

CORE STRATEGY: PREFERRED OPTIONS 2008 CONSULTATION RESPONSES

1 INTRODUCTION

CSPO Ref	Respondent	Comments
CSPO 039	Heighington & Coniscliffe Councillor	Paragraph 1.3 Only small plot of land in Heighington Lane in Darlington. A planning application has been approved for the construction of warehouses on this site. All DBC land in Heighington Lane has been used. <i>Proposed changes: Acknowledge approved development in Heighington Lane but confirm that there is no further permitted development in Heighington Lane.</i>
CSPO 072	English Heritage	Paragraph 1.1.1 In order to influence the Core Strategy it would be helpful to be able to influence the Sustainable Community Strategy. Unfortunately, were not given the opportunity to comment on the SCS.

2 A SPATIAL VISION FOR DARLINGTON

CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	P11 considered to contain high level of unproven speculation
CSPO 027	CPRE, Darlington District Committee	Paragraph 2.1.2 The crux of the matter – a balance needs to be found
CSPO 027	CPRE, Darlington District Committee	Paragraph 2.1.5 The continued existence of independent retailers is an important reason Darlington is different and attractive.
CSPO 027	CPRE, Darlington District Committee	Generally support the Vision. Curious as to the use of the word 'city' as Darlington has a charter as a Borough and would not expect to achieve one as a 'city'. Concern expressed at the use of 'ambitious' which could be interpreted as making the urban area larger, which CPRE would not wish to see.
CSPO 031	One NorthEast	Revisions to the Vision are appropriate.
CSPO 037	Highways Agency	CSIO 'comprehensive network... transport routes' has been removed and now no reference to provision and promotion of sustainable transport infrastructure, essential to facilitate reduction in need to travel by car. Pertinent as CSIO recognised increase in commuting in Borough. <i>Proposed changes: Issue of sustainable transport warrants consideration in main text of vision</i>
CSPO 039	Heighington & Coniscliffe Councillor	Paragraph 2.2.3 Phrase 'Some greenfield sites will be needed for new development' too vague, lacks detail. <i>Proposed changes: Any greenfield site under consideration to be discussed through consultation with appropriate Parish Council prior to any decision taken - all in keeping with true 'consultation' and 'community involvement'</i>
CSPO 039	Heighington & Coniscliffe Councillor	Delighted that more reference made to rural areas, particularly in protecting integrity and distinctiveness of both town and country BUT currently too vague. <i>Proposed changes: needs to recognise and maintain village development boundaries as specified in current Local Plan.</i>
CSPO 046	Turley Associates for Durham Tees Valley Airport	Lack of reference to DTVA as economic driver' mentioned in reponse to CSIO, suggested amendment to text. In CSPO, no objective added to this effect and neither vision or objectives make specific reference to airport. Consider lack of reference to DTVA

		<i>Proposed changes: First para of Vision should make reference to benefits which DTVA brings to wider area and importance of DTVA to improving connectivity of Borough to international markets.</i>
CSPO 051	Natural England	2nd paragraph - not clear what is meant by distinctive location in the retail, tourism and cultural landscapes. 5th paragraph - recognition of biodiversity should not be confined to the countryside but fully integrated across all areas linking countryside to urban and residential areas through multifunctional green infrastructure networks. Open spaces, even gardens, can make a significant contribution to biodiversity and protected species including bats, breeding birds and great crested newts are likely to use buildings, wetlands and habitats in urban, suburban and urban fringe areas. There is a need to integrate the protection and enhancement of biodiversity and geological conservation across the plan area into the Vision, recognising this as part of strategic multifunctional green infrastructure.
		<i>Proposed changes: add to second paragraph - add 'the special character of towns and villages' and that the location and design of new development should also allow opportunities for the natural environment to adapt to the consequences of climate change. The vision should recognise geodiversity/geological conservation as in 2.2.4.</i>
CSPO 057	John Lavender, PlanArch Design Ltd (Lingfield Investments/Marchday)	Amend vision.
		<i>Proposed changes: add to the first paragraph 'a rolling program to bring forward strategic mixed-use sites like Central Park with public sector support, and Lingfield Point with major private investment, will form the cornerstone of the employment land supply'.</i>
CSPO 064	Barton Willmore for St Modwen Developments	Broadly support the Vision especially as it is stated that underused land and buildings will be used for new housing, in line with PPS3, para 36.
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	Support, recognises and aims to develop Darlington as the physical and economic gateway to the Tees Valley City Region and North East England. Expanding local opportunities for work by the provision of high quality, sustainable employment sites is essential if Darlington is to capitalise on its strategic location, communication links and skilled workforce. Wide range of high quality, accessible sites in and on the edge of the urban area will attract employers and local enterprises that might otherwise not be attracted to the region, essential for economic diversification, the delivery of sustainable economic growth and higher paid jobs. Bringing forward strategic employment sites for prestige employment and mixed-use development on sites of limited amenity value on the urban fringe will give added prominence to the region, aiding economic regeneration whilst capitalising on the principal growth sectors, particularly large sites for logistics, to increase inward investment.
CSPO 072	English Heritage	Para 2.1.2 - welcome recognition that one of the key spatial planning challenges facing the Borough is conserving the valued qualities of the built and natural environment from which it derives its local distinctiveness.

		<i>Proposed changes: would be improved and better relate to the Theme 6 and the Objective by specific reference to the Borough's historic environment.</i>
CSPO 072	English Heritage	Para 2.2.3 - welcome the intention to address matters concerning the tourist potential of Darlington's heritage; the character and integrity of villages and their relationship to the town; and the protection of the Borough's landscape character.
CSPO 072	English Heritage	Paragraph 2.2.6 welcome commitment to enhancing the quality of the local environment, building on the distinctive historic qualities of Darlington as a market town and the attractiveness of the surrounding villages and countryside.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	Amend first sentence.
		<i>Proposed changes - The first sentence should read '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, expanding local opportunities for work and the provision of healthcare services that meets the need and is within reach of local people.'</i>
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	The spatial vision looks to form more socially cohesive sustainable communities and at the same juncture reduce certain disparities. However, the list of disparities does not include addressing health inequalities, which form a key element of the aspiration at national and local level to provide well-balanced and socially inclusive and cohesive communities (PPS1, PPS3, PPS6, One Darlington: Perfectly Placed and the Preferred Options Core Strategy). The fourth sentence should be expanded to include the provision of healthcare and also provide for redevelopment. Such an approach accords with the requirement of flexibility, which is a fundamental element for a compliant LDF as set out in PPS12.
		<i>Proposed changes: The 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.'</i>
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	The Themes deal with each of the subject headings of the Core Strategy, save for the provision of healthcare despite being referred to under section 8 – A Healthy and Safe Darlington. This is a clear omission allowing for the advice in PPS12 (section 4) that the provision of such a service is a key strategic driver to secure an inclusive, sustainable, durable and socially cohesive Darlington and its communities. Whilst Theme 6 does reference health it is only as one of a number of facilities rather than as a separate entity. A new theme should be added to accord with the test of soundness and enhance the plan's flexibility, enabling it to deal with the changing nature and needs of health provision and the Trust itself.
		<i>Proposed changes - The 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.'</i>

OBJECTIVES		
CSPO Ref	Respondent	Comments
CSPO 017	Youth Forum Area 4 Event	Liked great schools
CSPO037	Highways Agency	Generally support. Welcome reference to objective 3. Previously supported Objective 9. CSPO version no longer refers to sustainable accessibility and minimising need for travel.
		<i>Proposed changes: Objective 8 should refer to 'improving sustainable links', promotion of demand management measures, travel plans, integrated transport systems and influencing travel behaviour as means of improving sustainable transport and accessibility prior to physical infrastructure improvements.</i>
CSPO/046	Turley Associates for Durham Tees Valley Airport	Amendment needed.
		<i>Proposed changes: Add new cross cutting objective 'Enhance the competitiveness of local businesses by supporting improved connectivity by road, rail and air to other UK and European regions and markets'.</i>
CSPO 051	Natural England	Cross cutting 1 should allow for the natural environment to adapt to the effects of climate change. This should include ensuring the integrity of intact habitat networks linking areas throughout and outside the plan area to allow species and habitat movement to adapt to changing conditions. Sustainable drainage schemes should also be used to help secure the integrity of natural systems as well as contribute to flood alleviation and management. This should include encouraging modal shift from private motorised transport. Recognising this will help address causes of climate change and encourage the good health and wellbeing
CSPO 051	Natural England	Objective 7 should recognise the value of informal recreation opportunities as well as formal facilities in contributing to the well being of people. The multifunctional use of green infrastructure can play a significant role in this, allowing for walking, cycling, volunteer involvement, social interaction. These provisions will contribute to individuals health across the age spectrum.
		<i>Proposed changes: replace 'preserve and strengthen' with 'protect, maintain and enhance'. Question the use of term 'unique' character. Add habitats and 'species'. Add 'local' distinctiveness.</i>
CSPO 062	Big Tree Planning Ltd	Objective No. 4 Both Middleton St George sites sites are suitable and available for residential development, are capable of delivering a wide mixture of housing types including affordable and lifetime housing, taking into consideration the identified 'need' in designing the proposed mix and tenure for each site.
CSPO 064	Barton Willmore for St Modwen Developments	Support Objective 1, 3 and 4.

CSPO 064	Barton Willmore for St Modwen Developments	Wish to clarify Objective 7. It is unclear what 'preserve and strengthen the scale' means in this context of Darlington's neighbourhoods and villages in particular. Does this mean 'to grow bigger'? If so, then this would be out of step with national and regional guidance (RSS Policy 4) and settlement hierarchy, villages being a lower priority for growth. The Growth Point document is clear that the housing offer in the Tees Valley should 'encourage people to live in the heart of the region, rather than the new suburbs, rural towns
		<i>Proposed changes: Amend Objective 7 to provide greater clarity on the term 'scale' as there is the potential for the Core Strategy to be found to be 'unsound' in that it is not consistent with national policy (PPS12, para 4.52).</i>
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	Amend Objectives 1 and 8.
		<i>Proposed Changes: 1. Minimise the impact of climate change and reduce greenhouse gas emissions and waste through sustainable designs and patterns of development where this is appropriate and commercially viable. 8. Support initiatives to maintain, expand and enhance facilities and networks for public transport, walking and cycling so that everyone is able to get round the Borough easily and affordably whilst making the most of Darlington's existing transport infrastructure, tackling congestion and managing road networks more effectively as well as improving links to the rest of the Tees Valley and</i>
CSPO/072	English Heritage	Two of these are cross cutting and are followed by six relating to specific themes. It is unfortunate that the chapters do not relate well to the way in which these objectives are set out.

3 ACHIEVING A MORE SUSTAINABLE COMMUNITY

3.1 Darlington's Sub Regional Role and the Locational Strategy

CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Paragraph 3.1.4 Question source of 'population growth of 10%'
CSPO 013	Central Ward Partnership AGM	Need for prioritization of development in the Borough given current market downturn.
CSPO 013	Central Ward Partnership AGM	Question potential growth in population over plan period, given recent past stable population
CSPO 039	Heighington & Coniscliffe Councillor	Paragraph 3.1.7 Cattle Mart development - this is presumptuous and suggests predetermination particularly when there is an imminent application for a Cattle Mart Development in the pipeline. Puts pressure on Officers and Members to approve.
		<i>Proposed changes: Any Cattle Mart Development will accommodate agricultural related businesses only and land will only be released to duplicate the existing facility with a small percentage increase for vehicle access and parking.</i>
CSPO 046	Turley Associates for Durham Tees Valley Airport	Para 3.1.2 highlights Borough's connectivity, does not make reference to wider benefits of improved connectivity that DTVA brings. Support reference to Darlington being considered a 'gateway' to the Tees Valley City Region in paras 3.1.2 and 3.1.8

CSPO 053	Government Office for the North East	Paragraph 3.1.2 refers to 'housing need arising out of the continued expansion of Catterick Garrison' and 'projected population growth of some 10% by 2026' but it is difficult to see how these major potential impacts on Darlington are reflected in CS1 and the housing policies.
CSPO 053	Government Office for the North East	Paragraph 3.1.11 refers to 'service villages' and 'main villages' which are terms not mentioned again.
CSPO 057	John Lavender, PlanArch Design Ltd (Lingfield Investments/Marchday)	Paragraph 3.1.5 Should promote mixed use development at Lingfield Point to accord with RSS and to promote highly sustainable inclusive mixed communities that enjoy good access to a nearby town centre. Would be consistent with Government policy, so that places to work are located alongside places to live and play. These objectives are key to the Lingfield Masterplan which will improve the viability, volatility and townscape of eastern Darlington. The proposals are the largest regeneration project in a single ownership proposed in Darlington, which suggest spatially, Lingfield Point is vital to the long-term future of Darlington.
		<i>Proposed changes: Alter the final sentence to make reference to Lingfield Point '.....also suggests promoting linked mixed-use development in and around the northern and eastern fringes of the town centre such as Lingfield Point.'</i>
CSPO 062	Big Tree Planning Ltd	Paragraph 3.1.3 If a site is allocated for nature, heritage conservation or recreational purposes, its development potential should not be discounted. The wider benefits of certain development proposals (e.g. affordable housing schemes in areas with an identified need) can outweigh the importance of a site allocation and should be favourably considered. In considering the sequential approach to development, the criteria in paragraph 38 of PPS3 should be considered.
CSPO 062	Big Tree Planning Ltd	Paragraph 3.1.9 the Borough's villages and countryside could support a mix of residential schemes including affordable housing and lifetime homes. In allocating sites for housing the Council should look favourably upon these sites for a mixture of residential development.
CSPO 064	Barton Willmore for St Modwen Developments	Paragraph 3.1.6 approx 120ha of land at Faverdale has been identified for distribution and logistics. 'significant new office space' is being planned in Beaumont Street/Feethams area of the town centre. For the Whessoe Road site, a draft Employment Land Review has been submitted to the Council for comment identifying a substantial amount of commercial property which taken alongside decreasing levels of demand for floorspace and take-up rates, means there is a surplus of commercial property in the Borough at present, especially secondary office stock and large industrial units.
		<i>Proposed Changes: should make provision for the release of underused, vacant and derelict employment land for alternative uses, including residential. This would be consistent with national policy and the requirement to use land efficiently and effectively.</i>
CSPO 064	Barton Willmore for St Modwen Developments	Para 3.1.7 states that there is an opportunity to enhance the 'Town Centre Fringe'. It is unclear what this 'opportunity' is and how it has arisen. Can the same be said for the area to the west and the south of the town centre. CS1 should not be used to justify development in this location that would prejudice the vitality and viability of the town centre.

