

Reference	Name	Organisation	Agent organisation	Type of representation	Comments (incl Para numbers)	Officer comments	Proposed changes
GENERAL, LIP AND SA COMMENTS							
CSRPO/0008/ANEC	C. Megginson	North East Planning Body	N/A	Support	CS in general conformity with RSS and will assist with implementation of regional policies	Noted	None
CSRPO/0013/JS	Joanne Scott	Resident	N/A	Comment	Make improvements to Borough Road Area to tidy up the area, make room for more entertainment facilities for young people. More family friendly places to eat. Make nicer buildings on Borough Road drawing upon heritage - the old school, nursery and fire station for example.	These matters are too detailed for the Core Strategy. These detailed issues will be considered in the preparation of the Town Centre Fringe Area Action Plan, work on which is underway, with consultation on Issues and Options timetabled for this autumn.	None
CSRPO/0007/PAL	Stephen Gaines	Peel Airports Limited	N/A	Support / Comment	Support references to DTVA throughout document in particular CS1, 5,6 and 19. Welcome reference to safeguarding land in respect of renewables but may also need to address this issue further in terms of other land uses in other DPDs and plans.	Noted	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Para. No 2.3.16: This section should also explain the purpose of the Habitats Regulations Assessment, and how its findings have been considered in shaping the options in the document.	Agree	Add sentence to indicate that screening to establish the need for a HRA has been carried out and to state key conclusion.
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Support	Support for the overall thrust of the proposed spatial vision for Darlington and that will hopefully see Darlington continue to develop and the physical and economic gateway to the Tees Valley City Region and North East England as a whole. The town is uniquely placed in this respect and it is vitally important if this vision is to be achieved, for the Borough Council to ensure that it makes available for residential development, sufficient land in the right place, at the right time, in and around the town, to secure this objective. It is accepted that re-use of previously developed land and buildings within the urban area will play a significant role in this vision, but of equal importance will be the need to identify and allocate other land around the periphery of the urban area to help meet specific needs and deliver a robust and balanced portfolio of deliverable sites particularly in relation to housing. The need to make provision for one or more sustainable extensions to the urban area of Darlington within the CS, to meet housing needs and deliver the wider spatial vision for the town over the plan period to 2026, and potentially beyond, is therefore fully supported.	Noted	None
CSRPO/0001/CAA	K Rienzeema	Civil Aviation Authority	N/A	Comments	General comments are provided, mainly regarding notification of planning applications for developments, which may have an impact on an aerodrome's activities.	Comments noted	None
CSRPO/0003/Cjo	Charles Johnson	DBC (Councillor)	N/A	Objection	The two drivers for this plan are the RSS and SCS and are not in the right priority. Reason: I do not accept the regional spatial strategy offers the best solutions for Darlington. By its very nature there must be compromises, which as a representative of the Darlington electorate I would not be prepared to accept. The Sustainable Community Strategy written in times of virtual buoyant economies has to be the primary driver however its aspirations and action plans need a complete review to validate with the more difficult times ahead.	To be sound, the LDF must be in general conformity with the RSS and be clearly linked to the SCS, as the spatial expression of it. Whilst there are some plans to review parts of the SCS, these cannot be taken into account in the LDF until they have been finalized and agreed.	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Para. No.2.3/ 2.3.1: 2.3 There is little consideration in this section of any other key issues impacting upon the natural environment apart from climate change, or even a description of the 'intrinsic natural qualities' (page18) found in the Borough. A summary of these should be derived from the SEA and included in this section.2.3.1 In order to deliver sustainable development; there is also a need to ensure consideration of sustainable communities. A summary of these should be derived from the SEA and included in this section, in order to provide the context for the key spatial challenges.2.3.1 Text needs amending to reflect the challenge of delivering sustainable development, an integrated approach to tackling economic, social and environmental challenges.	A meeting will be arranged with Natural England to discuss these comments, as there may be difficulties in accommodating the changes suggested whilst also streamlining the document for publication.	Depends on the outcome of further discussions.
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Table 2.1/Table 2.2.: Table 2.1 Emphasizing the Boroughs positive qualities - this should also include policies CS17 on Green Infrastructure and CS15 on Biodiversity and Geodiversity. Table 2.2 Improving liveability -this should include CS15. Biodiversity and geodiversity should be seen as an asset, of intrinsic value to the area. Should add to list of policies.	Agree	Make changes suggested
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Comment	Sustainability: We believe that this heading covers two aspects: 1: Local resources, of which Darlington is well provided; 2) Sustainability as an independent 'business unit' where the generation of external revenue is a vital factor. It appears that Darlington may not be sustainable in its current structure.	Noted, but not clear what change could be made to accommodate this.	None

CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support	I welcome the message that best use should be made of existing land and buildings, and that design of new development should be of a high quality. Themes relating to the better use of existing housing, the enhancement of the town centre and strengthening distinctiveness and character through heritage are welcome too.	Support Noted	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Comment	Theme 6 requires restructuring. I would contend that the 'natural' and historic (built) environment of the Borough is to be found area-wide and forms the backdrop to everything that occurs within it. It is therefore this on which primacy should rest. It is unfortunate that the chapters of the document that follow do not relate well to the way in which these objectives are set out. RECOMMENDED CHANGES: Reword: Contribute to the happiness, fulfillment, health and well being of people who (...) by safeguarding and enhancing the natural and historic environment, and by the provision and upgrading of a wide range of (...) facilities within it.	Noted. This is a well-made argument. Suggested change will be given some consideration.	Possible change to wording of strategic objective 6.
