

Reference	Name	Organisation	Agent organisation	Type of representation	Comments (incl Para numbers)	Officer comments	Proposed changes	
<b>CHAPTER SIX – QUALITY HOUSING FOR ALL CS10 – New Housing Development</b>								
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Support / Comment	Support the Council's assessment of the overall housing requirement for the Borough 2011-2026. It is noted that net completion figures for the period 2009-2011 are necessarily estimated and that these figures can be updated when full counts become available. As a result we would reserve our position to reexamine these figures in the light of more up to date evidence as the Core Strategy evolves. Also point out that the RSS net additional housing requirement figures are a minimum requirement for the number of new dwellings that have to be fully delivered within the plan period in the Borough and are not a ceiling. It would be prudent therefore for the Council to plan on this basis and make sufficient allocations of deliverable and developable sites through its LDF to ensure that this target is met. This will inevitably involve an element of over-allocation through the LDF. Failure to do so will put in jeopardy the wider social and economic objectives of the plan. For example they consider that whilst the 'Outstanding net additional dwellings required' figure in Table 6.2 is given as 2602 dwellings this should be treated as an absolute minimum.	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 and 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.	The housing figures in CS10, and Tables 6.1 and 6.2 will need to be subject to minor changes to reflect the most up to date figures available (March 2010).	
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Objection	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.	Draft Policy CS11 includes reference to 'detached family housing containing four or more bedrooms in all appropriate locations'. Top end executive housing would fit within this definition. More detail on suitable locations would be given in the Accommodating Growth DPD. 'Executive style' housing is not a category that would be recognized in the LDF.	None	
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	Para. 6.1.21 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.	Amend Figure 2 or equivalent for publication document.	
CSRPO/0033/ONE	Wendy Hetherington	One Northeast	N/A	Support	Endorses the Council's revised draft policy.	Noted	None	
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	Para 6.1.14 calls for the 'highest development density possible' on all allocated sites. This approach runs counter to the principles 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 taking into account the local character and the constraint arising out of other policies.	None	
CSRPO/0062/MBC	Martin Coleclough	Middlesbrough Council	Borough	N/A	Objection	In addition, the Core Strategy covers the period up to 2026. There is no reference to a 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.	Amend Policy CS10 to set out a local target for PDL by 2016
CSRPO/0062/MBC	Martin Coleclough	Middlesbrough Council	Borough	N/A	Objection	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.	None

CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Objection	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 Paragraph 6.2.16. 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.	None
CSRPO/0012/ETF	Mr. J.D.Orme & Mr. John Stabler	N/A	N/A	Comment	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.	None
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Objection	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.

CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Objection	<p>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 suggested Manners Farms Ltd of land on the Western Fringe (Option F) of the urban area 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 allocation of the whole site for residential development -700+ dwellings 2016-2026 with potential capacity for development post 2026. • Area 2- partial allocation of land at northern end for 400 dwellings 2016The representation highlights the better potential for public transport access to land at Option F, compared to the NW 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 consideration .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 include within Policies CS1 and CS10 as a preferred strategic location for residential development.</p>	<p>– Capacity on West Auckland Road; the 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 Revised Preferred Options document. Preferred 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 so far. Representation relies on anecdotal information rather than hard data. – The 200 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 or no 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.</p>	<p>Any changes to strategic locations would depend on findings of ongoing 'transport area action plan' work. Make change to text before CS10 to indicate that the 200 new houses at the Eastern Urban Fringe would be the first phase of an 800+ area new neighbourhood.</p>
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support / Comments	<p>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.</p>	<p>Consistency with and support for the RSS noted.</p>	<p>Consideration will be given to an additional sentence setting out the circumstances where lower densities would be acceptable</p>
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Support / Comment	<p>Generally support the strategy for locating housing development, but concerned about the location the new housing development and potential impact on the operation of the SRN. In relation to the specific locations proposed for housing development, it is considered that all residential proposals have been fully considered as part of the studies being undertaken by the Agency and the Tees Valley Authorities (including the Area Action Plan for the A66/A19/A174 and Tees Valley City Region: Connectivity and Accessibility Study), although the latest update of the evidence base which supports the Area Action Plan should be fully considered. The Agency would wish to continue to be fully involved as each of the sites is advanced.</p>	<p>Comments noted. Further dialogue with the Highways Agency will be undertaken to resolve any outstanding concerns.</p>	<p>Depends on outcome of further dialogue.</p>