		<i>Proposed changes: 'Town Centre Fringe' should be better defined on the Key Diagram and the 'opportunity' to enhance the area should be detailed.</i>
CSPO 072	English Heritage	Paragraph 3.1.3 There will be occasions when development is constrained by the need to safeguard heritage assests, but much of our historic environment need not be 'avoided', rather utilised in a positive and constructive way to help bring about social wellbeing and economic regeneration.
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	The community needs to be retained at Faverdale rather than it just being a housing estate in the middle of an industrial estate.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	Paragraph 3.0.1 the aspirations of residents and those working in the Borough in sustainable community terms can be met in socially cohesive ways. Does not provide the flexibility required under the soundness tests and is not consistent with PPS1. Should refer to the provision of healthcare and community facilities in helping to achieve a more sustainable community.
		<i>Proposed changes: Add the words 'and socially cohesive' between the 'environmentally' and 'ways' in the second sentence of paragraph 3.0.1. Paragraph 3.0.1 should be read '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'.</i>
POLICY CS1 - Darlington's Sub Regional Role and Locational Strategy		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	A map should be included.
CSPO 009	Eastbourne Event 121108	Not enough land available for a mixed use development, development would be too concentrated and not enough public open space.
CSPO 012	Mr S Howarth	Existing cattle mart location is intrinsically linked to the Council who has an obligation to find a suitable location within existing industrial sites, not as proposed, a mega development in a greenfield location, with 10% used at cattle mart. The scale of the new cattle mart must be reflective of need.
		<i>Proposed changes: restrict cattle mart location to east of A1, possibly east of A68/A1M junction, as close as practical with little impact on hedgerows and areas of natural beauty. Ensure the actual need is identified. It should not be development driven.</i>
CSPO023	England & Lyle (Ward Bros Steel Site)	Proposed residential development at Ward Bros site, within walking distance of North Road Local Centre and Darlington Town Centre, will assist in the delivery of the aims and objectives of CS1.
CSPO 024	England & Lyle (Green Street Motors Site)	Support the concentration of new development in sustainable locations. Potential residential development of the Green Street Motors site, within walking distance to North Road and Darlington Town Centre, will assist the delivery of the aims and objectives of CS1.
CSPO 025	England & Lyle (Cleveland St Site)	Support concentration of new development in sustainable locations. Site is within walking distance of both North Road Local Centre and Darlington Town Centre.

CSPO 027	CPRE, Darlington District Committee	Support, except for the last para which lacks precision. Understand 'rural needs' follows Local Plan Policy E2 to permit affordable housing as well as agricultural or forestry developments. This is not clear in this policy which could be interpreted in many different ways and result in unsuitable development.
		<i>Proposed changes: Define 'rural needs', perhaps by use of a glossary.</i>
CSPO 027	CPRE, Darlington District Committee	How will applications for residential caravans be dealt with under this policy?
		<i>Proposed changes: Define how residential caravans will be dealt with, perhaps by use of a glossary.</i>
CSPO 031	One NorthEast	Support CS1 which acknowledges Darlington as being an area which can accommodate growth and where inward investment should be promoted and targeted. This ensures that the economic context and aspiration for the city region match those in the RES.
CSPO 032	Peter Wellings	New development and regeneration should be initially on brownfield sites and the town should not spread into the countryside. A1(M) should form natural barriers to extension on the west and A66 a barrier to the south and east. New developments should not compromise the integrity of the Borough's villages and should be on infill sites in the village envelope. Development should not be allowed in conservation areas or in areas of high landscape value. All green spaces within the town boundaries should not be encroached upon. Should reduce private car use by improving public transport. Existing bus routes are too long.
CSPO 033	Mr John and Mrs Valerie Whitby	Rural needs - not for affordable housing outside village boundaries. Do not demolish for the sake of profit.
CSPO 035	Sadberge Parish Council	Support as it retains the current development limits for Sadberge, in particular the village development limits identified in the Parish Plan.
CSPO 035	Sadberge Parish Council	Agree with 'good access for all...'(p17). In the case of Sadberge, provision of an effective bus service is very important for residents who do not have access to cars but are aware that the provision of bus services is not directly within the scope of the LDF.
CSPO 035	Sadberge Parish Council	A key issue is the volume of traffic and the number of heavy vehicles passing through Sadberge. Parish Plan traffic survey data and other evidence shows that Sadberge is being used as a 'rat run' for drivers avoiding the congestion around the north-east and east of Darlington caused by the traffic generated by the Darlington Gateway Strategy and the lack of a bypass around the north-east of Darlington. CS1 includes the 'urban periphery east' and 'Durham Tees Valley Airport area' as a priority area for new development and the Eastern Transport Corridor is opening up land for development. Development these areas has potentially serious implications for the volume of traffic in the area to the east and north of Darlington.
		<i>Proposed changes: include 'development will only be permitted if the transport infrastructure is capable of handling the traffic that will be generated by that development.'</i>

CSPO 037	Highways Agency	Welcome focussing development towards most sustainable locations, but does not identify what enhancements are required to support the delivery of development proposals in locations identified. Circular 02/2007 promotes 'alternatives to building new roads...through better network management and making smarter choices easier'. In line with Guidance on Transport Assessments, mechanisms should be introduced that reduce the need to travel, particularly by private car as well as maximising sustainable accessibility to sites, particularly by public transport. As a last resort physical improvements should be sought to the network and demand management measures would be looked at first before provision of
		<i>Proposed changes: improvements should be supported by appropriate evidence which identifies the potential impact of development proposals on existing infrastructure, in particular the SRN, details as to what infrastructure enhancements are proposed/required, the level of mitigation they will provide and how they will be delivered. There would be concern if development proposals were dependant on the delivery of</i>
CSPO 037	Highways Agency	Town centre sites (a, b and c) are likely to offer the most sustainable areas. For the progression of d, e and f, a detailed analysis of the sites particularly in the east and at the airport is required, early consultation is required.
CSPO038	England & Lyle for Northumbrian Water Ltd.	Support broad locations for future development in CS1 but the planned growth over the plan period is a significant increase. At first assessment would exceed the planned capacity of the Stressholme Sewage Treatment Works. A detailed growth assessment would be required against the capacity allowed for in current scheme to include all factors such as migration, household size, employment development. Future development at Teesside Airport would drain to the new pumping station, depending on the scale of the development, foul sewage may be accommodated by an extension of the pumping station. Any proposals to deal with de-icing flows from the airport would require an extension of the Stressholme STW.
CSPO 039	Heighington & Coniscliffe Councillor	The people who should decide on the 'need' for development to support 'vitality and viability of village' are residents.
		<i>Proposed change: prior to any small scale development in any village, consultation will be held with the Parish Council and residents. Detailed information will be supplied to the community to allow them to make a valued decision.</i>
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Support. Welcome identification of Urban Periphery North West as a strategic location within which priority will be given to the delivery of new development and regeneration activity.
CSPO/044	Environment Agency	Should any of these areas lie within Flood Zone 2 or 3, and are therefore at risk of fluvial flooding, should be subject to a Sequential Test
CSPO 045	GVA Grimley for Durham Constabulary	Support concentration of new development and regeneration in the Town Centre Fringe as this is the most sustainable location for growth. Object to CS1, Faverdale is not included as one of the identified strategic locations when the plan recognises that the RSS has identified approx 120ha at Faverdale for new employment uses.

		<i>Proposed changes: Faverdale should be identified as one of the key strategic locations for new development.</i>
CSPO 046	Turley Associates for Durham Tees Valley Airport	Support references to airport in para 3.1.8 and CS1.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Support aims of CS1 in terms of securing growth. Support the location of the Great Burdon site within the Urban Periphery East area. This and Bishopton Lane provide sustainable locations adjacent to the main urban area.
		<i>Proposed changes: Bishopton Lane site should be included within the Periphery east area.</i>
CSPO 049	John Stoney	Darlington needs to be a bit bigger and richer to be able to sustain itself as an independent unitary authority. Attracting jobs is key, ideally most people who live in Darlington should work in Darlington and vice versa. Darlington should not be afraid to position itself as an attractive town to live in even if you work elsewhere. With its key transport links, ought to provide good conference facilities for the whole North East. For historical reasons Harrogate does well, away from an airport, main road or mainline railway.
CSPO 051	Natural England	Would identified rural needs preclude opportunities to develop farm diversification projects linked to green tourism or nature based tourism?
		<i>Proposed changes: clarify what is meant by 'identified rural needs'</i>
CSPO 053	Government Office for the North East	Object, conflicts with PPS12 para 4.1(3) and para 4.5. CS1 identifies 6 strategic locations but fails to indicate what form the development will take, how much and when it is expected to be delivered. These sites should be clearly identified on the key diagram and referred to in CS1. Having established the 6 strategic sites, the following policies should provide more detail. These policies add little spatial detail and introduce new location names e.g. Faverdale and Lingfield.
CSPO 053	Government Office for the North East	PPS12, para 4.38 states that 'The ability to demonstrate that the plan is the most appropriate against reasonable alternatives delivers confidence in the strategy.' The options should be alternative strategic spatial options, sufficiently distinct and clear to highlight the different sustainable implications of each so that meaningful comparisons can be made. Strategic options are briefly outlined in the para 3.1.11 in relation to CS1 but there is a lack of clarity about what these strategic options are. It should be made clear that it remains open to consultees to express a preference for any option, including those rejected by the Council. The plan would fail this test of soundness in relation to the most appropriate strategy.

CSPO 054	Mr J Sturrock	Fails to identify a settlement hierarchy for villages in the Borough to guide residential development outside the urban area. Makes reference to support the vitality and viability of the Borough's villages, can only be delivered through additional housing in those settlements e.g. Bishopton, that have a range of services worth protecting. Should differentiate between 'service' villages such as Bishopton that has a school, two pubs, regular bus route and other community facilities and 'non-service' villages that have no services. Housing development in the service villages would be sustainable and achieve important social and economic benefits whilst housing in non-service villages would be unsustainable. Review the development limits of service villages and in broad terms quantify how much housing development should be collectively provided in the service villages. This will allow local rural housing needs to be met on the basis of a clear
CSPO 055	England & Lyle	Support the Town Centre Fringe as a strategic location for new mixed use development including housing. Should be made clear in CS1 that the Town Centre Fringe does not just refer to the land east of St Cuthbert's Way as implied in the supporting text but also includes the area of land north of the Town Centre including the Weir Street area.
CSPO 056	England & Lyle (Coniscliffe Grange Farm)	Support the locational strategy, but need to ensure that there is a balance of housing types and environments to meet housing aspirations and avoid town cramming. There is a need for further large family housing on the edge of the urban area to meet demands and support economic growth. The Wynyard development has had a significant impact in attracting and retaining businesses to the Tees Valley bypassing Darlington; the Borough must offer a similar environment. To meet this need, CS1 should identify land to the west of Darlington at Coniscliffe Grange Farm (plan attached) as a strategic location for new housing development in addition to, or in place of existing options. Other sites do not offer such an option. CS1 is not sound as it is not justified. It is not the most appropriate or effective strategy when considered against the reasonable alternatives, as will not lead to the delivery of the plan's vision and objectives.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	The locational strategy broadly follows the RSS sequential approach, enough flexibility should be 'built in' so as to not prejudice any large fully 'deliverable' allocations brought forward as part of the SHLAA process. The large 865 unit development at Beaumont Hill is in accordance with PPS3 in that it is considered deliverable now, given that detailed planning proposals have been prepared (document enclosed).
		<i>Proposed changes: Include the 865 unit strategic opportunity in the general strategy</i>
CSPO 062	Big Tree Planning Ltd	CS1, Para 4 states that 'only development that supports the vitality and viability of the village, its services or the rural economy will be supported'. An example of this is affordable housing which can be provided by Hunters Green and St Margarets Close sites, Middleton St George.
CSPO 063	Coilliers CRE for Lingfield Properties (Darlington) Ltd	Support. Growth, development and enhanced infrastructure will help Darlington fulfill its potential and role as a sub-regional centre. The identification of (e) as a priority for new development and regeneration is supported but should be extended.