CSRPO/0027/SE	Dave McGuire	Sport England	N/A	Comment	Table 2.1 - Sport England supports the recognition of the role that accessible sport and recreation facilities can have in tackling gaps in health and well being in the borough and reducing obesity.	Noted	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Policy/Para. No. Proposed Vision: 2nd paragraph – suggest add to last sentence ` and provided opportunities for the natural environment to adapt to the consequences of climate change'. 5th paragraph - suggest amend the last 2 sentences to 'Small-scale developments will have helped to sustain the vibrancy and individual character and appearance of the Boroughs villages and hamlets. The Boroughs biodiversity and geodiversity resources will contribute to a multi functional green infrastructure network, which will have an ongoing regime of protection, management and enhancement.	Agree to suggested changes	Make suggested changes
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Comments	The reduction in the number of policies compared to the local plan has its advantages but does mean the subsidiary and supplementary document are / will also be crucial. A general policy in the CS may be quite acceptable, but if a subsidiary document does not follow through on the CS, unsuitable development could result. Much will depend on interpretation and implementation and ensuring the spirit of the policies is maintained.	Noted and agree	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support	Section 2.3 outlining the key challenges for Darlington and its LDF confirms the importance of conserving the historic environment and other qualities that help provide that unique sense of place. We welcome too, the focus on the pre-eminence of the town centre as a driver for growth and regeneration.	Support Noted	None
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Comment / Support	The Agency is generally supportive of the Vision and welcomes that consideration has been given to Agency's previous comments and the amendments, which have been made so that the Vision now includes reference to 'sustainable travel'.	Noted	None
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Comment / Support	Generally support the Objectives and welcomes the amendments, which have been made. In particular the Agency is supportive of Objective 1 and the reference to more sustainable patterns of development and means of movement, and Objective 3 with regards to delivering sustainable economic growth through the provision of employment opportunities in sustainable locations. Particular support can also be given to Objective 8 regarding maintaining and enhancing the provision of sustainable transport whilst making the most of existing infrastructure, tackling congestion and improving links to the rest of the Tees Valley area.	Noted	None
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Objection	The SA is inadequate in respect of its comparative assessment of strategic options C, D, E and F. Option F is a more sustainable location than the alternatives - see comments in Appendix 6 of the CS.	See response to other comments.	None
CSRPO/0032/man	Manners Family Trust and Manners Farms Ltd	Manners Family Trust and Manners Farms Ltd	England and Lyle	Support / Comment	Support the overall thrust of the proposed Spatial Vision for Darlington. If this Vision is to be achieved, the Council must ensure that it makes available for residential development sufficient land in the right place at the right time, in and around the town, to secure this objective. It is accepted that the re-use of previously developed land and buildings within the urban area will play a significant role in this vision but of equal importance will be the need to identify and allocate other land around the periphery of the urban area to help meet specific needs and deliver a robust & balanced portfolio of deliverable sites particularly in relation to new housing. The need to make provision for one or more sustainable urban extensions to the urban area of Darlington, within the Core Strategy, to meet housing needs and deliver the wider spatial vision for the town over the plan period to 2026, and potentially beyond, is therefore fully supported.	Noted. The allocation of housing sites will take place in the forthcoming Accommodating Growth DPD.	None
CSRPO/0018/CA	Deb Roberts	The Coal Authority	N/A	Comment	Figure 1.1 is useful. Paragraph 1.2.2 should include additional text to clearly illustrate to the reader the relationship between the emerging Tees Valley Minerals and Waste Core Strategy and the rest of the Darlington LDF. This is of particular importance in relation to Mineral Safeguarding Areas, which will be defined through the Tees Valley Minerals and Waste Core Strategy, and will need to be transposed onto the LDF Proposals Map. The Coal Authority therefore considers that the following wording should be added to paragraph 1.2.2: "...and is due to be submitted to the Government for Independent Examination shortly. The Tees Valley Minerals and Waste Core Strategy will identify issues such as Minerals Safeguarding Areas and waste proposals that will be illustrated on the Darlington LDF Proposals Map." Reason – To clarify the relationship between the Core Strategy and the Tees Valley Minerals and Waste Core Strategy, and ensure that surface coal resources	The reference in Para 1.2.2 is perfectly adequate for the purpose of the Core Strategy.	None

CSRPO/0015/HILTON	Mr. Paul Hilton	Resident	N/A	Comment	Considering the planned housing expansion beyond West Park and High Grange and the potential distance from community facilities, I think it would improve community involvement to plan for a dual use church/community centre for a range of leisure, fitness and social activities.	Suggestion noted. This will be considered in drawing up the local infrastructure plan and in the future consideration will be given as to whether land could be allocated with the North West Urban Fringe area for such a facility, and whether there is sufficient funding and other support from a range of organizations/agencies.	Not in the Core Strategy but will be considered in other associated more detailed planning documents.	