CSRPO/0014/WB&BP	Ward Bros and Baydale Properties	Ward Bros and Baydale Properties	England & Lyle	Comments	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 figure 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 of 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 overreliance on existing commitments to deliver the housing numbers during the first plan period is 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 6 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.	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 flexibility of the policy to respond to changing circumstances.
CSRPO/0024/BA	Tony Cooper	Bussey and Armstrong	N/A	Support / Comment	We agree with the sequential approach to allocation of sites for new housing prioritising brownfield locations. We consider there should be some flexibility in the approach to allocations specifically as brownfield sites have historically been more difficult to make viable and will become more so with increasing demands of legislation (sustainability, infrastructure, open space). We appreciate that the target figures will be monitored annually through the SHLAA process however strategic sites will require advance notice to enable planning for infrastructure.	Noted. As it stands, the policy needs to be read in conjunction with the Housing Implementation Strategy, which appeared at Appendix 7 of the CSRPO and provides much of the detail on this. However, additional wording in the policy and reasoned justification would help to highlight and strengthen this link.	An additional clause will be drafted for inclusion in the policy.
CSRPO/0014/WB&BP	Ward Bros and Baydale Properties	Ward Bros and Baydale Properties	England & Lyle	Comments	On behalf of our clients Ward Bros (Steel) and Baydale Properties, England & Lyle take this opportunity at this Revised Preferred Options consultation stage of the Core Strategy to put forward a major residential development opportunity within Darlington's main urban area at Albert Hill. These representations follow previous submissions in respect of the Ward Bros (Steel) and Green Street Motors site at the Core Strategy Issues and Options stage, Preferred Options stage and the recent Strategic Housing Land Availability Assessment consultation. The location of the development opportunity is shown on the plan contained at Appendix 1. The site forms a large, irregular shaped area bound by the East Coast Mainline to the east and the River Skerne site to the west. To the north of the site is Cleveland Street itself with the Bishop Auckland branch line railway line to the south. The site is currently accessed from various points on Cleveland Street. The Cleveland Street site is currently in the ownership of two landowners. A large area of the site is currently used as a scrap metal recovery facility. Our client, who owns this part of the site is seeking to relocate this existing facility to new, modernised premises on the north side of Cleveland Street. A planning application has been approved for the relocation of the exiting scrap metal recovery facility to the former Alexander Le Skerne site subject to the signing of a legal agreement (ref: 08/00429/CU). The smaller part of the site closest to the River Skerne is currently occupied by a garage and car scrap yard. These existing uses will also be relocated in due course. 2 The relocation of both our client's businesses presents an opportunity to reconsider the land uses in this area and deliver the redevelopment of a prime site close to the town centre. The two landowners are committed to working together to realise the major development opportunity that exists, and which they consider to present the most suitable and viable future use for the Cleveland Street site. In total, the land measures approximately 7.8 hectares and could potentially yield up to 350 dwellings if a mix of dwellings types is considered appropriate.	It is not the purpose of the Core Strategy to identify specific sites for new development; that will be done through the Accommodating 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