		<i>Proposed change: The area 'Urban periphery east' should be extended to include the 20 acres owned by Lingfield Properties (Darlington) Ltd., to the east of Lingfield Point. This should be designated in the forthcoming Site Allocations Document and Proposals Map.</i>
CSPO 064	Barton Willmore for St Modwen Developments	There is no differentiation between the 'strategic sites' that have been identified as the priority areas. CS1 does not take into account RSS Policy 4, which sets out a sequential approach to development. No mention is made to the use of previously-developed land, which should form the first priority within urban areas. CS1 is inconsistent with national and regional planning policies and is unsound.
		<i>Proposed changes - Amend to clarify that previously-developed land should form the priority for development in all locations. The proposed strategic locations should be split into tiers in order to align with RSS Policy 4. Add to CS1 'New development and regeneration activity in the Borough will be concentrated on previously developed land in sustainable locations [term to be defined] with priority being given to delivery in accordance with the following hierarchy: (a) Darlington Town Centre; (b) Darlington Urban Area; (c) The Strategic Development Areas of: • Town Centre Fringe; • Central Park; • Urban Periphery North West; • Urban Periphery East; • Durham Tees Valley Airport Area (airport related employment uses); (d) Darlington's Villages.'</i>
CSPO 064	Barton Willmore for St Modwen Developments	'Sustainable locations' needs to be defined either in the supporting text/Glossary. CS1 should not be used to justify development in this location that would prejudice the vitality and viability of the town centre.
		<i>Proposed changes: CS1 should be amended to: 'Development within the Strategic Development Areas as listed in the hierarchy (above) should be in accordance with all other plans and policies of the Local Development Framework.'</i>
CSPO 065	DPP, for Tesco	CS1 provides a positive policy framework for the growth, development and enhancement of Darlington in accordance with its role as a sub-regional centre and key location in the Tees Valley City Region. Support is given to the policy to encourage further development within the Borough allowing Darlington to fulfil its role and function.
CSPO 066	Nathaniel Lichfield and Partners for Barratt Homes (North East) Ltd.	Promotion of Darlington as a key centre, accommodating increased population and growth in the Tees Valley Region is supported. Development in and adjoining the main urban area and strategic locations in CS1 is supported. Giving 'priority' to development within the identified strategic locations should not limit development in other sustainable locations which could help deliver Darlington's sub-regional objectives. Object to the final two paras of CS1 as there must be sufficient developable land within the village limits to enable an appropriate level of development to support their viability, vitality and service role.
		<i>Proposed changes: amend CS1 to enable development adjoining village settlement limits, making reference to development which addresses 'local housing needs' in addition to 'viability' and 'vitality'</i>

CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Without a SHLAA, there is not a robust evidence base to confirm that projected growth can be flexibly accommodated at the priority strategic locations identified (PPS3/PPS12). An additional priority location to the south of the Skerningham strategic countryside site is proposed comprising housing, community use and the countryside site. As part of the assessment of new development in Darlington and the need to remove through traffic from streets in the north of the town, the Structure Plan required the feasibility for the construction of the A66 Darlington Bypass (north). <u>Broad vision for the area enclosed.</u>
		<i>Proposed changes: 'New development and regeneration activity in the Borough will be concentrated on sustainable locations within and adjoining the main urban area, with priority being given to delivery in the following strategic locations: (a) Town Centre; (b) Town Centre Fringe; (c) Central Park; (d) Urban Periphery north west; (e) Urban Periphery east; (f) Urban Periphery north east; (g) Durham Tees Valley Airport area (airport related employment uses)'</i>
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Consistent with RSS policy 10, recognises Darlington's important role as sub-regional centre and strategic public transport interchange serving a district catchment area. With Darlington's unique location, market town status, would enable the town to attract employment, which may not otherwise locate in the Tees Valley or North East.
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Without a completed SHLAA (PPS3/PPS12) there is not a robust evidence base to confirm that projected growth can be accommodated at the priority strategic locations identified in CS1 for the plan period. There is a requirement to build flexibility into the locational strategy and ensure growth in Darlington is not constrained. Another priority location should be added.
		<i>Proposed changes: Include 'Urban Periphery North East' as land adjoining the main urban area to the immediate south of the proposed strategic countryside site at Skerningham.</i>
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	CS1 should recognise and develop Darlington's strategic role as a key sub-regional centre in the Tees Valley City Region and contribute to growth of the regional economy. Should develop Darlington's connectivity in the Tees Valley Region and beyond. New development should be concentrated in sustainable locations in and adjoining the urban area; greenfield sites of low amenity value on the fringe will capitalise on Darlington's location, accessibility and attractive environment, and if identified for prestige employment use, will encourage inward investment which may not otherwise be attracted to the region. There should be a choice of development sites to attract new investment (PPG4/Draft PPS4), their promotion when they arise, as well as targeting opportunities for identified growth sectors, is the most flexible option to attract investors, especially in logistics.
		<i>Proposed changes: ADDITION OF - Existing allocations will continue to be brought forward for</i>
CSPO 072	English Heritage	Paves the way for subsequent policy that ensures the historic environment is an integral part of this drive.
CSPO 073	Alan Cave for The Miller Group	Delivery of strategic locations is supported. It is essential that key villages in sustainable locations (eg well served by buses) are enabled to thrive and possibly expand to help meet local needs.

		<i>Proposed changes: 'within the Borough's villages, particularly those well served by public transport, only development that supports the vitality and viability of the village, its services or the local economy, will be supported. The additional housing needs and increasing shortage of PDL may require selective review of village boundaries.' Last para - delete 'rural' insert 'local'.</i>
CSPO 074	North East Assembly	Consistent with RSS policy 6 but it is unclear how the sequential approach in RSS policy 4 will be implemented.
		<i>Proposed changes: Reference to the prioritisation of the use of previously developed land would be welcomed.</i>
CSPO 076	England & Lyle for Mrs Hartley (Land at Burtree Lane)	Existing development limits around the main urban area should be revised in light of proposed housing needs. An extension of the existing development limits to incorporate allocation of the Burtree Lane site will enhance the soundness of CS1.
CSPO 077	England & Lyle for Mr Metcalfe (The Paddock)	CS1 should identify a settlement hierarchy to differentiate between service and non-service villages in the Borough. Existing development limits at Bishopton should be reviewed and extended in light of proposed local housing needs to incorporate allocation of The Paddock. Will enhance the plan's soundness and contribute towards the most appropriate and robust supply of housing in Borough.
CSPO 080	Coatham Mundeville Parish Meeting	CS1 is relevant to all villages in the ward. New development and regeneration in strategic location (e) Urban Periphery East must not be allowed to 'crowd out' the present rural area by being allowed to minimise or reduce the gap between the urban and rural areas.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	Para preceding the strategic locations refers to new development and regeneration but does not cover re-development. To ensure that existing sites, such as the Darlington Memorial Hospital site can be redeveloped without being contrary to CS1 greater flexibility is needed and the para needs to be amended.
		<i>Proposed change: First part of the third paragraph of CS1 to read 'New development, re-development and regeneration activity....'</i>
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	CS1 seeks to establish a sequential approach to development. Provision of healthcare facilities to serve the population should not be restricted by the sequential approach, as healthcare services will demand locations that are focussed upon the communities they serve rather than the rigidity of the tiered sequential approach. To ensure that CS1 is flexible and allows strategic healthcare development to be delivered consistent with PPS12, CS1 should be amended.
		<i>Proposed changes: CS1 should reflect that healthcare development should not be curtailed by the sequential approach, as the adoption of such a rigid test will not facilitate the achievement of socially cohesive and inclusive communities. After strategic location (f) a new para should be added 'The sequential approach is an overarching policy objective and each development, re-development and regeneration that certain development forms e.g. healthcare, due to their nature and functional requirements demand locations that fall outside the sequential approach test will allow the achievement of socially cohesive and inclusive communities. Each development proposal will be considered on its own merit and have regard to other policies in the Core Strategy.'</i>

3.2 Promoting High Quality Design		
CSPO038	England & Lyle for Northumbrian Water Ltd.	Paragraph 3.2.4 Supports the references to water efficiency, flood risk and drainage
CSPO 039	Heighington & Coniscliffe Councillor	Paragraph 3.2.4 Higher standards for residential development to provide carbon neutral homes by 2026
		<i>Proposed changes: We should be starting NOW to impose improved standards of construction to give us more time to meet 2026 target.</i>
CSPO 051	Natural England	Paragraph 3.2.5 needs reinforcing
		<i>Proposed changes: new development will need to reflect the key features from Darlington's built 'environment and landscape setting' to help reinforce its distinctive sense of place.....</i>
CSPO 057	John Lavender, PlanArch Design Ltd (Lingfield Investments/Marchday)	Paragraph 3.2.4 may not be possible for Darlington to be a low carbon in the medium term because of the issue of viability across all sectors, in particular market and affordable housing, being a problem for delivery due to market volatility. In the North East, land and property values have reduced by 30% + over the last 12 – 16 months and may increase in the next financial year. Sustainable building standards up to 2016 will add costs to development and construction projects. Until market conditions improve over the longer term it will not be economically viable to insist on increasing costs associated with sustainable development standards.
		<i>Proposed Changes: suggest the opportunity to react to further market changes with the phrase 'medium to longer term' instead.</i>
CSPO 072	English Heritage	Section 3.2 Welcome the way the historic environment is dealt with. Paras 3.25 and 3.27 reinforce the importance of historic characterisation and of understanding context, whilst allowing contemporary interventions of appropriate high quality. Support the intention to make more prudent use of existing built fabric in line with RSS. Para 3.2.9 (2) should apply across the Borough to fit better with the first observation regarding design and a strategic approach to landscape and townscape.
CSPO 088	GOLD Members	There is a reluctance for planners to move out of their comfort zone. There are many buildings going up with no solar panels and with no underground water storage tanks to recycle water back into the building to use in toilets. This plan should still be efficient and cost effective in 20 years, not outdated and inefficient.
POLICY CS2 - Promoting Good Quality, Sustainable Design		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Term 'sustainable communities' questioned.
CSPO 001	Hummersknott Councillor	Amendment to (h)
		<i>Proposed changes: Provide vehicular... reflecting REQUIRED parking.</i>
CSPO 009	Eastbourne Event 121108	Seating is integral to the design of any new development that has an element of public open spaces for people to linger and talk
CSPO 009	Eastbourne Event 121108	Safety is a primary concern, specifically lighting, CCTV and access.