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support	EH welcomes the intention to sustain the rural settlements of the Borough by (only?) allowing small-scale (appropriately?) scaled developments if they respect their character and appearance.	Support Noted	None	
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Support	My Council fully supports and concurs with the need to maintain the 2 communities of Hurworth and Hurworth Place. Both communities have their own identity and self worth (page 9 2.1.5). It is vital that the need to focus on the provision of services and facilities to sustain the rural communities must be high on the agenda (p24 3.1.13).	Noted. However, this document does not indicate any need or otherwise to maintain Hurworth and Hurworth Place as separate communities. A review of limits to development, that will take place as part of preparing a forthcoming Making Places DPD will be where this matter could be addressed.	None	
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Support	CPRE has been impressed with this document as many of the policies promote matters of importance to us, such as protecting and enhancing built and natural landscapes (CS14) and the Green Infrastructure Network (CS17). The embedding of environmental issues and policies throughout the document is also welcomed.	Noted and welcomed.	None	
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Support	Ref Para 2.2.3 'Manufacturing and primary industries now account for only about 10% of all jobs'. Throughout the report the objectives are well set out, and the transport, housing and logistics strengthen the theme of One Darlington Perfectly Placed.	Support Noted	None	
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Objection	Darlington has traditionally been a market town, but in recent years the marketing centre concept might appear to have declined. The LDF does not address the importance of farming and agriculture as an essential segment of the community and the sustainability of the borough. We see French markets selling in the town and we see many advertisements for Xmas markets in European towns of similar size to Darlington, and we see other market towns such as Lincoln, actively promoting their markets. It may be beneficial for DBC to reevaluate this source of revenue and build provisions into the new framework. We would ask however, that consideration be made to preserve and support the businesses in the rural areas such as ours for DBC to give its support and perhaps work to the local economy of the rural areas. We also need to ensure shops and businesses in the rural villages, post offices are not lost in an attempt to preserve Darlington town center. These businesses along with public houses are the bedrock of communities and the lifesaver of elderly and disabled without cars or a decent bus service.	The appearance and environmental value of Grade 1, 2 and 3 agricultural land will be protected and where appropriate enhanced by CS14. The contribution of agriculture to the local economy is noted at para 4.1.6. The detailed management of markets and Darlington town centre is not a matter for the CS, however farmers' and general markets - open to local producers - do take place in the town far more often than continental markets. The policies of the CS (in particular CS9) are in no way intended to undermine village shops and services; quite the reverse. VA to provide further comments.	None	
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Comment	Yarm Road and North Road both need a face-lift and we believe that this should be built into the framework.	Noted. However these issues are too detailed for this document. Improvements to specific areas of the Borough can be identified through future LDF documents and other Council plans and strategies as well as through planning applications, in particular the design of new development as set out in the Council's adopted Design SPD.	None	
CSRPO/0053/HPC	John Robinson (Parish Clerk)	Hurworth Parish Council	N/A	Comment	There is a need for greater police presence.	Outside the scope of the Core Strategy.	None	
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support	Welcome the pre-eminence of the town centre as a driver for growth.	Noted	None	
CSRPO/0039/dsg	N/A	DSG International	Indigo Limited	Planning	Comment	Para 5.1.9 Refers to a loss of market share from the town centre to destinations within and outside the Borough, including the Metro Centre and Teesside Park drawing trade away having been occupied by 'high street' names. The objective of clawing back expenditure on these non bulky goods, which traditionally underpin the town centre retail function, is clearly beneficial for the town centre though the units with large floor plates within the Borough (required to accommodate a significant amount of space for display, circulation and access are not characteristics attributable to town centres) do more to beneficially retain expenditure on bulky goods within the Borough than to draw trade from the town centre.	Agree that retail warehouses help retain expenditure on bulkier comparison goods within the Borough. But the Para. Is factually correct in saying that some of these stores now supplement such sales with the sale of smaller items, albeit not in contravention of the relevant planning permissions.	None

CSRPO/0039/dsg	N/A	DSG International	Indigo Limited	Planning	Objection	Whilst the economic value of retailing is acknowledged with regard to the town centre economy the document does not acknowledge the wider economic role of retailing elsewhere in the Borough. The retail sector is comprised within the classification of economic development in PPS4 and is now widely recognised as having an important employment role, which can meet the needs of the local population. In particular for providing employment for excluded groups, those in need of flexible working hours or those previously employed in diminishing sectors. Training employees in the retail sector can provide entry-level access to employment as well as skills applicable for advancement across other areas of the service sector. The economic value of retail within Darlington is therefore more far reaching than its important role within the town centre. For example Darlington Retail Park, including the existing Curry's unit, is a major employer in the town.	Retail matters are covered separately from other economic issues in Chapter 5.	None
CSRPO/0039/dsg	N/A	DSG International	Indigo Limited	Planning	Objection	Para 5.1.6 Does not recognise the value of [major out of centre] retail facilities, such as Darlington Retail Park, which provides a complementary function to the town centre, ensuring bulky goods expenditure is retained within the Borough rather than leaking to other similar facilities outside the Borough which would result in longer car borne journeys.	Disagree: the part that such facilities play in the Borough's retail provision is considered to be adequately acknowledged in the text of Chapter 5.	None
CSRPO/0017/NYCC	Carl Bunnage	North Yorkshire County Council	N/A		Support	Generally does not pose policy-planning issues of significant strategic concern for North Yorkshire. Welcome the emphasis placed upon sustainable development throughout the document.	Noted	None
CSRPO/0055/WEBB	John Webb	Resident	N/A		Query	[Can you] enlighten me regarding the missing section of our Inner Ring Road. This significant feature of previous plans does not figure at all in any current or future planning. In my belief this is a glaring omission and an obvious gap in the 'town centre' plan. What, if any, plans are there to eventually complete the project?	The proposal to construct the final stage (stage V) of the Inner Ring Road, around the western edge of the town centre, was abandoned by the highway authority in the early 1990s following a public inquiry and subsequent refusal of the necessary permissions by the Secretary of State.	None
CSRPO/0057/SPC	Alastair Mackenzie	Sadberge Parish Council	N/A		Support	The majority of the Core Strategy: Revised Preferred Options document is very good. In most cases, there is a thorough analysis of the issues and the preferred options are well thought out and clearly explained. This is particularly true of the sections on "A Vibrant Town Centre and Accessible Local Shops and Services" and "Quality Housing for All".	Noted and Welcomed	None