CSRPO/0021/PSM	Richard Cook	Persimmon Home	N/A	Comment	The need for flexibility in the approach / policy regarding both housing allocations and delivery should those sites identified in the strategic locations and existing commitments not deliver housing numbers as envisaged in Policy CS10. Recommended changes: Insert in Para 6.1.23...in the middle to latter parts of the plan period * or on deliverable allocated sites subject to the flexible delivery mechanism expressed in the revised draft policy CS10. Include following text: In the event that a five year supply from categories a to d falls short of the plan trajectory set out in table 6.2 of this strategy the council will look favorably upon applications to develop the housing allocation sites which are demonstrably deliverable at that time and which least prejudice the prospects of implementation of sites in categories a to d.	Further consideration will be given to ensuring 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.	A further change to CS10 is likely to be required.
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Comment / query	CPRE is pleased to find existing, but unbuilt permissions are included in the calculations for number of houses Darlington is able to deliver. Average housing density - does the 'overall' inline 2 of the final paragraph mean 'overall' in the borough of Darlington or 'overall' within a particular development? We would support the former and object to the latter interpretation. This matter should be clarified. Whilst a high density overall across the borough is desirable there are places where low density is appropriate, for example in the west end of Darlington, or when building the executive, high quality housing required to ensure a mix of property types which will draw in business executives. Heed should be taken of the existing housing density of an area and 'town cramming' prevented.	To clarify, overall means within the Borough. Other comments noted.	None
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Objection	Highlighted in our previous response to CS10, there is a need to undertake the Sequential Test for the proposed residential development located within Flood Zone 2 and 3 areas. The risk is that sites may not be deliverable if the flood risk is unacceptable for residential development. These issues need to be considered at the earliest stage. Sustainability Appraisal highlights mitigation measures to consider measures to alleviate the level of flood risk. This should be considered after the Sequential Test has been undertaken to determine if it is a suitable and sustainable location.	Noted. A Core Strategy Sequential Test assessment will be prepared to underpin the submission Core Strategy.	None
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Comment	The parish has already over 1600 houses and the residents are emphatic that there should be no further development of houses.	Noted. 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.	None
CSRPO/0003/Cjo	Charles Johnson	DBC (Councillor)	N/A	Query	Page 71 CS10 Housing Based on RSS, which is not necessarily in the best interests of Darlington. Opposition political party has indicated RSS may be removed. Should define how higher housing densities will be achieved.	It is a requirement of producing LDFs that they are in general conformity with the RSS, and the document has to be prepared on the basis of the policy framework currently in place. The Council's recently adopted Design of New Development SPD sets out guidelines about how high densities of housing can be achieved in appropriate locations, without detracting from Darlington's distinctive character.	None
CSRPO/0048/WARD	Timothy Wheeler	Ward Hadaway	N/A	Comment	We note within Appendix 6 that the marketability of the SEUFA is stated as unknown. We can confirm that our client is actively marketing the site at the present time and we anticipate a strong level of interest from the development industry. We would be happy to keep the Council apprised of progress in this exercise and related matters such as the potential to liaise on the appropriate master planning work.	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
CSRPO/0048/WARD	Timothy Wheeler	Ward Hadaway	N/A	Comments / Objection	The proposed monitoring arrangements will be important to the deliverability of new housing development during the plan period. Whilst we obviously welcome the identification of 200 units within the SEUFA post 2021, we consider it probable that at least these units will be required during the medium (2016 - 21) timeframe of the plan period, with further numbers during the post 2021 period.	The housing trajectory, which is based on robust, credible and up to date information about housing coming forward indicates that there is sufficient new housing coming forward to meet RSS requirements in the period to 2021 without resorting to the use of the Eastern Urban Fringe Greenfield area.	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.
CSRPO/0050/TESCO	N/A	Tesco Stores Limited	Development Planning Partnership	Objection	There is committed development of another 400 units on West Park 2011-16 and a further 600 units have been allocated for the North Western Urban Fringe from 2016-26. Overall from 2016-26 17,000 new residential units are required by this policy not including the Borough's existing commitments of 3,550 units from 2011-26. Although there is little retail capacity identified the Council's aspirations for housing growth adds weight to the case for designation of a district centre with another food store capable of serving main shopping trips.	The respondents' calculation of '17,000' new dwellings is based on a typographical error in CS10, which will be corrected in the final Core Strategy. Growth in the area will be considerably less than that and is reflected in the provisions of preferred Policy CS9, which proposes to designate the existing 'village centre' at West Park as a local centre.	None, other than to correct the typographical error.
CSRPO/0052/LDPC	I Murphy (Clerk)	Low Dinsdale Parish Council	N/A	Support	The Parish concurs with the view that a low priority is given for new housing development in larger villages.	Support noted	None