CSPO 012	Mr S Howarth	CS2 should be wider protecting setting and boundaries of historic villages
		<i>Proposed changes - Incorporate clauses covering rural areas, securing historic development boundaries etc...</i>
CSPO 027	CPRE, Darlington District Committee	Support CS2 but wish to see specific guidance covering the conversion to residential use of buildings, usually farm buildings, in the countryside.
		<i>Proposed changes - Define the criteria to be met if a building is to be converted to residential use, perhaps by use of a glossary. (Note Local Plan Policy E5).</i>
CSPO 031	One NorthEast	Welcome the importance placed on promoting good quality and sustainable design and the intention to require development to achieve these high standards of quality through attainment of Code for Sustainable
CSPO 037	Highways Agency	Support promotion of good quality sustainable design, particularly concentrating development in sustainable locations which helps to reduce the need to travel by car.
CSPO038	England & Lyle for Northumbrian Water Ltd.	Acknowledge criteria set out against which all new development will be considered, including a requirement for new development layouts to meet nationally recognised Code For Sustainable Homes and 'BREEAM' (non residential) ratings. Support the standards set out in criterion CS2(f) and the specific reference to incorporating infrastructure and services to serve the development in criterion CS2(i).
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Generally supported but concerned that stated timescales for introduction of Code of Sustainable Homes rating 6 by 2016 is likely to prove over-optimistic and is unlikely to be achieved. Has increased importance given the housing market seizure caused by ongoing financial crisis.
		<i>Proposed changes: Timescale should be extended to 2019 and wording of the policy amended to provide for flexibility through negotiation if necessary.</i>
CSPO 044	Environment Agency	Climate change and the reduction of greenhouse gases 'underpins' the vision and objectives. Strongly support this objective and recommend that it is incorporated in CS2.
		<i>Proposed changes: based on RSS Policy 34 and RSS Policy 39 and the climate change objectives in this plan, this element could be incorporated and potentially improved in CS2.</i>
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Support. The release of larger greenfield sites e.g. Great Burdon/Bishopton Lane provide an opportunity to develop housing and associated community facilities which will achieve the type of sustainable and inclusive design promoted.
CSPO 049	John Stoney	There is a danger of losing out on good quality, sustainable building and site layout design, if Darlington is looking to developers to pay large sums for affordable homes and infrastructure as well. Too many new housing developments, the Section 106 homes for affordable rent are built to far higher standards than the market sale homes whose mortgage payers cross-subsidise them.
CSPO 053	Government Office for the North East	Object to CS2 because it conflicts with PPS1 para 13 (v) which requires 'clear, comprehensive and inclusive access policies.' CS2 should refer to Circular 01/2006 for the need to provide design and access statements. It would benefit from editing to remove repetition to make the policy content clearer.

CSPO 057	John Lavender, PlanArch Design Ltd (Lingfield Investments/Marchday)	Suggest that CS2 should be altered to recognise that development proposals should aim to incorporate measures to reduce carbon emissions, on-going challenging market conditions may require a pragmatic application of objectives to ensure development delivery is not prejudiced.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Concern with (f). Should not duplicate matters covered in other legislation e.g (f) could come via policy or Building Regulations (Killian-Pretty review). Industry will meet the 2016 target through phased, measured changes to Building Regulations. Policy cannot dictate ways this would be met on particular sites. Government guidance allows builders flexibility to explore the most appropriate solution on a site by site basis. The 2016 target is challenging, requiring changes in industry practice and 'up skilling' in the supply and energy industries so that reliable supply of new, emerging technologies can be guaranteed. If the Code is to have value it must be consistent nationally and with RSS Policy 39. Industry cannot operate effectively when each LPA has an onerous and poorly justified policy. It can be counter-productive to achieving the target and to delivering housing. In the current market a pragmatic view for the development of brownfield sites is due for viability issues. Does not apply to the Beaumont Hill site where the Code will be reflected via integrated sustainability solutions (attached document).
		<i>Proposed changes: change the policy wording to state that developers should just demonstrate compliance with the current Code level.</i>
CSPO 063	Coilliers CRE for Lingfield Properties (Darlington) Ltd	Generally support, with amendments.
		<i>Proposed changes: should be amended to ensure the development is financially viable.</i>
CSPO 064	Barton Willmore for St Modwen Developments	Object to criteria C) and F) within CS2 and to the inclusion of specific details of other design guidance in the policy on the grounds of flexibility and deliverability. Details included within Secured By Design, Code for Sustainable Homes and BREEAM have the potential of being updated, amended or superseded, if the details of national policies change, the plan would not be 'sound' (PPS12, para 4.52). There is a requirement for developers to meet the identified sustainable construction and design standards but this is an issue 'controlled' through Building Control, in line with national policy, and not a policy matter.
		<i>Proposed changes: recommend that CS2 refers to the incorporation of sustainable development standards to meet government guidance. The Code for Sustainable Homes and the BREEAM standards could be referred to in the supporting text as guidance which would be helpful to developers.</i>
CSPO 065	DPP, for Tesco	CS2 requires future non residential development (2010-2016) to meet BREEAM 2008 standards 'very good to outstanding'. This is overly onerous for developers and should encourage developers to reach the highest standard possible but recognise the need for each scheme to be considered on merit. Failure to provide a deliverable, flexible policy may restrict growth due to the financial implications of achieving this standard. This may result in the document being found unsound.

CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	There is a potential requirement for Code level 4 (2010 - 2012) and Code level 6 (2014 - 2015). CS2 is inconsistent with the standards set out in Government's 'Greener Homes for the Future' which requires Code level 4 (2013+) and Code level 6 (2016+). Whilst PPS1 Supplement para 31 states local circumstances can advocate changes to these standards there is no evidence to show the timing departure from national standards or for the viability of introducing the proposed local standards (para 33, PPS1 Supplement). This is unsound.
		<i>Proposed changes: should be '(f) incorporate measures to reduce carbon emissions and adapt to climate change through the use of sustainable design and construction techniques in new developments so that their layouts meet the following minimum standards: a. Residential development From 2010: Code for Sustainable Homes rating 3; From 2013: Code for Sustainable Homes rating 4; From 2016: Code for Sustainable Homes rating 6'. For criterion (b) the use of the word 'reflect' in relation to Darlington's distinctive natural and built character is inappropriate and could have constraining implications on design. Should be '(b) have regard to Darlington's distinctive natural and built characteristics that contribute to the character of the local area and its sense of place'. Criterion (i) is ambiguous, clarity is needed in respect of the 'infrastructure' and 'services' required.</i>
CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Code for Sustainable Homes standards are not in accordance with the Government's timetable for all new homes to be built to zero carbon standards by 2016. There is no evidence demonstrating what local circumstances are considered to justify the departure from the national standards. This aspect of the policy is <u>considered unsound</u> .
		<i>Proposed changes - '(f) incorporate measures to reduce carbon emissions and adapt to climate change through the use of sustainable design and construction techniques in new developments so that their layouts meet the following minimum standards: a Residential development for 2010-2016 as: 2010-2012: Code for Sustainable Homes rating 3; 2013-2015: Code for Sustainable Homes rating 4; 2016: Code for Sustainable Homes rating 6...'</i>
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	The development of renewable energy must be carefully considered against local impact. Specific sustainability measures should be applied on a site-by-site basis for environmental impact and the scope for mitigation to ensure a fair and flexible approach to proposed development and its anticipated effect. Further detailed research needs to be undertaken to understand the impact of renewable energy alternatives and whether they offer genuine sustainable alternatives. Site-specific issues should be taken into account to ensure renewable energy is viable and does not undermine commercial viability.
		<i>Proposed changes: f) Incorporate appropriate and commercially viable measures to reduce carbon emissions and adapt to climate change through the use of sustainable design and construction techniques in new developments so that their layouts meet the following standards: b. non-residential development - DELETE REFERENCE TO ENVIRONMENTAL STANDARD.</i>
CSPO 070	National Council of Women of GB	Little consideration is being given to the look and style of future development and certainly young people need more consideration and provision of active space in the Town Centre. It should be 'alive' in the

CSPO 072	English Heritage	The historic environment remains invisible (b) should make reference to Darlington's 'distinctive natural, built and historic characteristics' as. Concerned with the use of the word 'reflect'.
		<i>Proposed changes: change the wording to 'Safeguard' allowing CS2 (g) to embrace support for high quality contemporary development which respects/complements the cultural heritage of the Borough in the same way that it should in respect of its natural heritage.</i>
CSPO 074	North East Assembly	Welcome reference to the implementation of construction techniques that meet the Code for Sustainable Homes and BREEAM ratings for all new development. CS2 is in conformity with RSS policies 2, 3, 7, 8, 24, 33, 38 and 54. CS2 should reflect RSS policy 38.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	(e) requires that all development proposals should be integrated within the existing network of key social and community facilities, promoting sustainable neighborhoods. CS2 does not define a key social and community facility (should include healthcare services and their provision) and is lacking from a Glossary. This omission of precision does not provide the required focus to deliver the plan's requirements.
		<i>Proposed changes: There should be a notation after 'key social and community facilities' and the term should be defined in the appropriate section as 'key facilities including all levels of healthcare provision'.</i>
3.3 Paying for Development Infrastructure		
CSPO 051	Natural England	Paragraph 3.3.1 The last sentence should be amended
		<i>Proposed changes: include reference to environmental infrastructure being provided as a result of the demands of new development.</i>
POLICY CS3 - Paying for Development Infrastructure		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	No reference to development tax
CSPO 016	The Theatres Trust	Support CS3 to show an overall approach to developer contributions. 10 needs clarifying as 'culture' is more than just public art, and presumably the intention is to reflect this.
CSPO023	England & Lyle (Ward Bros Steel Site)	Support approach, which seeks developer contributions to be negotiated on a site-by-site basis and by using a flexible approach. Given the size of the site, elements of open space and potential cycling and pedestrian links are likely to be incorporated into any residential scheme that comes forward. High remediation costs required to make the site suitable for residential uses must be considered where negotiating any contributions.
CSPO 024	England & Lyle (Green Street Motors Site)	Support approach, which seeks developer contributions to be negotiated on a site-by-site basis and by using a flexible approach. Given the size of the site, elements of open space and potential cycling and pedestrian links are likely to be incorporated into any residential scheme that comes forward. High remediation costs required to make the site suitable for residential uses must be considered where negotiating any contributions.

CSPO 025	England & Lyle (Cleveland St Site)	Support approach, which seeks developer contributions to be negotiated on a site-by-site basis and by using a flexible approach. Given the size of the site, elements of open space and potential cycling and pedestrian links are likely to be incorporated into any residential scheme that comes forward. High remediation costs required to make the site suitable for residential uses must be considered where negotiating any contributions.
CSPO 027	CPRE, Darlington District Committee	Support CS3
CSPO 031	One NorthEast	Welcomes the inclusion of the requirement for employment skills and training opportunities as part of the construction of major new development. Notes the requirement for all major developments to provide a minimum of 10% of energy from renewable sources which accords with Government objectives.
CSPO 037	Highways Agency	Support 5, in relation to sustainable transport and 11 which in relation to the strategic road and highway improvements.
CSPO038	England & Lyle for Northumbrian Water Ltd.	Acknowledge that CS3 sets out the parameters for seeking contributions and the range of matters for which contributions could be sought. CS3 makes no mention of utilities infrastructure. In relation to issue 8, request that water/drainage infrastructure be identified in the policy as one of the areas where contributions from developers will be sought. Request that Local Plan policy T52 is retained and refined to reflect the above comments.
		<i>Proposed changes: Reference to 'water and sewerage infrastructure' or 'utilities infrastructure' should be included.</i>
CSPO 039	Heighington & Coniscliffe Councillor	Concept of paying for development infrastructure is sensible but at times when development impacts on a community they should have the opportunity to propose the use of any monetary gain in their community.
		<i>Proposed changes - Local Communities will be consulted to look at the utilisation of any funding from a development that impacts on their community.</i>
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Generally acceptable. In order to ensure compliance with national policy advice, changes are necessary.
		<i>Proposed changes - 3 should be expanded: 'potential impact of the development upon the surrounding area and facilities, taking into account requirements arising specifically as a result of the particular proposal. With reference to standard charges and formulae, CS3 should make it clear that such changes will be contained within SPD's. Reference to major developments/possible need for planning obligations in respect of strategic infrastructure lacks clarity. Explain what term 'major developments' might include. A minimum dwelling capacity for residential developments would assist developers in understanding when such obligations may be required.</i>
CSPO 044	Environment Agency	Sustainable drainage measures should be incorporated into all developments where appropriate in line with RSS Policy 34.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Caution needs to be exercised in relation to the range of matters which may be subject to developer contributions. Accept that the wording of CS3 acknowledges that the level of developer contribution will be subject to the three matters covered in point 1-3.

		<i>Proposed changes - abnormal development costs have a significant effect on the economics of individual sites (and the level of contributions that can be sustained) and this should be acknowledged in the wording of the policy.</i>
CSPO 049	John Stoney	S106 funding should not be relied on for affordable homes as their market value may reduce the long term affordability trend, reducing the value of residential land and planning gain. Building costs will increase because of providing high levels of insulation and lifetime design standards. Family homes built at 35 units per ha should provide green space and the developer's contribution might be used for that. Affordable homes can be provided by releasing Council land to RSLs at an affordable price and building homes to rent, or identifying private land for affordable housing. Developers should fund a range of infrastructure but as development is proposed in different locations, it is unlikely that they could fund these aspirations. All 'major' developments to include provision of renewable energy for 10% of needs. The suitable area for wind farms is in north east Borough - will the developer have to fund the wind farm? Would be valuable if development uses 10% less energy than older homes. The best way to secure lower emission in the Tess Valley is with a nuclear station at Hartlepool, <u>protecting existing jobs and engineering capabilities.</u>
CSPO 051	Natural England	Should be extended to encompass the full remit of issues necessary to be addressed in dealing with development proposals, not only infrastructure. This should include securing necessary mitigation, compensation and subsequent management, monitoring and where necessary adjustment of these measures to ensure adverse effects on the environment are avoided, before, during and after development, and during subsequent use. This should not be confined to major developments.
		<i>Proposed changes: Amend 3rd para to 'the provision of site related community and environmental infrastructure....' amend 4) to read '... provision and enhancement of multi functional green infrastructure, open space, landscaping and children's play areas' And amend 9) to read '...enhancement including the strategic green infrastructure network.'</i>
CSPO 052	Durham Biodiversity Partnership	Support the recognition that biodiversity assets can provide important community infrastructure and the inclusion of improvements to these, including habitat creation, enhancement and management.
CSPO 053	Government Office for the North East	Object conflicts with PPS12 paras 4.8-4.12 which detail the requirements in relation to infrastructure provision that the core strategy has to satisfy. CS3 only deals with planning obligations and falls short of the infrastructure requirements in PPS12. Specific infrastructure requirements of strategic sites should be included (PPS12, para 4.11), which are not included. CS3 should refer to the Community Infrastructure Levy, the details of which should be available spring 2009.