CSRPO/0057/SPC	Alastair Mackenzie	Sadberge Parish Council	N/A		Support	Sadberge Parish Council agrees that there should be an objective to preserve the scale of – and strengthen the unique character, function and sense of place of – Darlington's villages (objective 7), and that support should be provided to maintain, expand and enhance facilities and networks for public transport, walking and cycling (objective 8).	Noted	None

CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Objection	Proposed changes: Add after first sentence: This section sets out how healthcare, sport and active recreation will change over the LDF period. The task of the LDF is to set a spatial planning framework which will facilitate positive improvements to the Borough's health, safety and well-being and support the vision set out in One Darlington: Perfectly Placed. Inserted prior to Green Infrastructure Para 8.1: Context: Health, well-being and safety are major issues on the national agenda and are closely interrelated. Health is about more than access to medical treatment and services as it can be improved through delivering quality, new and sustainable buildings and supporting residents to gain employment. It is also about encouraging lifestyle changes by providing safe, attractive, pedestrian and cycle routes and safeguarding open spaces and community facilities as well as living in a safe environment whilst promoting socially cohesive and inclusive sustainable communities. Hospital site and health centre form part of the elements that contribute to delivering sustainable communities and consequently, the LDF will contribute to protect existing health facility sites, including the Darlington Memorial Hospital, to ensure that access to health is maximised. The potential requirement for new hospital development and health centres for example through reorganisation / redevelopment will be considered in the DPDs. Testament to this change was the relocation by the Tees Esk and Wear Valleys NHS Foundation Trust Adult Mental Health services from the Darlington Memorial Hospital to the West Park Hospital. Darlington Memorial Hospital is a key provider of healthcare facilities within the administrative governance of the Council. A fundamental requirement of the LDF is that it need to be flexible and that during the plan period to 2023, there is the possibility with changing health policy that there may be further expansion required at Darlington Memorial Hospital. Part of the changing delivery of healthcare services includes the provision of more health services away from a centralised point of delivery to services focused upon local communities. Policy CS17A: Healthcare provision: To improve the health of the Borough proposals for the intensification of healthcare uses on existing sites in accessible locations will be supported subject to addressing other LDF policies. New and relocated healthcare facilities will be permitted only where adequate alternative provision is made to meet the needs of the community served by the facility. The principal health facilities in Darlington, including the Darlington Memorial Hospital, are safeguarded for health provision with a general presumption of continued expansion within their site, accompanied by suitable travel plans to reduce dependency on the private motor car. Within the safeguarded areas, proposals for non-healthcare uses must demonstrate that the land is no longer required for healthcare. In Hospital Areas, shown on the Key Diagram and within the DPD's the following uses will be preferred: Hospital and other residential institutions - research and development. Whereas acceptable uses include small-scale office developments, housing, community facilities and institutions. Unacceptable uses are general industrial and warehouse and open storage. Development proposals for uses not listed would be decided on their own merits and in accordance with the other policies in the CS. Explanatory text: Darlington accommodates a concentration of healthcare services (e.g. hospital/acute services and mental health facilities) of local and regional significance. Hospital sites, particularly the Darlington Memorial Hospital, will continue to see modernisation, consolidation and perhaps the redevelopment of existing buildings and services. But there will be greater emphasis in future to provide more health services in the community, together with the opportunity to create new facilities. This policy aims to establish an environment that enables residents of Darlington to improve their quality of life through the provision of accessible and high quality health facilities. All major development proposals should be subject to a Health Impact Assessment in order to identify and address the potential impacts of the proposal, which will also address contributions to healthcare facilities in policy CS3. The policy also aims to ensure that new facilities are provided in response to the growth of the Borough, changing demographic and gender profiles, and a changing clinical model during the plan period. Implementation - Working with the Trust on the implementation of a programme of high quality healthcare facilities at the Darlington Memorial Hospital and other locations within the Borough as the need arises; - Through the consideration of planning applications;	There is a balance to be achieved between having flexibility in the plan and having sufficient certainty to enable infrastructure and service providers to plan ahead. Further consideration will have to be given as to whether this objection can be addressed without undermining the overall purpose of the Core Strategy.	Further consideration of comments required.
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Should also make reference to reducing the need to travel, and encouraging modal shift to environmentally sustainable forms of transport.	This will be considered in producing the streamlined contextual text, but appears to be a valid comment.	As left
CSRPO/0039/dsg	N/A	DSG International	Indigo Limited	Planning Objection	The Core Strategy should recognise the economic benefit of all retail and enable existing facilities such as Darlington Retail Park to continue to enhance the existing offer in order to maintain competitive with similar types of retail offer outside the Borough.	It is considered that Chapter 5 adequately reflects current retail provision in the Borough, including Darlington Retail Park. Any future proposals to enhance its offer will be considered in the light of local and national policies. No specific provision for growth at the site is considered to be justified in the Core Strategy.	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Para. No.2.1.11: Opportunities for co-ordination and enhancement of the strategic green infrastructure network should also be considered in relation to cross boundary local authority areas, particularly given the growth point status requirements to produce and implement a green infrastructure strategy in the Tees Valley and County Durham. The issue should be added as a bullet point.	Noted and agree. Significant work has taken place regarding cross boundary green infrastructure with the other Tees Valley Local authorities.	Make change suggested

CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support	Pleased to see the aim to protect and enhance biodiversity through the CSRPO and that previous comments have been taken into account. Strongly support policies in relation to biodiversity including CS2 (b) and (g), CS4 points 3 and 5, CS15 and the supporting text and CS17 consistent with PPS9.	Comments welcomed and noted	None
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support / Comment	Support aim to ensure that new development is not located in areas at risk from flooding. This should be demonstrated by applying the Sequential Test, guiding development away from flood risk areas.	Noted	The Core Strategy Sequential Test assessment will be produced to accompany the submission Core Strategy.