CSRPO/0037/NWL	Mr. Steve Wharton	Northumbrian Water Limited	England and Lyle	Comment	Preferred policy CS10 plans for about 350 new houses per year until 2016 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 Stressholme 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.	Noted. The 15021 are a typing error and should read 150. These issues will be discussed in a meeting with NWL.	To be determined, following the outcome of meeting with NWL.
CSRPO/0048/WARD	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 ownership simplifying 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.	Noted	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.
CSRPO/0044/SFM	Susan Moore	Tidler-Resident	N/A	Objection	If 600 more houses built on West Park, how can the already overcrowded Alderman Leach School cope with the extra demand? What provision will be put in place? The infrastructure around West Auckland Road, A1, Rotary Way cannot cope now with volume. What alternative highways are being considered to deal with the resident's issues, i.e. new A1 exit to Blackwell? Residents are most concerned with noise and pollution from lorries -this is ongoing now, what is being done? Quality of life has declined significantly.	Significant additional housing at West Park would give rise to the requirement for an additional primary school, and further nursery provision. About 800-900 dwellings are required to support a new primary school. Further work is being undertaken to establish what needs to be done to ensure that the new traffic generated by new development does not cause an unacceptable impact on local amenity and traffic congestion. The existing proposed strategy will only continue to be proposed if workable solutions exist. Existing local highway issues identified have been passed on to the Council's Traffic Manager.	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 additional local services.
CSRPO/0048/WARD	Timothy Wheeler	Ward Hadaway	N/A	Comment / Objection	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.	Depends on the outcome of Transport Area Action Plan work being carried out for each of the strategic locations.
<b>CS11 – Meeting Housing Needs</b>							
CSRPO/0014/WB&BP	Ward Bros and Baydale Properties	Ward Bros and Baydale Properties	England & Lyle	Support / Comments	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.	Noted. Specific sites are an issue for the forthcoming site allocations Accommodating Growth DPD to address.	None

CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Query	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 could be provided in the reasoned justification.
CSRPO/0028/ANPC	Norman Welch	Archdeacon Newton Parish Council	N/A	Comment	As there is sufficient unused and underused land available for employment and housing, roads A66 and A1m should be accepted as physical limits to development. The restriction would maintain separation between Darlington (urban areas) and its surrounding towns and villages, and keep town and country distinctive.	Noted. There are no proposals for significant new development to the west of the A1(M) or to the south or east of the A66, except at the Airport.	None
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Comment	How to meet the needs of an ageing population as covered in 6.2.8 gives a broad overview of the issue but does not expand upon how the required additional provision may be delivered. This will be a significant issue in the near future across the borough and we would like to see how DBC, perhaps in partnership with private and third sector providers, intend to address the problem in the long term.	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.	None
CSRPO/0049/RICH	Yvonne Richardson	Resident	N/A	Query	Does 'North Road' refer to the ward or general area? This is different to what it says at paragraph 6.3.9.	Discrepancy noted. The Private Sector Housing Renewal Strategy refers to "North Road" in the context of the whole of the ward as this is based upon the latest private sector stock condition information showing poorest housing conditions in four priority wards which include the wards of North Road, Northgate, Central and Bank Top.	Change CS12 to read North Road/Northgate.
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Support	As previously stated, the Agency has no particular comment, but is generally supportive of providing a range of housing choice, which can help to reduce the need to travel.	Support Noted	None
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Objection	Object: There is inadequate evidence to demonstrate that the aims of the policy can be delivered without fundamentally affecting the viability of new housing development, so delaying new housing development or preventing it coming forward at all. The requirement for 40% affordable housing on sites in areas of acute need (e.g. the west end) appears excessive, especially when other parts of the built up area of the town, adjacent to the West End are identified as areas of only moderate need.	An economic viability of land study is underway and will inform finalizing 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.
CSRPO/0003/Cjo	Charles Johnson	DBC (Councillor)	N/A	Query	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 this policy is paramount	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.
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support	Policy CS11 aims to achieve a balanced housing stock, which meets local need and aspirations, by delivering a mix of dwelling types, sizes and tenures. It is proposed that all developments of 15 dwellings (or 0.5ha) or more within the main urban area, and 5 dwellings (or 0.2ha) outside of it will be required to contribute to this mix, to meet identified shortfalls. This is consistent with RSS policy 30a. Policy CS11 sets targets for the provision of affordable homes, according to the level of need. This is consistent with RSS policy 30b.	Noted	None
CSRPO/0048/WARD	Timothy Wheeler	Ward Hadaway	N/A	Comments / Support	The Council's targets for delivering affordable housing will be difficult to achieve with the emphasis on brownfield sites within the existing urban area, due to the costs of developing such sites and issues of viability that would arise. We welcome the Council's commitment to conduct a study to assess the proposed affordable housing policy against development viability considerations.	Noted. The Council has commissioned Level Ltd to undertake an assessment of the economic viability of housing land.	Work by the consultants will inform the preparation of viable affordable housing targets in the publication version of the Core Strategy.
CSRPO/0035/GONE	Mary Edwards	Government Office for the North East	N/A	Objection	The Secretary of State objects to draft Policy CS11 as it conflicts with PPS3: Housing paragraph 29 which states that "Local Planning Authorities should set an overall (i.e. plan wide) target for the amount of affordable housing to be provided." The draft Policy and supporting text fail to establish an overall affordable housing target, which would help, set the context for the draft policy.	Noted. An overall target will be set once the economic viability of housing land study has been completed, to inform the target	Work by consultants will inform the preparation of viable affordable housing targets in the publication version of the Core Strategy.
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Support	CPRE supports this policy.	Support Noted	None