CSPO 059	Sport England (North East)	Support as it includes strategic sport and recreation provision and enhancement. Number of concerns as to how CS3 might operate. The para preceding point 9 is heavily qualified so is unclear when it will operate. 'May' and 'where appropriate' are superfluous since clarification is not given as to when the planning obligations may not be sought and where the practice would be inappropriate. 'Major development' needs clarification as the GDPO states for residential developments this is 10 or more dwellings or sites of 0.5 ha or more. It has long been accepted by Inspectors that planning obligations for sport may be sought from all scale of development (i.e. a single dwelling). 'Strategic development' needs clarification. Sport England's definition of strategic sports facilities are regional or sub-regional scale sports facilities (Regional Facilities Strategy attached). The draft Community Infrastructure Levy permit Local Authorities placing a levy on development for such purposes, this may not be the intention or what is required in Darlington.
		<i>Proposed changes: suggest 'Planning obligations will be sought from major developments to contribute to the delivery of strategic infrastructure to enable the cumulative impacts of developments to be managed in a sustainable and effective manner'. Delete the 'strategic' but ensure that 9 is linked to the quantitative and qualitative standards for sports facility provision that are likely to be established through the PPG17 strategies.</i>
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Encouraged by the approach as there seems to be broad correlation with Circular 05/2005. Strongly suggest the five tests are included in the policy. Until the Community Infrastructure Levy comes in, it is essential that any developer contributions must pass the basic tests. The CIL will require the formulation of an Infrastructure Plan to analyse local requirement and its cost; to be tested on a sound evidence base. Only when a plan is in place could a fair developer contribution be formulated. In the meantime Circular 05/2005 must still take precedent.
CSPO 063	Colliers CRE for Lingfield Properties (Darlington) Ltd	Support but should be amended
		<i>Proposed changes: amend to take into account the need for the development to be financially viable.</i>
CSPO 064	Barton Willmore for St Modwen Developments	Object to the approach to securing developer contributions in CS3. Agree that a flexible approach to the assessment of the level of contributions to be sought from future development proposals is needed but concern that no information is provided in CS3 which identifies how the level of appropriate community infrastructure will be sought and calculated. Such methods should be subject to public consultation and should refer to negotiation with developers to identify any abnormal costs which may have an impact on the viability of development. To ensure transparency, information of local needs and the assessment methodology should be publicly available to ensure that developers can calculate the appropriate level of contribution. It should be clear that the level of contributions sought would make schemes unviable and jeopardise their delivery. A flexible system is needed to achieve the identified development targets, even in an uncertain economic climate. Infrastructure requirements should be determined on a site by site basis, in future potentially in a Community Infrastructure Levy which CS3 does not refer to.

		<i>Proposed changes: in order to be consistent with national guidance refer to the potential future use of the CIL and to how the identified framework will be delivered via other policy guidance (i.e. SPD's and public consultation). prepare SPD to identify how the Council will enter into early negotiations with developers in order to ensure that the level of contributions sought would not have a detrimental impact on the viability of development schemes.</i>
CSPO 065	DPP, for Tesco	Amendment needed.
		<i>Proposed changes: CS3 needs to make reference to the tests set out in Circular 5/05 (as previously identified in the representations for the Issues and Options).</i>
CSPO 066	Nathaniel Lichfield and Partners for Barratt Homes (North East) Ltd.	The 10% renewable energy provision should reflect RSS Policy 38, subject to feasibility and viability, having regard to the type of development and its design but is it necessary to refer to 10% renewable energy provision as it is implicit in the Code for Sustainable Homes level 3. Should make clear that improvements to biodiversity assets will only be sought where development would have an adverse impact on such assets. Items 9, 10 and 11 and any other infrastructure provision sought under this aspect of CS3 must be in accordance with the tests of Circular 05/05. Anticipating the Community Infrastructure Levy is inappropriate as the draft regulations are not due for consultation until Spring 2009.
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Requirement for developer contributions acknowledged. Consider the tests in CS3 should properly reflect the five criteria in Circular 05/2005. Should recognise para B10 that it may not be possible for a proposed development to meet all requirements and still be economically viable. In such cases, the level of contributions should be based on negotiation with developers. Seek clarity on how 'identified needs in that locality' will be established, either on a site by site basis or through a more strategic approach. Of the list of 11 potential infrastructure requirements to be considered, some of these may not be necessary for each development. Requirement of major new developments to secure 10% renewable energy provision should reflect RSS Policy 38 subject to feasibility and viability, having regard to the type of development involved and its design. CS3 anticipates CIL which is inappropriate given that the draft regulations are not due until Spring 2009.
		<i>Proposed changes: 'The level of developer contribution will be determined having regard to the following tests: 1) Is it relevant to planning, 2) Is it necessary to make the proposed development acceptable in planning terms, 3) It is directly related to the proposed development, 4) Is it fairly and reasonably related in scale and kind to the proposed development, and 5) Is it reasonable in all other respects. The appropriate range and level of contributions will be assessed in a comprehensive manner, taking into account the above criteria, development viability and where appropriate the use of standard charges and formula. ... Site related community infrastructure will be prioritised to reflect the identified needs in that locality to potentially include but will not be limited to: 1) affordable housing provision, 2) renewable energy provision for all major developments to provide a minimum of 10% of energy from decentralised and renewable or low carbon sources subject to feasibility and viability. These will potentially include but will not be limited</i>

CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Requirement for developer contributions acknowledged. Consider the tests in CS3 should properly reflect the five criteria in Circular 05/2005. Should recognise para B10 that it may not be possible for a proposed development to meet all requirements and still be economically viable. In such cases, the level of contributions should be based on negotiation with developers. Seek clarity on how 'identified needs in that locality' will be established, either on a site by site basis or through a more strategic approach. Of the list of 11 potential infrastructure requirements to be considered, some of these may not be necessary for each development. Requirement of major new developments to secure 10% renewable energy provision should reflect RSS Policy 38 subject to feasibility and viability, having regard to the type of development involved and its design. CS3 anticipates CIL which is inappropriate given that the draft regulations are not due until Spring 2009.
		<i>Proposed changes: '...The level of the developer contribution will be determined having regard to the following tests: 1) is it relevant to planning; 2) is it necessary to make the proposed development acceptable in planning terms; 3) is it directly related to the proposed development; 4) is it fairly and reasonably related in scale and kind to the proposed development; and 5) is it reasonable in all other respects. The appropriate range and level of contributions will be assessed in a comprehensive manner, taking into account the above criteria, development viability and, where appropriate, the use of standard charges and formula. Site related community infrastructure will be prioritised to reflect the identified needs in that locality to potentially include, but will not be limited to: 1. affordable housing provision 2. renewable energy provision for all major developments to provide a minimum of 10% of energy from decentralised and renewable or low carbon sources subject to feasibility and viability. These will potentially include, but will not be limited to'</i>
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	Should be negotiated on a site-by-site basis for a fair and flexible approach to development and its impact. The contribution must be proportionate to the nature and scale of the development, based on a reasonable and transparent assessment of the predicted impact particularly from major developments that contribute to strategic infrastructure and the cumulative impacts of development. Transport contributions should be clear and calculated on a site-by-site basis with respect to the impact on the strategic highway network. RSS minimum renewable energy requirements should be achieved via condition rather than planning obligations. Research is needed to assess the impact of renewable energy alternatives and whether they offer sustainable alternatives. Must be considered on a site-by-site basis to ensure viability which could be undermined, particularly in a challenging economic climate. The coordination and delivery of infrastructure in partnership, should be facilitated via cross-working and technical work in a time-efficient manner in advance of development to avoid delays.

		<i>Proposed changes: Where required as a consequence of development that cannot be secured by condition, planning obligations will be negotiated to secure necessary physical, social and environmental infrastructure. The contribution will be reasonable, fit for purpose and proportionate to the nature and scale of the proposal... The appropriate range & level of contributions will be assessed in a comprehensive and transparent manner, taking into account the above criteria, using standard charges/formula. DELETE 2 (secured by condition); 5. providing for accessibility to the development by a variety of modes of transport; 6. improvements to biodiversity assets affected including habitat creation, enhancement & management if required; 8. road & highway improvements as a result of the development. If major developments have the potential to impact on the wider infrastructure network, planning obligations may be sought, where appropriate, to contribute to the delivery of strategic infrastructure to enable the cumulative impacts of developments to be managed in a sustainably & effectively directly linked to the impact on the wider network</i>
CSPO 072	English Heritage	Where heritage assets might be affected by development, contributions should be sought to fund works to safeguard and/or repair them, putting the historic environment on the same footing as biodiversity.
CSPO 073	Alan Cave for The Miller Group	Support in principle but it is essential that each is assessed case by case, or in setting guidelines as to levels and nature of financial contributions, realism and reasonableness is applied since excessive requirements could prejudice the ability for a scheme of development to succeed. 3.3.7 is helpful in this respect.
		<i>Proposed changes: Add at end of CS3 'In determining appropriate levels of contribution from each scheme, the viability of development will be a material consideration, particularly in less buoyant market conditions.'</i>
CSPO 074	North East Assembly	Support the inclusion of CS3. The use of planning obligations to secure community and strategic infrastructure will assist in the implementation of RSS policies 2 and 24 in relation to achieving of sustainable communities.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	First para refers to physical, social and environmental infrastructure, whilst the third para refers to community infrastructure, to provide conformity the first para should include 'social'. A hospital trust under PPS12 constitutes one of the defined social infrastructure delivery agencies. Although not exhaustive healthcare provision should be included in the list of community infrastructure, as the effectiveness of its service delivery will be affected by development proposals.
		<i>Proposed changes: Add social to the first para and add a new point 3a. Provision and enhancement of healthcare facilities and services</i>
3.4 Promoting Renewable Energy Generation		
CSPO 027	CPRE, Darlington District Committee	The 'area of least restraint' has had the effect that there has been a rush of proposals in this area, which will inevitably have an unacceptable effect on residents in terms of visual impact and noise, as well as flicker and interference with electrical equipment. Very concerned about potential radar problems. The 'area' is close to DTVA. But do NOT just affect aircraft can affect people on the ground.

CSPO 034	East and West Newbiggin Parish Meeting	The 'Area of least restraint' has led to a rush of proposals for wind turbines which will blight the lives and have an unacceptable effect on residents. There are many examples of these unacceptable effects already arising from other local wind farms eg Walkway Wind farm at Sedgfield.
CSPO 035	Sadberge Parish Council	Figure 3.1: The 'area of least constraint' in is not consistent with the 'least impact' area specified in the Landscape Capacity Study which is a smaller area in the north-eastern part of the Borough.
CSPO 039	Heighington & Coniscliffe Councillor	Paragraph 3.4.9 'Presumption in favour of all renewable energy...' will open the floodgates. The recommended area for least constraint for wind farm development is to north east of Borough - shown on fig 7.2 as a SSSI. Evidence is being produced showing the inefficiencies of wind turbines, relaxing constraints for these developments could give us problems in future.
		<i>Proposed Changes: Any application to site renewable energy developments will be subject to local planning policies subject to the normal investigations related to all developments in countryside.</i>
CSPO 058	Banks Developments	Paragraphs 3.4.2 - 3.4.3 outline the national and regional aims for reducing carbon dioxide emissions, the Borough's renewable energy target is not provided. The RSS minimum target is 454MW and steps should be taken to exceed the target and work towards 20% of the region's electricity consumption being produced from renewable energy by 2020. As the plan will run for the 'next 15 years or so,' it should accommodate targets for 2020 and beyond, as the document will remain relevant past 2020.
		<i>Proposed changes: Specific targets for renewable energy should be set to identify the contribution Darlington can make towards the national and regional targets identified in paragraphs 3.4.2 and 3.4.3. The targets produced should be in terms of capacity in MW and percentages and should look to the longer term e.g.2020 and beyond</i>
CSPO 058	Banks Developments	Paragraph 3.4/Paragraph 3.4.4 Fig 3.1 A positive approach to the deployment of renewable energy is taken in accordance with the RSS. Although positive, the ideas presented in 3.4 remain unexplored fully. The Tees Plain and East Durham Limestone Wind Farm Development and Landscape Capacity Study is a well structured document and provides thorough information regarding the best locations for wind energy development, but it does not cover the whole Borough. The area of least constraint identified in Figure 3.1 is sound but wind farm development outside this boundary should not be precluded. Development outside this area should be considered on an individual basis, assessing a proposal on its own merits, regardless of the developments location outside the identified area of least constraint
		<i>Proposed changes: Further research is required to fully promote renewable energy generation in Darlington. At present there is not enough evidence to suggest the principle of promoting renewable energy generation/wind energy has been fully investigated across the whole district, either in a similar format to the Tees Plain report or in a SPD.</i>
CSPO 072	English Heritage	Paragraph 3.4.5 In general supportive of renewable energy generation, but should be more protection of the natural and built landscapes. Heritage assets and their settings (not just landscapes and townscapes) demand specific consideration which should be reflected explicitly in CS4 and the associated commentary.