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Objection	There is no evidence provided that the Sequential Test has been undertaken for new development identified within the Core Strategy (previously raised in December 2008). PPS25 requires that the Sequential Test be applied at all stages of planning to steer new development to areas at the lowest probability of flooding (i.e. Zone 1). Where there are no reasonably available sites in FZ1 broad locations should be identified for development, infrastructure and allocating land in spatial plans should take into account the flood risk vulnerability of land uses and consider reasonably available sites in lower flood risk zones. PPS25 Practice Guide provides further guidance on the Sequential Test and the need for LPAs to show that the Sequential Test, and where necessary the Exception Test is applied and evidence provided through the Sustainability Appraisal process. The SFRA will provide the basis for applying the Sequential Test, and where the Exception Test is required, a more detailed assessment will need to be undertaken (Level 2 SFRA). We understand that currently there are alterations being carried out to the Darlington SFRA flood zone maps for the Town Centre (along the River Skerne). These flood maps need to be finalised and used to inform the locational strategy of the Core Strategy. Stress that the Sequential Test needs to be undertaken at this stage as we would find the document UNSOUND where the Sequential Test has not been carried out for new development identified within Flood Zone 2 and 3. Page 68 states that flood risk has been considered in regards to the location and deliverability of the locations. However Appendix 6 does not appear to contain a comprehensive assessment on flood risk. This may need to be further clarified.	Noted. A Core Strategy Sequential Test paper is being prepared, to underpin the submission Core Strategy. The Environment Agency will be consulted on this report to ensure that it fully complies with national planning guidance prior to submission.	A Core Strategy Sequential Test Paper will be produced to accompany the Core Strategy.
CSRPO/0019/CPRE	Gillan Gibson	CPRE Darlington District Committee	N/A	Comments	Whilst the first use of an acronym sees what it stands for written out in full, latter uses do not. Someone may only read one particular section in which an acronym is not spelt out. A separate list of acronyms, perhaps as an appendix, would be helpful.	This may be difficult to accommodate as we are encouraged to prepare a more streamlined document for publication. To consider.	Depends on further consideration and ability to accommodate in a streamlined document.
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Support	9.1.26-30 Support this approach. Also links to the green infrastructure policy CS17.	Support Noted	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Comment	Vision: the special character of the town will remain evident 'through its abundant open spaces and environmental resources'. Suggest making it clear that its special character will also be evident in the extent to which the cultural and historic assets of the Borough are cherished and celebrated.	Agree	Make change to 2nd paragraph of spatial vision
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Comment	Para 9.1.21 There should also be a section added here on strategic walking routes /public rights of way network, linked to the identification of any key improvement areas required that are included for example within the Rights of Way Improvement Plan, and/or the Green Infrastructure Strategy – this would provide the link to CS19 (k).	Agree that there is a need for similar wording somewhere in the introductory section, although not in this para which is concerned with transport connections between the Borough and elsewhere.	Incorporate appropriate introductory text to link to Policy CS19(k).
CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Objection	the RPO does not deliver a sound, robust and effective CS. In brief, the Trust requires the CS to incorporate maximum flexibility in its strategy, spatial vision, policies and proposals to ensure future healthcare related development and redevelopment policies and proposals are not prejudiced. Such an approach provides the flexibility that will allow the trust to respond to a changing clinical model in terms of delivering healthcare services and the increasing role of patient choice in terms of source of medical treatment. Such an approach will thereby allow the trust to provide high quality healthcare services to the Borough of Darlington to meet its strategic targets.	There is a balance to be achieved between having flexibility in the plan and having sufficient certainty to enable infrastructure and service providers to plan ahead. Further consideration will have to be given as to whether this objection can be addressed without undermining the overall purpose of the Core Strategy.	Further consideration of comments required.
CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Objection	Vision: focuses upon the aspect of opportunities for work and ignores the fact that the area of healthcare provision is identified as one of the key delivery themes within One Darlington: Perfectly Placed. The Council acknowledges that healthcare is encompassed within quality of life. However, the RPO document does not reference either within the body of the text or a side bar note that quality of life includes healthcare provision. Healthcare service provision is an underlying benchmark for improving the quality of life aside from providing employment and should be given the same status in the document. RECOMMENDED CHANGE: A Vision for Darlington Section should make a separate reference to healthcare provision. 'By 2026 Darlington will be a more sustainable community, where a real step change has been achieved in enhancing the quality of life and local environment, and expanding local opportunities for work and the provision of healthcare services'.	Identifying healthcare provision in the vision would provide too much detail, as it is important that the vision achieves a balance between the provision of healthcare facilities and other elements of social infrastructure that are equally as important to the community. However references to the growing health care sector and the importance of easy access to good quality health care facilities are identified as key elements of the spatial vision.	Minor rewording would be appropriate to ensure that a balance is achieved between economic, environmental and social needs and aspirations in the spatial vision.

CSRPO/0037/NWL	Mr. Steve Wharton	Northumbrian Water Limited	England and Lyle	Comment	Future growth in the Borough would need to be assessed carefully in relation to the capacity of the Company's Sewage Treatment Plan (STP) at Stressholme. Without considering the detailed development scenarios, it is NWL's view that demand for increased capacity from identified growth will be able to be catered for in NWL's identified investment period between 2010 and 2015 (AMP5) but that capacity studies will be needed for growth beyond this period. It should be emphasised that close liaison with NWL at the earliest possible stage is essential to assessing the impact of proposed future development locations and site specific proposals on NWL infrastructure in order to ensure the soundness of all Local Development Plan Documents.	Noted. Discussions are ongoing with NWL to ensure that the water and sewerage demand of the new development proposed in the Core Strategy can be provided for at the times required.	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Para. No.3.0.1: A sustainable Darlington will also ensure that the natural environment is protected, managed and enhanced. (for its own intrinsic value as well as for people).	Point noted	Change introductory text, within the confines of producing streamlined text for publication version.
CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Objection	Strategy Objectives: this addresses each of the subject headings of the CS save for the provision of healthcare despite being referenced within the heading of section 8 - A healthy and Safe Darlington. This is a clear omission allowing for the specific advice within PPS12 section 4 that a CS should provide an overall vision and that the provision and improvement of a healthcare service is a key strategic driver to secure an inclusive, sustainable, durable and socially cohesive Darlington and its communities. Recommends a new theme specific objective to enhance the flexibility of the CS and enable it to deal with the changing nature and needs of healthcare provision across a broad bandwidth of health delivery options. RECOMMENDED CHANGE: A new healthcare theme should read 'Establish an environment that enables residents of Darlington and the surrounding communities to improve their quality of life through the provision of accessible and high quality health facilities either through new healthcare developments or redevelopment of existing sites incorporating healthcare facilities'.	Noted. Whilst the protection and provision of social infrastructure is an important element of the Core Strategy it is important that there is a balance achieved between the provision of healthcare and other types of social infrastructure. Objective 6 sets out the aims for social infrastructure in the Borough for the plan period, including health facilities, which contribute to the health and well being of the people who live and work in Darlington. This approach is considered sufficient to meet to address the aims of the healthcare providers; further detail may be more appropriately addressed in future LDF documents.	None
CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Objection	Para 3.0.1: The paragraph should make reference to the provision of healthcare and community facilities in addition to those identified elements in helping to achieve a more sustainable community. The current construction of the paragraph does not provide the flexibility required of LDF's under the soundness test within PPS12 and is not consistent with National policy advice within PPS1, and its attendant documents. Support is given to this proposition, aside from the advice direct from Government that healthcare provision constitutes an element in forming sustainable communities by the inclusion of such references within a number of CS documents - for example, Leeds City Council PO and North East Lincolnshire PO documents. RECOMMENDED CHANGES: Para 3.0.1 should be reconfigured to include the following wording; ' A sustainable Darlington will incorporate a range of healthcare and community facilities and services in accessible locations that will make public improvements to the Borough's health, safety and well-being'.	Noted. Social infrastructure including healthcare is an essential part of the Borough's infrastructure network. To ensure a balance is achieved between economic, environmental as well as social needs and aspirations the Core Strategy will ensure that reference is made to the importance of social infrastructure.	Appropriate references will be made to the continued and where appropriate, improved provision of social infrastructure in the Borough.
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Comments / Support	Para 2.3.15. I (f) should go further - the energy efficiency of the existing building stock, as a whole must be improved. Also suggests recognising here the need to make prudent use of existing built fabric as well as prudent use of natural resources (RSS Policy 2 (I) (e) refers).	Agree this text should cover all building stock, and prudent use of existing built fabric.	Make changes suggested, where it can be accommodated in revised streamlined text for publication document.
CSRPO/0045/TVLAF	Beryl Bird	Tees Valley Local Access Forum	N/A	Comment	The Tees Valley Local Access Forum has studied the CSRPO and has no comment to make.	Noted	None
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Policy/Para. No. Strategic Objective 7: It is still not clear how the sentence 'preserve the scale of' relates to green infrastructure, landscapes and habitats etc. Suggest replace the first part of sentence with ' Protect, maintain and enhance the unique character, functions.....'	Preserving implies protecting and maintaining, whilst unique character and function would incorporate the particular qualities of green infrastructure, landscape and habitats, as they present themselves.	None
CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Objection	The CS requires a glossary. It is considered that the glossary should define what constitutes social, community and cultural facilities. RECOMMENDED CHANGES: Addition to recommended glossary: Social, Community and Cultural Facilities: Medical and health services, hospitals, day centres, crèches and nurseries, non-residential schools and colleges, training centres and higher education establishments are a few of the community that provide support and training. Community and cultural facilities include buildings and venues for social, cultural and recreational activities such as museums and art galleries, religious meeting places, youth clubs, drop-in centre, and community centre and meeting places (sports halls, swimming pools and outdoor play areas). Libraries provide cultural as well as information services. Pubs and shops can also provide community focus, where there are few other opportunities for community cohesion.	This may be difficult to accommodate as we are encouraged to prepare a more streamlined document for publication. To consider.	Depends on further consideration and ability to accommodate in a streamlined document.
CSRPO/0049/RICH	Yvonne Richardson	Resident	N/A	Support	I wish more people could read these documents. This is readable and logical and so full of information, fascinating to anyone interested in their community. I wish I had more time.	Noted and Welcomed	None

CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Objection	Policy/Para. No. Strategic Objective 1: This objective still does not reflect the need to incorporate adaptation measures for the natural environment in relation to climate change. There is a need to ensure the integrity of habitat networks linking areas throughout and outside the plan area to allow species and habitats movement to adapt to changing conditions. (links to PPS9 paragraph 12). Add 'and to ensure the integrity of habitat networks in order to allow the natural environment to adapt to climate change'.	Noted	Make appropriate change
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Support	EH welcomes the recognition of Darlington as a market town of significant cultural value, providing an integral component of the quality of life and local distinctiveness to be found therein.	Support Noted	None
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Comment / Objection	Table 2.1 sets out the issues for the CS to address. Whilst not taking issue with the matters identified it is disappointing to observe that revised draft policy CS14 Local Character and Distinctiveness it is reported here as having no cross-cutting contribution to make to, for example, attracting economic investment or promoting and improving the town centre. This is especially surprising, when, in Table 2.2 it is recognised that improving livability by improving the environment, cultural assets, and retail offer of the area is a priority for achieving economic competitiveness. It is also somewhat at odds with the findings of the SA.	Agree. A change needs to be made for consistency throughout the document.	Include references to CS14 in a revised Table 2.1 or similar.