CSRPO/0033/ONE	Wendy Hetherington	One Northeast	N/A	Support / comment	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 Ltd 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.
CSRPO/0016/DAD	Gordon Pybus	Darlington Association on Disability	N/A	Objection	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.	None
<b>CS12 – Existing Housing</b>							
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	None	No comment.	Noted	None
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Query	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 cost effective 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.	None
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support	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.	Noted	None
CSRPO/0033/ONE	Wendy Hetherington	One Northeast	N/A	Support / Comment	Welcomes intention to regenerate and improve the existing housing stock. A further detail within this policy's intentions would be to ensure that opportunities to dramatically improve insulation and energy efficiency standards are not missed during renovation. It is important that the CO <sup>2</sup> emissions from domestic properties are recognised. The Council should explore opportunities to provide affordable warmth to vulnerable householders and negate the impact of rising energy prices. If not done now, this could delay improvements by 30 years. New products are now becoming available for 'hard to treat' properties and the Council should be aware of new resources of up to £350 million available through the Government's Community Energy Saving Programme.	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.	None
CSRPO/0037/NWL	Mr. Steve Wharton	Northumbrian Water Limited	England and Lyle	Comment	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.	Noted. This is also highlighted in our Design of New Development SPD, adopted in July 2009.	None
CSRPO/0003/Cjo	Charles Johnson	DBC (Councillor)	N/A	Query	Page 81 CS12 Existing Housing: What is the cost of a 3% 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.	None



CSRPO/0049/RICH	Yvonne Richardson	Resident	N/A	Comment / Query	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.	Housing management and occupancy issues are difficult to address through the LDF. The policy as drafted only suggests demolition in exceptional circumstances; after all other options have been considered and dismissed. A Sub-regional Empty Property Strategy is being developed to tackle long-term empties within the Tees Valley. This will encompass a number of different approaches to tackling empty properties with demolition and clearance as a last resort when all other options have been explored. The Authority proactively contact long term empty property owners providing advice, assistance and signposting to financial assistance as appropriate. In the more difficult instances, legal notices are served to ensure emergency repairs are undertaken. The adopted Code for Sustainable Homes has focused on modern construction standards achieving degrees of thermal comfort to meet Decent Homes standards and reduce carbon emissions from domestic properties, which currently contributes between 20-30% of all carbon emissions. Some older properties cannot achieve the enhanced thermal comfort levels due to their construction without significant levels of funding to deliver internal insulation reducing room sizes and causing high levels of disturbance and decoration cost, or, external wall cladding which can sometime detract from the beauty of some of the natural heritage or street scene.	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support / Comment	Welcomes the thrust of this policy, but would suggest that in respect of © repair, adaption and remodelling, be ruled out only if it is economically non-viable or unsustainable.	This suggested change would clarify this section of policy	Change CS12(c) to read 'repair, adaptation and remodeling have been considered and ruled out as economically unviable or unsustainable. This would need to be subject to an independent financial viability assessment.
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support	Welcomes the statement in Para 6.3.2 that existing housing will continue to be the cornerstone of the Borough's housing offer.	Support Noted	None