CSPO 072	English Heritage	Paragraph 3.4.10 Was not consulted on the Darlington Climate Change Strategy and is unaware of its content or status.
CSPO 075	Delia Jack	Paragraph 3.4.4 the area of least constraint adjoins other areas which together are being considered for approx 33 wind turbines. The cumulative impact will have a significant, negative impact on the landscape and residents in the north east of the Borough. Any policy needs to reflect the possible impact of developments in surrounding districts. The plan acknowledges that wind energy is only part-time and can provide a partial answer. The acceptance of this conflicts with 7.1.2, 7.1.4, and 7.1.6 that 'the character and appearance of the rural areas should be safeguarded' (7.1.9). This implies that south of the borough is more worthy of preservation than in the north. But Bishopton is a conservation area, has listed buildings and an ancient monument, that need safeguarding in order to maintain the Borough's character (7.1.2).
POLICY CS4 - Renewable Energy		
CSPO Ref	Respondent	Comments
CSPO 002	Darlington Branch of Alzheimer Disease Society	Promoting more renewable energy generation and wind.
CSPO 011	Heighington Parish Council	CS4 too vague with reference to appropriate locations.
CSPO 027	CPRE, Darlington District Committee	Concerned that practically all proposals for renewable energy generation in the Darlington and County Durham area are for wind farms. Owing to the height they are having a considerable and unacceptable impact on the landscape. Benefits must be properly balanced against disbenefits, claims by developers must be weighed against reality based on the experience of existing wind farms in the area. Support the views of <u>Seven Parishes Against Turbines</u> with whom share concerns regarding wind farms.
		<i>Proposed changes - Take into account: potential effects of wind turbines on the landscape, minimum stand-off distances from homes and villages, maximum numbers in an area to deal with possible cumulative effect of adjacent wind farm proposals, noise/light/shadow flicker, effects on birds and wildlife, potential effects of wind turbines on airport radar</i>
CSPO 031	One NorthEast	Support CS4 which reflects Option 6C of the previous document. Note the inclusion of the requirement for a comprehensive assessment, where appropriate, of the impact of renewable energy schemes on the operation of air traffic and radar systems.
CSPO 033	Mr John and Mrs Valerie Whitby	Should not be allowed. Borough is too close to airports and only north to south runway for military aircraft in the country, the flight path for RAF Leeming runs across the Royal Oak area. Rebuttal proof of evidence provided for Kirkwhelpington, Northumberland.
CSPO 034	East and West Newbiggin Parish Meeting	Concern to residents. Note government policy regarding climate change, but are opposed to the development of inappropriately sited wind farms. The cumulative impact of such a large number of proposals for wind turbines in this region is highly inappropriate. There are concerns of the effect of radar returns for DTVA which is particularly close to the East Newbiggin site.

CSPO 035	Sadberge Parish Council	3.4 is superficial, vague and needs further work. In comparison other parts of the plan eg CS1 gives specific details of where development will be, CS10 gives details of how many houses will be built and where they will be. But CS4 is vague 'the development of commercial scale renewable energy schemes will be supported in appropriate locations'. Whether wind farms should be constructed in the Borough and if so, how many and where is important and needs a thorough analysis in a clearly defined policy. Commercial-scale wind turbines should not be located amongst the settlements in the NE part of the Borough. Recognise that Government targets, national and regional policies make it difficult to state that there will be no commercial-scale wind turbines in this location. A Suggested Wind Farms Policy (attached) suggests a specific, quantified planning policy for wind farms in the NE part of the Borough. This are compatible with national and regional policies and help mitigate the harm that would be caused if commercial-scale wind turbines are constructed in this location.
		<i>Proposed changes: Modify to adopt the Suggested Wind Farms Policy. CS4 should specify that: (a)Wind farm development will be restricted to the 'least impact' area specified in the 'Wind Farm Development and Landscape Capacity Studies: East Durham Limestone and Tees Plain' report for the North East Regional Assembly; (b)Planning consent will be given for a total of no more than 8 commercial-scale wind turbines in the north-eastern part of the Borough of Darlington; (c)Each wind farm will consist of no more than 4 wind turbines; (d)Each wind farm will be at least 1 kilometre from any dwelling, and at least 1.5 kilometres from any settlement comprising ten or more dwellings; (e)Wind farms will be separated by at least 5 kilometres.</i>
CSPO 046	Turley Associates for Durham Tees Valley Airport	Welcome reference to restriction of wind development close to DTVA. Support CS4 and para 3.4.5.
CSPO 051	Natural England	It is not clear why CS4 only relates to commercial development, when the supporting text mentions householder applications and micro generation. Small scale renewable energy should also be addressed. For commercial scale development a number of aspects are omitted from the criteria, CS4 should be
		<i>Proposed changes: 'Commercial scale renewable energy schemes will be subject to a comprehensive assessment detailing individual and cumulative impact upon:a) natural environment; national and locally important designated sites, protected species, BAP priority habitats and species : the historic environment b) local landscape & townscape character c) amenity of the community including visual amenity, air, dust, noise and/or odour, recreation & access facilities d) operation of air traffic & radar systems. Schemes will be supported in appropriate locations, where the assessment indicate no significant adverse impact on these criteria. Where significant adverse impact is identified, avoidance measures should be considered in the scheme, if non exist, mitigation and/or compensation measures should be incorporated.' As this last para may not make provision for refusal of unsuitable developments: 'Where significant adverse impact is identified, the scheme will only be permitted where these can be avoided, or acceptable mitigation and/or compensation measures, monitoring & review can be secured prior to development.'</i>

CSPO 052	Durham Biodiversity Partnership	Support the development of renewable energy to be carried out sensitively and not at the detriment of existing environment assets, considering the effects that these can have on habitats and species, but this should be reflected in CS4.
		<i>Proposed changes: The development of commercial scale renewable energy schemes will be supported in appropriate locations, subject to a comprehensive assessment detailing its individual and cumulative impact upon: a) the environment including biodiversity and natural or built sites of national and/or local importance; b) the local landscape and townscape; c) the amenity of the community including visual intrusion, air, dust, noise or odour; d) the operation of air traffic and radar systems. Where an adverse impact is identified appropriate mitigation measures will be required to be incorporated in to the scheme.</i>
CSPO 053	Government Office for the North East	Object to CS4 because it conflicts with PPS22 para 1(iv) and fails to give significant weight to the wider environmental and economic benefits of renewable energy projects.
CSPO 058	Banks Developments	CS4 is one of the shortest and is fairly vague. It generalises renewables, creating an imprecise structure to the policy. Biomass schemes don't have impacts on the operations of air traffic control and radar systems and wind farms don't create dust or odour.
		<i>Proposed changes: CS4 should define the 'comprehensive assessment' it states it will use to assess renewable schemes; including specific criteria and mitigation for the different types of renewable energy schemes, rather than a general list of impacts.</i>
CSPO 060	Great Stainton Parish Meeting	Great Stainton will potentially be impacted by the development of up to 30 wind turbines from Darlington and Sedgefield all within close proximity to the village. CS4 should in future safeguard communities against such threats.
		<i>Proposed changes: 1. The individual impact of each wind farm on the culture and landscape of the area to be considered. 2. The cumulative impact of clutter effect to be addressed by specifying a maximum of 8 turbines be erected in one specific area – regardless of county boundaries. 3. The minimum stand-off distance between any turbine and a property to be specified as 1 km and for a village 1.5km. 4. The effects of noise and light flicker on local residents to be give due consideration when determining the position of any turbine. 5. The minimum distance between separate wind farms to be set at 5km. 6. The maximum number of turbines in any wind farm to be restricted to 4 – 6 in line with the recommendations within the RSS. 7. Special treatment to be given to conservation areas such as Bishopton and Sadberge and to scheduled ancient monuments. 8. The effects on wildlife and birds and local footpaths and bridleways to be taken into account. 9. The significant and well publicised concerns over airport safety, to be considered.</i>

CSPO 069	B Kirtley	Object to West Newbiggin wind farm proposal: 1)Windmills were used in the Middle Ages but are out of fashion because they are unreliable 2) The modern day version is no better, they rely on critical wind speed to operate efficiently or at all, if the wind is too slow, no power is generated 3) Need a power station to be built to harness the energy generated 4) Power station has to be in permanent operation despite the wind turbines are in intermittent operation which wastes energy 5) Have a limited shelf life, they have to be replaced every 20 years which is not sensible economics 6)European neighbours are withdrawing from wind power because turbines are inefficient and not cost effective 7) Wind farms on arable land are scientifically and financially unjustifiable. There are alternative methods of generating electricity, but arable land is a prerequisite for food production. 8) there is the blight on the landscape and the devastating effect on those living in the area 9) the proposed end does not justify the means.
CSPO 074	North East Assembly	Consistent with RSS policies 2,24, 39, and 40. RSS policy 39 sets a regional target for renewable energy generation (10% by 2010 and 20% by 2020) and a sub-regional target for Tees Valley (138MW by 2010). Support reference to the inclusion of this target in CS4.
CSPO 075	Delia Jack	Concerned that the response to adverse impact is mitigation measures. Should be more forceful and acknowledge that the impact will be detrimental that the appropriate policy/action would be to oppose development. Mitigation would be insufficient at times. Where wind farms are considered, they should not be approved within 5 kilometres of villages and homes. There should be special regard for conservation areas and ancient monuments in relation to the siting of wind turbines. In view of the evidence about the low return from on shore wind turbines and the negative effects of wind turbines on wildlife and people's lives from noise, light flicker it would be appropriate to support renewable energy which has less impact on the landscape and its residents. A policy of resisting on shore wind farms in favour of off shore ones, combined with a policy focusing on renewable heat sources, not just electricity generation, and a more proactive policy towards recycling than exists would be more acceptable and contribute more to combatting climate change.
CSPO 078	Seven Parishes Action Group	Wording is extremely brief and lacks specific content for actual guidelines. Renewable energy and wind farms in particular, dramatically impact upon the lives of residents, especially in context of other policies in the Core Strategy but should be given equal weight and consideration. Recommend submission by Sadberge Parish Council as being a realistic way forward whilst at the same time protecting the human rights of many local residents. From discussions within senior Council planning officers, it appears that the Council does not have a structural policy to approach Wind Farm applications or to interpret the RSS on a local level in order to protect the environment and lives of affected residents.
		<i>Proposed changes - CS4 must be corrected in a detailed way by protecting the lives of residents in the area of 'least constraint'.</i>