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Comment / Support	Para 2.3.17 sets out the key spatial challenges for the Borough. EH welcomes reference to making better use of existing housing, and ensuring that distinctiveness of place is maintained and enhanced, the latter, however, through the Borough's built and historic qualities in addition to its natural qualities.	Agree.	Make change to last key spatial challenge to include reference to built and historic qualities
CSRPO/0042/EH	Alan Hunter	English Heritage	N/A	Comment	Section 2.4 makes the connection between the SCS and the CS. Consultation has shown that the community values the conservation of the historic environment and the retention of the areas unique identity, and calls for the protection and enhancement of character and integrity of its villages and landscape character as a means of keeping separate the built and rural parts of the borough. The proposed vision for Darlington reflects much of this thinking. When compared to Para. 3.0.1 however, it can be observed that some overarching aims relating to social equality and cohesion, and carbon footprint are perhaps better expressed there.	Point noted, and will be considered in finalizing the streamlined text needed for the publication version.	No specific change proposed.
CSRPO/0059/NE	Tracy Jones	Natural England	N/A	Comment	Para 9.1.10 There is also a need to ensure no adverse impact on the natural environment.	Agreed	Incorporate in appropriate text paragraph.

LOCAL INFRASTRUCTURE PLAN (LIP)

CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Support	Welcome the provisions of the LIP which provides sufficient detail to support the Core Strategy's proposals and considers that the evidence appropriately covers the HA's infrastructure needs, costs, phasing, funding and those responsible for delivery as required by the guidance set out in PPS12. In particular the Agency welcomes the consideration given to the needs and current limitations of the Strategic Road Network. Full consideration should be given to the latest update of the evidence base, which supports the Area Action Plan.	Comments welcomed and noted	None
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support / Comment	To ensure these are deliverable, the Sequential Test needs to be carried out for areas located within Flood Zones 2 and 3. Section 11.6: Strongly support the details for flood risk and surface water management (Greenfield run off rates). SUDS should be encouraged. Pleased to see that new development along the Skerne will be required to enhance biodiversity. Buffer strips should be created along the watercourse. Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Article 10 of the Habitats Directive stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change. Section 11.7: Pleased to see that the area of FZ3b will be used for flood storage and amenity space. Fully supportive as this follows the approach set out in the Tees CFMP. Strongly support the surface water management proposal. SUDS should be encouraged to achieve the surface water runoff rates. Section 11.9: Strongly support the surface water management proposal. SUDS should be encouraged to achieve the surface water runoff rates. Section 11.10: Strongly support surface water management proposal. SUDS should be encouraged to achieve the surface water runoff rates.	Comments welcomed and noted	The LIP will be amended accordingly.

CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Comment	EA Catchment Flood Management Plan sets out flood risk management policies to deliver sustainable flood risk management for the long term beyond investment period to 2012. 'Mid catchment' contains Darlington; the policy is to take further action to reduce flood risk, applied to those areas where further action to reduce flood risk is most compelling, where there are many people at high risk or where changes in the environment have increased risk. This will require additional appraisal to assess whether there are socially and environmentally sustainable, technically viable and economically justified options. The plan suggests that new or improved defences through Darlington and Croft may be needed under this approach. Further investigation will be required for the provision of future flood defences and structures as there may be downstream effects. A proposed action is to carry out a feasibility study of the potential to install flood defences in Darlington and to protect the main roads including the A1. It suggests that a review of sewer and drainage capacity in Darlington be undertaken to relieve pressure on watercourses and drains that are at capacity. The capacity could be enhanced, if economically justifiable. Working with landowners to develop opportunities for improved floodplain storage should be considered where possible and appropriate for flood risk management. Sustainable land management like buffer strips should be encouraged to help reduce runoff.	Comments welcomed and noted	The LIP will be amended accordingly
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support / Comment	Support the aim to seek contributions for environmental infrastructure. Recommend that a new point be included or alternatively that flood risk reduction is considered as s106 agreements can be used to clarify and establish the appropriate mechanisms for maintenance and/or adoption of Sustainable Urban Drainage Systems (SUDs). Where appropriate, contributions could be made towards a fund to an external provider for SUDs maintenance, provision and implementation of flood alleviation schemes, making space for water, works, improving flood defences consistent with PPS25.	LIP sets out details of known infrastructure provision and key infrastructure to deliver the strategic locations. In appropriate circumstances flood mitigation could be sought under through planning obligations or via condition attached to a planning permission. Although the use of planning obligations, tariffs and CIL or similar funding mechanisms is identified, the use of these matters needs to be more closely cross referenced with the Core Strategy.	The LIP will be amended to clearly cross reference the Core Strategy.
CSRPO/0058/EA	Liz Lightbourne	Environment Agency	N/A	Support	Strongly support the aim to deliver enhanced river corridors and green infrastructure, proposals to enhance and connect wildlife sites flood storage areas and improved surface water drainage systems. But it is It is important to note that the Cocker Beck project is still at an early stage.	Comments welcomed and noted	None
CSRPO/0023/HA	Kyle Maylard	Highways Agency	N/A	Support / Comment	The LIP adequately covers the Strategic Road Network. But the Draft Infrastructure Schedule for funding sources for the A66 improvements is shown just as RFA, it should mention developer contributions as they will be important. The timescales for the first two schemes are difficult to predict accurately as they will be dependant on how fast development comes forward.	Comments welcome and noted.	The LIP will be amended accordingly.
CSRPO/0035/GONE	Mary Edwards	Government Office for the North East	N/A	Support / Comment	This is a thorough and informative document but it would be improved by directly relating the infrastructure provision to the spatial strategy in the Core Strategy. PPS12 Para 4.8 states "The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. Section 11 addresses the strategic locations identified in CS1 but it would be helpful if the infrastructure requirements of other draft policies could be identified too.	Comments welcome and noted. Much of the information required is contained in the document but it is accepted that improved cross-referencing between the Core Strategy and LIP would help the clarity of the document.	The LIP will be amended to identify known infrastructure provision and delivery mechanisms for the Core Strategy policies.