CSRPO/0049/RICH	Yvonne Richardson	Resident	N/A	Comment / Query	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 inequity 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 inequity 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 short the inequity 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 homes 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.	Agree that not all older houses are substandard or inadequate. However, many of the issues that are raised here are beyond the scope of planning policy. However, by identifying these areas as priorities for regeneration, when funding does become available, the Council will be able to work with partners, including private landlords, to address the issues identified. However, the Council does have far less powers over private landlords than it does over managing its own stock and that of RSLs. The Authority operate a highly successful Private Landlord Accreditation scheme, which boasts 50+ private landlords and includes more than 300 privately, rented homes in Darlington. The aim of the accreditation scheme is to raise housing and management standards within the privately rented sector stock and this has been very successful and regarded as good practice and adopted by other local authorities. The Authority also host bi-annual Private Landlord Forum events inviting keynote speakers to inform private landlords of legislative changes, access to funding, and to signpost to other partner agencies. The Authority have a dedicated Private Sector Housing Team which promotes its services through the website, Private Landlord Newsletters and articles in the Town Crier. The team, offer a range of different services to respond to housing conditions and disrepair in the private sector alongside free information and advice. In the worst instances of disrepair, the Private Sector Housing Team can take enforcement action through serving legal notices to ensure emergency repairs are completed within a set timescale. The Private Sector Housing Team also act as a referring agent to the Home Improvement Agency, Care and Repair who offer a range of financial assistance loans for private landlords and home owners to access funding for improvements to their homes.	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	Figure 6.3 identifies areas of acute, high and moderate need in respect of affordable housing. I interpret the need in the area in the SW corner to be moderate and the other uncolored areas to represent high need, but the figure is not at all clear.	Noted. The shading did not print correctly – this will be rectified in the publication version.	Make Figure 6.3 clearer.
<b>CS13 – Accommodating Travelling Groups</b>							
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Support	The Agency is generally supportive of the policy and in particular the promotion of sites for Gypsies and Travellers and Travelling Show people in locations which are sustainably located and accessible, within existing settlements and where possible re-using brownfield land.	Support Noted	None
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Comment	As mentioned in our previous response, PPS25 identifies travelling sites to be highly vulnerable within flood risk zones. We recommend that the following be added to the policy/text under the 3 points listed: '...and located in areas not at risk of flooding'.	Noted.	CS13 will be amended accordingly
CSRPO/0003/Cjo	Charles Johnson	DBC (Councillor)	N/A	Objection	Page 84 CS13 Travelling Groups: We should limit our provision to the main sites only. We should not exceed our statutory duty. Like many other Boroughs, Darlington should not be easy access to these groups.	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.	None
CSRPO/0028/ANPC	Norman Welch	Archdeacon Newton Parish Council	N/A	Comment	The criteria stated should be strictly adhered to, without exception.	Noted	None

CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support and Comment	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.	Noted	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Criterion (b) should more correctly refer to landscape character. It is not clear what is meant by landscape amenity.	Consideration to be given to rewording this part of policy.	Consideration to be given to rewording this part of policy.
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	English Heritage supports revised draft policy CS13 but would advocate the use of the word 'unacceptable' rather than 'significant' in CS13 ©.	Noted	Consideration to be given to minor wording change to policy
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Query / Objection	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.	None