CSPO 078	Seven Parishes Action Group	RSS states that the immediate area has the potential to accommodate medium small to small scale wind developments or approx 4-6 turbines leading to overall development of no more than 9 to 15 additional turbines to those already existing or consented. Consider level of cumulative development will completely blight the area and bears no resemblance to the guidelines outlined in RSS. Minimum stand off distances, as outlined in RSS to certain extent and also by Sadberge PC document should be used. CS4 must be expanded to give residents across Borough the confidence the cumulative impact of development will be minimised and that the Council will not be 'brow beaten' by developers. This Group represents over 2000 residents, implore that present day experiences are considered to avoid repetition in the future and their recommendations are adopted. This should eliminate the potential of cumulative clutter and overbearing visual and landscape impact for local residents. Consider the lives of residents when finalising CS4.
CSPO/080	Coatham Mundeville Parish Meeting	Support comments by Sadberge Parish Council (CSPO 035). Is a comprehensive assessment of the situation as far as the document refers to Sadberge.
4 PROSPEROUS DARLINGTON		
4.1 Supporting the Local Economy		
CSPO 013	Alan Cave for The Miller Group	Support but para 4.1.3 need clarification re references land areas at Faverdale and Heighington Lane as per RSS. It is assumed that reference to Heighington Lane, 125 ha reflects the site being predominantly in Sedgfield.
		<i>Proposed changes: Modify para 4.1.3 to read 'in addition to 125 ha in the key employment location of Faverdale (c120 ha) and Heighington Lane (C5 ha) which is predominantly in Sedgfield DC area'.</i>
CSPO/040	Sanderson Weatherall for Commercial Development Projects Ltd	Paragraph 4.0.1 to 4.1.8. Does not expand upon the location and characteristics in saved LP EP1, Does not correlate with RSS sequential approach to development.
		<i>Proposed changes: greater clarity should be given in relation to the Yarm Road area, and its status as a focus for the provision.</i>
CSPO 064	Barton Willmore for St Modwen Developments	Paragraph 4.0.1 states the time period of the plan as the next '15 years or so'. This conflicts with the Spatial Vision in Section 2, which states that the plan period is the next '20 years or so'.
		<i>Proposed changes: The figures need amending in order for the Core Strategy to be consistent within itself.</i>
CSPO 072	English Heritage	Paragraph 4.1.5 Environmental capacity is an issue for significant growth in any sector if the essential historic character of the town and surrounding villages is to be safeguarded.
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	Needs to be balance between residential on High Grange and West Park and the future employment uses suggested for EP2.7, EP2.8 and EP8.
CSPO 84/87	Youth Forum Area 3 Event	No support for low achievers given in schools
CSPO 84/87	Youth Forum Area 3 Event	Needs to be a more broad base of jobs not just relying on call centres or manufacturing

CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	Paragraph 4.1.1 RSS states that the health and social care sector plays a major role in the Tees Valley City Region economy, and with the Government's commitment to investment in the NHS and other healthcare projects, the provision and delivery of healthcare facilities is likely to be a major growth sector. Employment figures for the DMH and the Durham and Darlington NHS Foundation Trust are 2,200 and 5,000 respectively and the importance of the health sector should be reflected in the plan.
		<i>Proposed changes: After paragraph 4.1.1. add new para 'The health and social care sector plays a major role in the Tees Valley City Regions economy and with the Government's commitment to substantial investment in the NHS and other public healthcare projects, the provision and delivery of healthcare facilities is likely to be a major growth sector.'</i>
POLICY CS5 - Supporting the Local Economy		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	A map should be included
CSPO 009	Eastbourne Event 121108	Development should focus on smaller facilities such as those on Grange Road which would encourage people to come to the Borough from a wider sub region especially Teesside where these shops do not
CSPO 012	Mr S Howarth	125 ha of employment land is identified in Heighington Lane. This is a massive erosion of open countryside that has been under pressure from Sedgfield council for years. Presumably it brings development to the Heighington by-pass even closer affecting the rural and unique setting of Heighington Lane.
		<i>Proposed changes - Restrict development in Heighington Lane.</i>
CSPO 023	England & Lyle (Ward Bros Steel Site)	Support safeguarding viable employment uses in more sustainable locations. Albert Hill, where the Ward Bros (Steel) site is located no longer provides the most suitable or viable location for employment provision. The site is unlikely to be viable for redevelopment for entirely employment uses due to land values; there may be some opportunity for mixed uses including employment. Without an Employment Land Review it remains unclear of the stance towards existing employment land in the Albert Hill area.
		<i>Proposed changes: Request that the area is no longer safeguarded for employment uses.</i>
CSPO 024	England & Lyle (Green Street Motors Site)	Support safeguarding viable employment uses in more sustainable locations. Albert Hill, where the Green St Motors site is located no longer provides the most suitable or viable location for employment provision. The site is unlikely to be viable for redevelopment for entirely employment uses due to land values; there may be some opportunity for mixed uses including employment. Without an Employment Land Review it remains unclear of the stance towards existing employment land in the Albert Hill area.
		<i>Proposed changes: Request that the area is no longer safeguarded for employment uses.</i>
CSPO 025	England & Lyle (Cleveland St Site)	The site is no longer considered viable in relation to safeguarding employment.
CSPO 027	CPRE, Darlington District Committee	Support. Would be preferred if the Faverdale Reserve Site were to be deleted, but it is appreciated its inclusion in the RSS precludes this.

CSPO 031	One NorthEast	Welcome the recognition to develop all parts of the Borough's employment sector. Support intention to pursue a continuous and diverse supply of employment land across the Borough. Note the inclusion of Faverdale within the focus of employment land provision.
CSPO 032	Peter Wellings	Additional employment land in Heighington Lane should not be allowed to encroach on or compromise the integrity of Heighington village; the village boundary should not be eroded by development. The character and appearance of the countryside should be safeguarded.
CSPO 037	Highways Agency	Support. Concern with the specific location of development and the potential impact development could have on the operation of the SRN. At this stage the likely scale of development being proposed is not available but the potential impacts on the SRN will need assessing and may require mitigation. In discussions with the Council regarding specific proposals (e.g. Lingfield). It is assumed that there is an evidence base which considers the sustainability and accessibility of these locations and demonstrates that the development can be delivered (individually and cumulatively) without detrimentally impacting on the operation of the SRN. Where mitigation measures would be necessary for development to be deliverable, it is assumed they have been assessed to ensure provision of adequate mitigation can be delivered. Should this not be the case, would wish to be consulted.
CSPO038	England & Lyle for Northumbrian Water Ltd.	Future mixed use development of existing employment locations could significantly increase the type and quantity of demand for sewerage and water services that has been allowed for in the current employment allocations. Request early liaison to discuss proposed alternative uses for allocated employment sites and their implications for water and sewerage system capacities.
CSPO 039	Heighington & Coniscliffe Councillor	Only small plot of land in Heighington Lane within Darlington which has planning consent for the construction of warehouses. All Darlington land in Heighington Lane has been used.
		<i>Proposed changes: Acknowledge approved development in Heighington Lane but confirm that there is no further permitted development there.</i>
CSPO 040	Sanderson Weatherall for Commercial Development Projects Ltd	List excludes EP2.6 Yarm Road identified in the AMR as a location for future potential employment development. The Yarm Road area, specifically the former Torringtons works site, should have continued support for employment related/mixed use allocation. It is in a locationally advantageous position; is a brownfield regeneration site in the urban area, in close proximity to a fast and frequent public transport service. Regional and national policies provide a supportive policy structure for continuing to include this site (RSS policies 3, 4, 10, 13. PPG4, PPS4).
		<i>Proposed changes: Given the sites sustainability credentials and locational advantages, amend CS5 to include the Yarm Road area as a focus for the provision of 235ha of general and mixed-use employment across the borough to 2021, rather than being identified 'potentially' as 'other sites' in the text of the policy.</i>
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Support, welcome identification of Faverdale as key employment area within Borough.
CSPO 044	Environment Agency	Should any of these areas lie within Flood Zone 2 or 3, and are therefore at risk of fluvial flooding, should be subject to a Sequential Test

CSPO 045	GVA Grimley for Durham Constabulary	Support the provision of additional land for general and mixed-use employment at the Town Centre Fringe and Faverdale. Support the provision of an additional 125ha of employment land at Faverdale. Consider that the Faverdale site should be identified as suitable for mixed use employment and not solely employment uses (B1, B2, B8).
CSPO 046	Turley Associates for Durham Tees Valley Airport	Does not make explicit the amount of land available for employment development at the Airport. An area of 80ha for airport related uses is referred to in RSS Policy 21. This is a combination of land in Darlington and Stockton, CS5 should make clear how much of this is in Darlington. Relevant land areas within Darlington are 32ha of airport related (part of 80ha in RSS Policy 21) and 5ha of open employment land (RSS Policy
		<i>Proposed changes: Reference to RSS Employment Land provisions in Darlington (32ha for airport related employment and 5ha for general employment land) is made in CS5.</i>
CSPO 049	John Stoney	Darlington must work hard to attract new jobs. Several of the employment expansion areas are edge of town or out of town so must consider providing good bus links from residential areas directly to employment areas. Should be possible to run services that operate for factory/office opening/closing times; in between the buses can be used on different routes for school, shopping and hospital visits.
CSPO 053	Government Office for the North East	Object, conflicts with PPS12 para 4.1 (3) which requires the core strategy to set out how much development is intended to happen, where and when, and by what means. CS5 indicates sites but lacks other required detail. The evidence base will be strengthened once the Employment land review is completed and able to inform the distribution of employment land within Darlington.
CSPO 055	England & Lyle	Support identification of Town Centre Fringe as an appropriate location for mixed use development including housing. This area needs significant investment to improve the local environment and deliver its full potential. In the light of the Council's Employment Land Study and the BDP Darlington Gateway Strategy, there is no justification to retain the existing policy which gives priority to employment uses, especially with the declining supply of PDL for housing, although employment uses will still have a role.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Support the objective for economic renaissance and growth of the Borough and its contribution to the Tees Valley City Region. When reviewing employment land, specific regard should be made to PPS3 para 44 which stipulates that land unsuitable for employment can be appropriately re-allocated for housing. Having regard to this will also make a positive contribution to the rolling 5 year supply of deliverable sites for housing which is required by PPS3.
CSPO 063	Coilliers CRE for Lingfield Properties (Darlington) Ltd	Support as it provides for employment uses or for mixed uses, where appropriate. The identification of (e) Lingfield Area for mixed use development should include the 20 acre site owned by Lingfield Properties (Darlington) Ltd, located east of Lingfield Point.
		<i>Proposed changes: The area identified as (e) Lingfield Area should include the 20 acre site owned by Lingfield Properties (Darlington) Ltd, located east of Lingfield Point. This should be designated in the forthcoming Site Allocations Document and Proposals Map.</i>

CSPO 064	Barton Willmore for St Modwen Developments	Support the inclusion of Faverdale and the additional land identified on the Key Diagram for approx 120ha employment land, consistent with the RSS. Must clarify that the Feethams/Beaumont Street area is in the Town Centre. A further 69ha of employment land will be provided for up to 2026, but the RSS only runs to 2021, and does not provide employment provision figures up to 2026. The employment land review is still being undertaken and in the absence of national guidance, this additional requirement is unjustified and unsound. Note that 'existing viable employment sites will be protected' suggesting that unviable employment sites should be released for alternative forms of development. This should be included within
CSPO 065	DPP, for Tesco	RSS requires CS5 to be based on an employment land study. This is not available and will not be before the expiry of the consultation period. It is difficult to determine whether the Preferred Options are significantly robust or relevant without having the evidence on which they are based. Elsewhere, if this justification has not been provided the Core Strategy has been found unsound and withdrawn.
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	PPG4/Draft PPS4 require a continuous and diverse choice of sites to meet existing and future requirements to provide flexibility to attract investment and employment, especially in logistics. Economic development should be focused in sustainable locations in and adjacent to the urban area and in allocated edge of centre locations with low amenity value but suitable for development. Suitable sites, including existing allocations, should be safeguarded for employment (and mixed-used) uses. It should be clear that (e) Lingfield comprises the current allocation for employment and prestige employment and that these are brought
		<i>Proposed changes: (e) Lingfield area including the existing employment allocation</i>
CSPO 073	Alan Cave for The Miller Group	Support but needs clarification re reference to land areas at Faverdale and Heighington Lane as per RSS. It is assumed that reference to Heighington Lane, 125 ha reflects the site being predominantly in Sedgefield.
		<i>Proposed changes: Modify: 'A further 125 ha of employment land will be made available at the key employment locations of Faverdale (approximately 120 ha) and Heighington Lane (approximately 5 ha of which lying within Darlington Borough)'.</i>
CSPO 074	North East Assembly	Consistent with the employment land provisions in RSS policy 18. RSS policies 5, 12 and 18 place significant emphasis on the use of previously developed land and buildings. Unclear how the sequential approach in RSS policy 4 will be implemented.
		<i>Proposed changes: Would welcome reference to previously developed land and buildings, the phased approach to the release of employment land and the prioritisation of the use of PDL in CS5.</i>
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	CS5 does not define what constitutes an employment use. It needs a pre-amble explaining its rationale and its delivery.