CSRPO/0064/NR	Mr. A Rivero	Network Rail (Infrastructure) Ltd	N/A	Objection	LIP - 8.1.17 + table & table on page 56 Tees Valley Metro Amend to: Phase 1 - 2 new platforms at Bank Top, new airport station (no need for separate entry) and 2 trains per hour (not 4). Cost is more likely to be in the region of £60m. No need for works to Darlington South Junction in phase one. References to car parking should also take into account the need for revised car parking arrangements as a result of the new platforms. Phase 2 - this is the 4 th scenarios.	Comments welcomed and noted	The LIP will be amended accordingly
CSRPO/0064/NR	Mr. A Rivero	Network Rail (Infrastructure) Ltd	N/A	Objection	8.1.15/16, Appendix 4 With the demise of National Express the implementation of the Station Travel Plan is in abeyance as no clear guidance has emerged from the DfT in relation to the interim East Coast franchise and honouring previous National Express commitments. Expect the new ECML franchise to take on many if not all of the agreed station travel plan requirements. Delete references to National Express in relation to the station travel plan. Bank Top station travel plan - with the demise of National Express the implementation of the Station Travel Plan is in abeyance as no clear guidance has emerged from the DfT in relation to the interim East Coast franchise and honoring previous National Express commitments. We would expect the new ECML franchise to take on many if not all of the agreed station travel plans requirements. DELETE any references to National Express in relation to the station travel plan.	Comments welcomed and noted	The LIP will be amended accordingly

CSRPO/0064/NR	Mr. A Rivero	Network Rail (Infrastructure) Ltd	N/A	Objection	Para. 4.1.14 et.al. National Express is no longer the train operating company for Darlington station. The running of the ECML has been taken back into Government ownership (East Coast) but is likely to be re-franchised in late 2011. All references to National Express should be deleted. Reference should be made to the interim arrangements and likely new franchise. "National Express" is no longer the train operating company (TOC) for Darlington station. The running of the ECML has been taken back into Government ownership ("East Coast") but is likely to be re-franchised in late 2011. All references to "National Express" should be DELETED throughout the document. Reference should be made to the interim arrangements and likely new franchise.	Comments welcomed and noted	The LIP will be amended accordingly
CSRPO/0048/WARD	Timothy Wheeler	Ward Hadaway	N/A	Support / Objection	Consider it to be a worthwhile exercise in terms of setting out the likely programme of social infrastructure works, which may be required during the plan period. Unsure as to how the delivery mechanism would work. Would this be via a continuation of existing s106 practice, a more refined tariff based system, or even via the application of the new CIL arrangements, should these ever come into force due to political considerations. The adopted approach must provide certainty and predictability for the development industry.	The LIP sets out a programme for known infrastructure delivery and the identified infrastructure providers. It also states that where there are gaps in provision planning obligations, tariffs and/or CIL or other funding mechanisms would be considered and used appropriately.	None
CSRPO/0041/CDDN HS	Nicholas Lawrence	County Durham & Darlington NHS Foundation Trust	Eko Planning (North) Limited	Comments	Text to be included in Local Infrastructure Plan The Trust provides hospital services from 3 main sites: Bishop Auckland General Hospital, Darlington Memorial Hospital, and University Hospital of North Durham. Under its commitment to provide services as close to patients' homes as possible the Trust, aside from providing healthcare facilities from its three main sites runs two community hospitals at Shotley Bridge and Chester-le-Street together with outpatient, community and outreach services from other sites as well as community based services such as the 'hospital at home'. There is realisation by the Trust that over the next few years, more services will be provided closer to home, avoiding unnecessary travel and reducing the need for hospital visits. The Trust has around 5,000 staff and 1,257 beds. It provides secondary care district general hospital services to a population of around 500,000 in County Durham and Darlington and into North Yorkshire, with sub-regional services reaching into the South of Tyne area, serving a population of some 1.2 million. The trust also provides services to the populations of the Primary Care Trusts (PCTs) in County Durham and Darlington and also to other PCTs outside the geographical boundaries of the Trust. Within the Borough the primary site for healthcare provision is the DMH, which currently employs 2,200 staff with 418 beds. It is also a major employer within the Borough. Additional text to be added to paragraph 9.2.3: Although the Urban Fringe is the area expected to deliver the greatest number of new dwellings, it does not follow that new health services should be located there. The need is also dependant on the structure of the population they serve, the need to replace or refurbish existing facilities and the impact of service changes and advances in technology. The clinical model has already affected service delivery that may require future infrastructure investment at the DMH (I.e. from the DMH sharing with the University hospital of North Durham and the Accident and Emergency service from the withdrawal of that service from Bishop Auckland). Also the proposed resident population and employment growth envisaged within the CS will have an effect on the type and level of service provided at the DMH, which will have an impact upon infrastructure requirements within and beyond the plan period. House building targets will be taken into account when reviewing health facility requirements, attendant infrastructure requirements. Costs / Funding Sources: Aside from the sources identified, within the LIP, developer contributions may be used to deliver additional health service facilities.	Comments welcome and noted.	Text will be added to the revised LIP.
CSRPO/0066/NGRID	N/A	National Grid	N/A	Comment	National Grid previously commented on the draft in July 2009 and has no information to add.	Comments welcomed and noted	None
SUSTAINABILITY APPRAISAL (SA)							
CSRPO/0033/ONE	Wendy Hetherington	One Northeast	N/A	Comments	The contents of the report are noted and I confirm that the Agency has no specific comments to make regarding this report.	Noted	None