

Reference	Name	Organisation	Agent organisation	Type of representation	Comments (incl Para numbers)	Officer comments	Proposed changes
<b>CHAPTER SEVEN – A DISTINCTIVE, GREENER, CLEANER ENVIRONMENT</b>							
<b>CS14 – Local Character and Distinctiveness</b>							
CSRPO/0028/ANPC	Norman Welch	Archdeacon Newton Parish Council	N/A	Comment	Landscapes must be safeguarded as the largely unspoilt approach viewpoints from all directions are on the most attractive features of the town.	CS14 states that the distinctive landscape character areas will be protected, as will views of approaches into the town and the town and village skylines.	None
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support	Principles of protecting and enhancing the Borough's distinctive built and natural townscapes and landscapes are consistent with RSS policies 8, 31 and 32.	Comments welcomed and noted	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support / Objection	Broadly support the content of this section but would like some changes to CS14: The distinctive qualities of the Borough's built, historic and natural environmental assets will be protected...Protecting, enhancing and promoting the quality and integrity of Darlington's distinctive designated, or otherwise nationally significant, national built heritage and archaeology...	Comments welcomed and noted	CS14 will be amended accordingly
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	Monitoring indicators should refer to new, and update character appraisals, and Management Plans. Up to date Conservation Area Character Appraisals are important tools for informing decision making, but they must be accompanied by management plans containing specific actions for improvement. A further indicator should be the removal or reduction in level of risk to assets on Heritage Risk Registers.	Comments welcomed and noted	Indicators will be amended accordingly
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Support	Support inclusion of CS14 in the Core Strategy. Implementation framework – should also include Tees Valley BAP.	Comments welcome and noted. Darlington is covered by the Durham BAP and not the Tees Valley BAP.	Add Durham BAP to the implementation framework.
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	Table 2.1 sets out the issues for the CS to address but it is disappointing that CS14 has no cross-cutting contribution e.g. attracting economic investment or promoting and improving the town centre especially when, Table 2.2 recognises that improving livability by improving the environment, cultural assets, and retail offer of the area is a priority for achieving economic competitiveness. It is inconsistent with the SA.	Noted. The Borough's distinctive heritage plays an important role in helping to attract investment and help the Borough meet its economic aspirations.	CS14 will be amended to reflect the cross cutting themes in the Core Strategy.
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Support / Comment	Generally support CS14 but does section (III) protect non listed individual buildings of merit which are outside the conservation areas or other areas mentioned like an old, fine building from demolition where the developer can make more profit from demolish and rebuild than from a refurbishment? A local list is noted and could be a useful way forward, though more detail of how it would operate and timetable for introduction would be helpful. Are settings of buildings in the areas, which are currently, low density, like the west end of Darlington included? Can this policy resist pressure for the building of dwellings in the gardens of large houses and the resulting town cramming? If CS14 iii does not deal with the above concerns where is the provision elsewhere to do so?	CS14 protects nationally protected and designated buildings, features and settings, as well as those in Conservation Areas, that reflect the railway, industrial and Quaker heritage and those on the local list (which is currently being prepared) and those on the local at risk register. Should a building, feature, landmark and/or setting fall into these categories then CS14 would afford it protection and seek to enhance them where appropriate.	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Policy/Para. No.7.1.6 /7.1.7/7.1.8CS14: 7.1.6 The European Landscape Convention (ELC) defines landscape as 'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'. Encourage the ELC objectives to be embedded within strategies and policies at the local level. Based on this definition of landscape, the term 'built and natural townscapes and landscapes' could be replaced simply by 'townscape and landscape'. Landscape character is created by the interaction of geology and soils, biodiversity, land use, historical character, and people's experience of the landscape. 7.1.6/7.1.7 The three landscape character areas referred to are now known as National Character Areas: Tees Lowlands, Durham Magnesian Limestone Plateau, Durham Coalfield Pennine Fringe. 7.1.10 Links should be made to CS17 on green infrastructure.	7.1.6 Whilst recognizing the ELC definition of landscape, it is considered that the term 'built and natural townscapes and landscapes' more appropriately describes landscape in Darlington at a local level.	References to landscape character areas (7.1.6/7.1.7) and links to CS17 (7.1.10) will be amended. No change required to 7.1.6.

CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Comment	Policy/Para. No.7.2.1/7.2.2 /7.2.3/7.2.6: 7.2.1 Footnote (1) SSSIs are also nationally important geological sites. 7.2.2 This should refer to priority habitats and species, and European and nationally protected species, and make clear that the protected species are covered by other relevant legislation which may need to be taken into consideration in any development, even where there are Permitted Development rights. 7.2.3 This paragraph should also recognise the contribution of wildlife networks and all wildlife sites (including SSSI) to the strategic green infrastructure network (and policy CS17). 7.2.6 1st sentence – this will also allow adaptation to climate change. Should read priority and protected species such as Great Crested Newts. 7.2.8 Should read species7.2.9 Restoration, creation and enhancement of priority habitats can also be delivered as part of an integrated approach through use of agric- environment schemes such as Environmental Stewardship.	Noted	Amend footnote accordingly
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	Support	Impressed with CSRPO as it identifies matters of importance like protecting and enhancing built and natural landscapes (CS14) and the Green Infrastructure Network (CS17). The embedding of environmental issues and policies throughout is welcomed.	Comments welcomed and noted	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support / Comment	Welcome the content of this chapter but the long term is not defined and it is to be hoped that a local list for will come sooner rather than later, consistent with Heritage Protection Reform, draft PPS15 and EH 5 year Strategic Plan due to be published in the summer.	The long term covers the plan period to 2026. A local list is currently being prepared.	None
<b>CS15 – Biodiversity and Geodiversity</b>							
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support	Pleased to see that protection and improvement of watercourses and wetlands have been highlighted. River restoration should also be encouraged and green buffer strips created where new development is proposed near watercourses consistent with PPS9. Pleased to see the aim to protect and enhance biodiversity in the CSRPO and that previous comments have been taken into account. Strongly support policies in relation to biodiversity including CS2, CS4, CS15 and the supporting text and CS17 is in line with PPS9.	Comments welcomed and noted	None
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	None	No comment.	Noted	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Some comments made on earlier drafts are repeated and should be re-considered and CS15 amended. What is meant by sufficient level of habitats (is this range, quantity or quality)? What is meant by 'to maintain the sustainability' of the target priority habitats and species? (1) We suggest this should be reworded to conserving, restoring, enhancing and delivering appropriate management to maintain and enhance the integrity of sites identified as having high biodiversity and geodiversity value including...(2) this should be reworded as there are other mechanisms to protect and extend the priority habitats network alongside provision in new development, such as use of agric environment schemes, biodiversity enhancements to the existing green infrastructure network, different environmental management regimes for example roadside verges etc (3) this should be reworded to `ensuring that new development would not result in any net loss of biodiversity value and where appropriate delivers biodiversity enhancement and geological conservation as part of good design.` (4) this should be reworded to `where appropriate restrict or manage access and usage in order to conserve an areas existing biodiversity value whilst enhancing biodiversity along access corridors and linking habitat networks. (5) Hedgerows should be added to the list. Delivery Organisation – Natural England should be added here – through the use of Higher Level and Entry Level Environmental Stewardship.	These points are very detailed and require further consideration before detailed responses can be provided. 1) CS15 will be amended to reflect this comment2) It is acknowledged that there are a range of mechanisms to protect and extend priority habitats, however the Core Strategy can only identify those that the planning system can influence.3) This is covered by 24) and 5) CS15 will be amended to reflect this comment Delivery – Natural England will be added.	Further consideration of comments required.1), 4) 5) and delivery will be amended accordingly to reflect comments made3) No change required
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support	Protecting, enhancing and extending the borough's biodiversity and geology, including designated sites, ancient woodlands, watercourses and wetlands, and seeking to minimize the impact of development is consistent with RSS policies 8, 33 and 36.	Comments welcomed and noted	None
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Support	CPRE supports this policy.	Comments welcomed and noted	None
<b>CS16 – Protecting Environmental Resources, Human Health and Safety</b>							
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support / Comment	Support the first line to locate more vulnerable activities outside of high risk flood zones. Recommend that the second sentence is reworded to clarify that only if the Sequential and Exception Test is passed will it be considered in higher risk areas. It should be stated that the development itself mitigates flood risk and does not cause or exacerbate flood risk elsewhere. Strongly support the aim to encourage SUDs in new development but recommend that it is considered for existing development e.g. retrofitting.	Noted. It is not the purpose of this document to require retrofitting of SuDS.	Appropriate references to the Sequential and Exception Test will be incorporated in the supporting test.

CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Objection	Para. 7.3.1 states that the Borough's natural environment is a valuable, but fragile resource as is the built and historic environment, which should be protected. Heritage assets are a finite resource that once gone, are gone forever. Conservation of the historic environment reduces the waste removed to landfill, reducing the demand for natural resources, reducing the energy required to manufacture and transport new building materials for construction afresh. CS16 does not exclude such considerations, but would urge references to them to be more explicit.	These matters are appropriately identified in CS2, which requires all development proposals to make efficient use of land, existing buildings and resources and incorporate measures to reduce carbon emissions, reduce energy management and adapt to climate change.	None
CSRPO/0037/NWL	Mr. Steve Wharton	Northumbrian Water Limited	England and Lyle	Support	Satisfied that CS16 addresses previous issues and supports the reference to complying "with national planning guidance and statutory environmental quality standards for (b) area at risk from surface water run-off, groundwater, mine water and sewer flooding".	Comments welcomed and noted	None
CSRPO/0037/NWL	Mr. Steve Wharton	Northumbrian Water Limited	England and Lyle	Support	Para 7.3.7 and 7.3.9 NWL's previous representations requested explicit reference to the inclusion of sustainable urban drainage systems (SUDS). Support the reference to SUDS in Para 7.3.7; it is important that this policy context is retained in the submission Core Strategy. Town Centre Fringe is drained by a combined sewerage system and NWL urge that there are benefits from re-directing surface water into the Skerne to reduce the risk of sewage flooding in the town centre, reduce the foul discharges from the sewer overflows helps the environment and reduces the power and treatment costs of dealing with surface water through the sewerage system. These should be explicitly embraced in policies in the Darlington Town Centre Fringe AAP. NWL supports the reference to 'integrated drainage solutions' in Para 7.3.9 and it is important that this policy context is retained in the submission Core Strategy.	Comments welcomed and noted	None
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support / Objection	Aim of reducing the risk of flooding and water pollution is consistent with RSS policies 34 and 35. In order to reinforce this policy, would support the inclusion of a requirement for Sustainable Drainage Systems to be incorporated in planning applications. Reducing air, land, light and noise pollution are consistent with RSS policies 2, 8 and 37.	The use of SuDS is discussed in para 7.3.7 of the supporting text and is also required through the incorporation of sustainable building standards in CS2. Further detailed guidance on incorporating SuDS is set out in the Council's adopted Design SPD.	None
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Support	CPRE supports this policy.	Comments welcomed and noted	None
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	None	No comment.	Noted	None
CSRPO/0003/Cjo	Charles Johnson	DBC (Councillor)	N/A	Objection	The broad statement about developments which have an adverse impact should be avoided. This could result in many industrials looking elsewhere when we need to boost manufacturing.	'Development which have an adverse impact on environmental resources should be avoided' is consistent with national guidance and will remain in CS16. However this should not discourage manufacturing to locate in the Borough; mitigation would be required to ensure that environmental resources were adversely impacted upon, required by CS16.	None
CSRPO/0018/CA	Deb Roberts	The Coal Authority	N/A	Support	Within Darlington, there is a small area of past coal mining legacy in the north of the Borough. Whilst it is unlikely that any development will be proposed in this particular area of Darlington, consider it important that a requirement is included within the CS for developers to consider ground conditions and land stability. Pleased to note that CS16 addresses the requirements of PPG14. Para 7.3.2 sets an appropriate justification for CS16, by acknowledging Darlington's industrial heritage and resulting legacy.	Comments welcomed and noted	None
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Objection	Tees Valley SFRA is a good starting point for allocation of development outside of flood risk areas but strongly recommend that the Darlington SFRA be used at a more site specific level and to inform the Sequential Test. CS16 a) it should be stated that "areas at risk from river flooding from Main Rivers and Ordinary Watercourses" as Cocker Beck is classified as a Main River. CS16 should be supported by the Darlington SFRA and its recommendations.	Noted. The Darlington SFRA is an important part of the LDF evidence base and has helped inform the Core Strategy. It will also be used to help inform the Core Strategy Sequential Test paper that will be produced to accompany the submission Core Strategy.	CS16 will be amended accordingly.

CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Objection	A main area of concern is flooding, not only in regards to Croft House but also Cree Beck. Regardless of the development of Croft House, the flood risk, when the Tees flows at more than 700cu m/sec, when flooding occurs, nothing in the new development or existing area will stop it. Want CS16 to state and reassure residents how DBC and the EA intend dealing and preventing flooding. Identify not giving planning permission to future development, but how will communities already there and suffering be assisted. Will the Croft House development be refused as it falls within these proposals? In Appendix 6 section 11 states 'Flood Risk, none identified'. This requires amendment. Several parts of Hurworth are prone to flood risk and recently a Flood Warden Scheme has been established, along with major areas of Neasham. Plans have been put forward (and apparently approved) to allow the construction of houses at Croft House in Hurworth Place. Also have recently had major issues of flooding in Cree Beck. This is likely to further inflate the flood risk and could cause serious damage and grief to adjacent residents. Strongly urge you to revisit Appendix 6 and CS16 and correct the information contained therein.	CS16 sets out how new development will, once the Core Strategy is adopted ensure there is no detrimental impact on the environment, amenity and health and safety of the community from a range of issues including flood risk. The Croft House application is being considered under the adopted Local Plan and concerns should be raised through the planning application consultation process. The Environment Agency should also be contacted to discuss the issue of flood risk to existing properties. Appendix 6 refers to a specific site within Hurworth (SHLAA 17) where the Council's Strategic Flood Risk Assessment considers it is possible to develop the site leaving a small part of the north eastern corner as open space to allow water to be stored and drained in times of flood risk. This does not apply to the whole village.	None
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Comment	Support the policies relating to contaminated land, which are in line with PPS23. Para 7.1.11 (b) prioritises contaminated sites for use, which is fully supported. Redevelopment of contaminated land should be undertaken following PPS23 & Contaminated land report 11 - Model procedures for the management of land contamination (CLR11). Para 7.3.11 goes on to describe how the risk-contaminated land poses will be mitigated which is strongly supported. Fully support CS16 but some land uses, like landfill may not be appropriate in Groundwater Source Protection Zones.	Noted. CS16 requires all development within the identified areas including Groundwater Source Protection Zones to comply with national planning guidance and statutory environmental quality standards, which would ensure that only appropriate development is located in these areas, with mitigation, where appropriate.	None