred Options explained the approach.

The second part of this policy relates to a potential for possible demolition. Does this relate only to large housing regeneration developments? Is it relevant to individual buildings? There have been occasions where a developer has considered it more costly and time-consuming to demolish a building and build new as this was a more profitable route than conversion. Darlington has many large, old houses, which are not listed, but which are an important part of their locality. These require protection from proposals to demolish and rebuild because that is a more profitable exercise. In some areas of the country it is understood organisations have bought up property capable of refurbishment / renovation and then specifically allowed it to become rundown so they can demolish and ‘regenerate’ the area. Is it possible to word a policy to discourage this?

The policy was drafted with areas in mind, rather than individual properties. The Council’s Urban Design and Conservation team is planning to establish a list of buildings of local interest and once completed, these will be protected by Policy CS14 – see part (k), and would guard against the scenario suggested.

Policy CS12 – vacancy rate is consistent with RSS policies 28a and 29.4a. The improvement and reuse of the existing housing stock is consistent with the sustainability, climate change and energy efficiency objectives of RSS policies 2, 3, 24 and 38.

The revised draft policy did particularly include improving energy efficiency in repairing, adapting and remodeling existing housing CS12 (ii) refers). Decent Homes standards stipulates minimum levels of “thermal comfort” to be achieved through improvement or refurbishment works. The Private Sector Housing Team has a regulatory role within the privately rented and owner occupied sector to ensure these standards are maintained. The Authority has invested in cavity wall and loft insulation works across the Borough as these specific elements contribute to the highest degree of heat loss from domestic homes. In addition, the Authority are part of a partnership with the Primary Care Trust and the Voluntary Sector providing a dedicated HEAT Advisor offering advice on energy efficiency matters, fuel switching, heating improvements and access to grant funding via Government funded initiatives such as Warm Front.

With reference to potential “selective demolition and redevelopment” in future housing regeneration strategy, NWL would request that any development briefs or master plans for the redevelopment of these areas should make explicit reference to ensuring that opportunities for Sustainable Drainage Systems are maximized in regeneration projects.

With PAGE 81 CS12 Existing Housing: What is the cost of a 3½% vacancy? Is the Darlington standard excessive, do we pay more to achieve this?

It is difficult to quantify the costs of vacancies in the housing stock – they are environmental and social as well as monetary. Also 2-3% vacancies are considered desirable to allow for turnover and the operation of the second hand housing market. It may cost more to provide the Darlington Standard than a standard house in the short term, but over the long term, there would be cost savings, as the Council should have fewer and cheaper adaptations to fund, to help people to continue to live in their own homes.
<table>
<thead>
<tr>
<th>Comment / Query</th>
<th>None</th>
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<tbody>
<tr>
<td>Can some attention be given to addressing the REAL causes of vacancy levels and decline in housing quality in areas of older housing? There is nothing wrong with the houses - its their treatment and use that is the problem! It would be only too easy for whole areas of such housing to be deliberately run down so that this policy of demolition can be enacted. Demolition should be avoided at all costs because of Affect on climate change. Social upheaval of long-term residents.</td>
<td>None</td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>Support / Comment</th>
<th>None</th>
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<tbody>
<tr>
<td>Welcomes the thrust of this policy, but would suggest that in respect of © repair, adaptation and remodelling, be ruled out only if it is economically non-viable or unsustainable. This suggested change would clarify this section of policy</td>
<td>None</td>
</tr>
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<thead>
<tr>
<th>Support Noted</th>
<th>None</th>
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</thead>
<tbody>
<tr>
<td>Welcomes the statement in Para 6.3.2 that existing housing will continue to be the cornerstone of the Borough's housing offer.</td>
<td>None</td>
</tr>
</tbody>
</table>
The aim is to keep vacancy levels to 3%. Table 6.5 shows that private stock vacancy rate of 4.4 is what is adversely affecting achievement of this target. The lack of comparable controls and standards between RSLs and Private landlords is non-existent. There is no parity. This has created inequality between the communities of older housing (Northgate/North Road/Bank Top/Central). Housing and support standards are incomparable between the two AND populations move about more affecting community stability, which has a knock on effect to existing residents and affects environmental quality. The Sustainable Community Strategy aim that no one should be disadvantaged by where they live needs to be addressed. There is huge inequality between Social Landlord properties/communities and private landlords. Private rented housing is the poor relation in terms of quality for tenants, which will be exacerbated by the emphasis on bringing DBC social housing up to the Darlington Standard. In the short the inequality is grotesque. Private Sector landlords have no interest in investing their profits in their properties (not homes) nor in their communities in comparison with RSLs. In addition the quality of their ‘investment’ in their houses will be minimal to meet required standards in comparison with those in private ownership. So, the RSLs continuously upgrade their property and support their communities; in comparison the private sector where profit is the only motivator and investment in upgrading property above minimum standards and support communities is non-existent. The private rented market leads to housing market failure, not the perception that older terraces are substandard and inadequate. A great many people I have spoken to do not wish to live in modern homes – small, cramped and poorly built.

The RSS requires Local authorities to assess and monitor the housing needs of Gypsies and Travellers and Travelling Show people and that LDF documents should provide for a need, where this is identified. The policy provides criteria based approach to the provision and release of pitches, however, the need that is identified through further work, will be addressed through the Accommodating Growth DPD.

CS13 will be amended accordingly
<table>
<thead>
<tr>
<th>Case Ref</th>
<th>Name</th>
<th>Organisation</th>
<th>Type</th>
<th>Date</th>
<th>Comment Type</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSRPO/0008/ANEC</td>
<td>C. Megginson</td>
<td>North East Planning Body</td>
<td>Support and Comment</td>
<td>N/A</td>
<td>Policy CS13 identifies a number of sites to accommodate travelling groups, and sets criteria as to how, if required, additional sites will be allocated, and sets out a sequential approach to development. This is consistent with RSS policy 30. As stated in the RSS, the NEPB would welcome collaboration with neighbouring authorities to fully understand patterns of need and adequacy of provision. As highlighted in previous responses, consideration should be given to the Gypsy and Travellers Accommodation Assessment, which were commissioned by the North East Assembly.</td>
<td></td>
</tr>
<tr>
<td>CSRPO/0059/NE</td>
<td>Tracy Jones</td>
<td>Natural England</td>
<td>Objection</td>
<td>N/A</td>
<td>Criterion (b) should more correctly refer to landscape character. It is not clear what is meant by landscape amenity.</td>
<td></td>
</tr>
<tr>
<td>CSRPO/0042/EH</td>
<td>Alan Hunter</td>
<td>English Heritage</td>
<td>Objection</td>
<td>N/A</td>
<td>English Heritage supports revised draft policy CS13 but would advocate the use of the word 'unacceptable' rather than 'significant' in CS13 ©.</td>
<td></td>
</tr>
<tr>
<td>CSRPO/0019/CPRE</td>
<td>Gillan Gibson</td>
<td>CPRE Darlington District Committee</td>
<td>Query / Objection</td>
<td>N/A</td>
<td>Will new sites be permitted outside the development limits? The 'adjacent to existing settlements' could be interpreted as saying this. CPRE objects to this possibility and wishes to see a clear statement that sites are to be within the development limits. This is particularly important in view of the pressure for residential caravans and related facilities to the south of the Darlington urban area. National circulars advise that in certain circumstances, sites outside of existing settlements, may be acceptable subject to the necessary controls and lack of harm to rural settings and the nearest settled community. The policy cannot presume against Gypsy sites outside of development limits / adjacent to existing settlements, however, it does give preference first to locations within and then adjacent to existing settlements, and then to the re-use of brownfield land in other locations. As this is a strategic level document, it does not go to the level of detail of identifying specific sites, which will take place through the Accommodating Growth DPD.</td>
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None