		<i>Proposed changes: Proposed pre-amble: At the regional level there is recognition that Darlington plays an important role as a sub-regional employment, retail and cultural centre serving a distinct catchment area covering South Durham and a large part of North Yorkshire, stretching into the Richmondshire and Hambleton districts. The protection of existing valuable employment sites is also an integral part of the Council's preferred strategy provided that the sites are fit for purpose and such sites will be continually reviewed and areas will continue to be safeguarded for these uses through the site specific allocations and Development Plan Documents</i>
4.2 Expanding Tourism, Leisure and Culture Provision		
CSPO 011	Heighington Parish Council	Interest raised in strategic tourism site at Faverdale.
CSPO 017	Youth Forum Area 4 Event	A really distinctive attraction is required to persuade visitors to stop in Darlington; a museum would not be enough, a large sculpture like the angel of the north, perhaps a clock or a railway theme. Could the brick train be moved.
CSPO 051	Natural England	Paragraph 4.2.3 should recognise leisure and informal recreation opportunities, and the nature based tourism opportunities provided in the Borough, particularly in the urban fringe and countryside.
CSPO 072	English Heritage	Section 4.2 Tends to focus on high profile facilities but such attractions cannot exist in isolation from their townscape/landscape context. Rich cultural heritage can remain isolated in a broader historic environment where quality is diminishing or not maintained. A holistic approach is advocated (Power of Place, Government's response, A Force for our Future).
CSPO 84/87	Youth Forum Area 3 Event	Would like to see new cinema built in town centre, indoor sports centre/athletics track, ice rink, improved snooker hall, soccer courts like Stockton & Middlesbrough. Feethams could provide the land for new mixed use development
CSPO 84/87	Youth Forum Area 3 Event	Things should be cheaper
POLICY CS6 - Expanding Tourism, Leisure and Cultural Provision		
CSPO Ref	Respondent	Comments
CSPO 002	Darlington Branch of Alzheimer Disease Society	Future playing fields for Darlington very urgent.
CSPO 012	Mr S Howarth	Strategic tourism opportunity in vicinity of A68/A1M must not be the cattle mart development, Humbleton Farm. The scale is ludicrous with the auction market being a small part of the development. A tourist centre as a gateway on the east side of A68/A1M junction located off the 1st roundabout, linked to a rural setting may be a consideration, but would not be used, why not locate others and keep entry points to the town.

CSPO 016	The Theatres Trust	Pleased to see that Darlington's existing 'viable' facilities will be protected and enhanced. Support an increased range of tourist attractions, as cultural facilities can attract more visitors and boost the local economy. Request sufficient protection to ensure continued theatre use, particularly where buildings for performance arts may not be covered by listing or conservation area designations, or may be affected by <u>proposals for development</u> .
CSPO 027	CPRE, Darlington District Committee	Support, except for 'a strategic tourism opportunity is identified in the vicinity of the A68/A1(M) junction' which is vague and could refer to a small inconspicuous development or a vast, unsuitable one. Need clarity on its location, whether its a greenfield site, the type of development proposed. Too much is left open for interpretation.
		<i>Proposed changes: Explain what is meant by 'a strategic tourism opportunity identified in the vicinity of the A68/A1(M) junction' perhaps by use of a glossary.</i>
CSPO 027	CPRE, Darlington District Committee	Some uses which come under CS6 will need to be considered further to prevent unsuitable development e.g. horse related development, golf courses and holiday caravan, chalet and camping sites. The clear statements of the Local Plan reduced and prevented, unsuitable applications saving time and money. Also promote consistent and fair decision making.
		<i>Proposed changes: Give clear guidance on what would or would not be permitted for horse related development, golf courses, and holiday caravan, chalet and camping sites.</i>
CSPO 030	GC Bartram	Important to maintain the green areas between Darlington and the villages in the borough, any development in this area would be unnecessary extension of the urban area.
		<i>Proposed changes: remove 'a strategic tourism opportunity is identified in the vicinity of the A86/A1(M) junction'.</i>
CSPO 031	One NorthEast	Broadly welcome CS6, which is now considered to set out the important issues relating to tourism, leisure and culture. A strategic tourism opportunity on this site would need to follow the due process of
CSPO 032	Peter Wellings	New housing should be built as close to workplaces as possible.
CSPO 033	Mr John and Mrs Valerie Whitby	Too vague. Support except for second part, 3rd sentence A68/A1m. Prolific problem in area with gay community (ToyTop Picnic area was closed but still congregate at Swan House lay-by/Royal Oak lay-by and Brussleton Wood) from outside Darlington area.
		<i>Proposed changes: If this happens must be fenced and locked in the evenings. The suggestion would not enhance the area. Please remove.</i>
CSPO 037	Highways Agency	Without details regarding the use and scale of the proposal, consider that any proposed development in this location should demonstrate that it will not have any detrimental impact on the operation of the SRN. Early consultation is required, as and when specific details are available. The proposal must be accompanied by a Transport Assessment.
CSPO 039	Heighington & Coniscliffe Councillor	References made to Tees Valley as 'Rural City' and CS6 taking advantage of using green spaces, open countryside etc.

		<i>Proposed changes: The beauty of countryside and uniqueness of our villages will help attract tourists and businesses to Darlington. It is important to recognise this fact and ensure that we protect them for the future - hence the need for consultation with village residents etc before any small scale developments are permitted.</i>
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Support, particularly identification of A68/A1M interchange as location for strategic tourism opportunity.
CSPO 049	John Stoney	A vibrant Theatre and Arts Centre are vital features that set Darlington apart from other towns and attract visitors and employers. Integration of Community leisure and Cultural provision with School Buildings has become topical with the proposal to sell a large section of the Arts Centre to the QE Sixth Form College.
CSPO 053	Government Office for the North East	Object, conflicts with PPS1 para 27(i) which requires 'a positive planning framework for sustainable economic growth'. CS6 refers to the overall offer of the Tees Valley but is light on strategic detail. It identifies a strategic tourism opportunity at the A68/A1(M) but does not give any indication as to what it will be or if there is a partner identified to deliver it. Conflicts with PPS12 para 4.45 which requires evidence for
CSPO 059	Sport England (North East)	Welcome CS6 and commend Darlington for its recognition of • Leisure facilities being part of the town's quality offer; • Encouraging the use of school buildings and playing fields to meet local and community needs for leisure and cultural provision. But leaves the Council as a 'hostage to fortune' in terms of leisure facility provision as there is an implicit commitment to the retention of existing facilities. There can be problems with having too many sports facilities – revenue budget becomes thinly spread, and facilities are not maintained properly and their quality declines. Suggest that the focus of CS6 should be sharper once the Local Needs Assessment on built facilities is complete.
CSPO 072	English Heritage	CS6 is the preferred approach which states that advantage should be taken of the Borough's railway heritage and historic built environment is to be regarded in its holistic, inclusive, sense and not in association with railway heritage exclusively.
CSPO 074	North East Assembly	CS6 is in conformity with the principles of RSS policy 16.

5 A VIBRANT TOWN CENTRE AND ACCESSIBLE LOCAL SERVICES

5.1 Town Centre Development and Future Retail Provision

CSPO Ref	Respondent	Comments
CSPO 017	Youth Forum Area 4 Event	The town centre has a lot of good shops and facilities with good access, on foot or by public transport but some of the shops and services in the town centre need improving. Need facilities like at Teesside Park, as it has a good cinema, nice environment and is easy to access by car.
CSPO 028	Morrisons Morton Park Event	Darlington has lost its market town attractiveness, used to be a bustling town centre especially on market days. Town has lost vibrancy as market has declined but the indoor market should be retained and shouldn't be affected by development. Stalls should be in the market square area.

CSPO 028	Morrisons Morton Park Event	Concern about the retail mix in the town centre, too many charity shops and vacant premises and not enough of a unique offer to attract people to the town.
CSPO 028	Morrisons, Morton Park Event	The changes in the town centre, such as the lack of kerbs and very flat topography, do not work well for buses, as the roads feel dangerous.
CSPO 042	Savills for Nottinghamshire County Council Pension Fund	Paragraph 5.1.2 states that the aim is to enhance the attractiveness of the town centre through the construction of a major retail and leisure scheme at Commercial Street in the northern part of the town centre. The proposed scheme has been granted planning permission but it is not likely to go ahead until 2012.
		<i>Proposed changes: In the meantime, opportunities must be provided in and around other retail locations in order to attract new retailers to the Borough. The Council should revise the Darlington Retail Study 2004 to reflect the present situation and allow for a more flexible approach for the reconfiguration of existing units.</i>
CSPO 083	Hummersknott School Council	A new bowling alley and cinema at Feethams needed to draw people into the town centre.
CSPO 84/87	Youth Forum Area 3 Event	Would use town centre if facilities improved with a new bowling alley and cinema to draw people into the town centre instead of going to Teesside Park
POLICY CS7 - The Town Centre		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Our attraction to visitors/businesses should be based on Darlington's positioning and not external programmes.
CSPO 016	The Theatres Trust	Support as will ensure there is a dynamic and healthy retail economy and that the town centre is the focus for a range of services. Development in the town centre could allow restaurants and cafes in open plan settings, which would enhance theatre/cinema use. Improvements should give an area a sense of local identity and pride, and would entertain and stimulate local residents and businesses. Audiences coming for evening entertainment would enliven the surrounding area and provide custom for local bars and
CSPO 018	Turley Associates for Sainsbury's Supermarket	Support the intention of CS7 that gives primacy to development in Darlington town centre. Unclear from the evidence base how the Commercial Street and Feethams/Beaumont Street areas have been identified as a possible retail expansion area, and question whether such proposals are justifiable in relation to PPS12.
CSPO 018	Turley Associates for Sainsbury's Supermarket	The town centre boundary should be re-drawn to incorporate the Sainsbury's supermarket site. Extension to the town centre to the south should be included in CS7 as an alternative option to extending the Town Centre western direction.
CSPO 027	CPRE, Darlington District Committee	Support
CSPO 037	Highways Agency	Support. Having previously assessed individual planning applications for the Feethams area, the development of the area may require consideration of its potential implications on the SRN. Early

CSPO038	England & Lyle for Northumbrian Water Ltd.	Generally support CS7. In taking forward the future development of the town centre, urge that there are potential benefits from re-directing surface water into the Skerne. These benefits should be realised at every opportunity during redevelopment.
CSPO 045	GVA Grimley for Durham Constabulary	Support the Town Centre Fringe status as a preferred location for development after the Town Centre itself.
CSPO 049	John Stoney	A marketing initiative is needed to get national clothing retail brands/other comparison retailers to look at available units in the Cornmill and Town Centre rather than waiting for The Oval. CS7 refers to the competition from Teesside Park and Metro Centre. Motorists may be illogical, but they will travel rather than pay for parking. Darlington will struggle to compete until this issue is recognised.
CSPO 053	Government Office for the North East	Object to CS7 as conflicts with PPS6 para 2.15 which requires a strategy for the network and hierarchy of centres and their role. CS7 goes some way to meeting this requirement but the hierarchy is unclear in relation to deficiencies CS7 would need to address and any capacity in existing centres to accommodate new development (PPS6 para 2.16). The weakness in CS7 is due to the lack of strong evidence as the Darlington Retail Study was not available.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	To assist in the regeneration and support of the Town, district and local shopping centres would strongly advocate increasing their catchment population areas by delivering more housing, in addition to improving the mix of uses in the centres including residential.
CSPO 064	Barton Willmore for St Modwen Developments	The sequential approach identified in CS7 for the location of future town centre uses in Darlington Town Centre complies with PPS6 and will ensure that the vitality and viability of Darlington town centre will be safeguarded. Object to the use of 'additional town centre uses' within the second para of CS7 as it is vague. CS7 could mean additional types of town centre uses to the town centre uses defined within PPS6 (whatever Darlington considers these to be), which could be contrary to national planning guidance. <i>Proposed changes: recommend the 'additional' be described in respect of CS7.</i>
CSPO 064	Barton Willmore for St Modwen Developments	Further information is required in relation to the Town Centre Fringe in order to establish its specific role in the locational strategy and to identify how future town centre development within this location would comply with the requirements of PPS6, which makes no reference to the appropriateness of 'Town Centre Fringes' for town centre uses. <i>Proposed changes: recommend the 'Town Centre Fringe' be described in respect of CS7.</i>
CSPO 065	DPP, for Tesco	Support the promotion of the vitality and viability of the town centre, but do not consider it necessary to specify the locality for further development outside of PPS6 requirements. This will ensure that the CS7 complies with national planning policy.
CSPO 072	English Heritage	Welcome CS7, in particular, the notion of a settlement hierarchy which focusses public and commercial administration in the historic town centre wherever possible. Support efforts to accommodate development in ways which respect the history, character, identity and sense of place of Darlington as an ancient market town.

CSPO 074	North East Assembly	Consistent with RSS policy 25, which seeks to ensure that the preferred location for the development of town centre uses.
POLICY CS8 - Further Retail Provision		
CSPO Ref	Respondent	Comments
CSPO 009	Eastbourne Event 121108	Development should focus on smaller facilities such as those on Grange Road which would encourage people to come to the Borough from a wider sub region especially Teesside where these shops do not
CSPO 018	Turley Associates for Sainsbury's Supermarket	Ensure that quantitative retail need is assessed in the context of Darlington's role as sub regional centre. In order to perform this function effectively retail policy should make provision for further retail development. The retail study is not published so CS8 seems presumptuous, and it appears that there is no robust evidence base.
CSPO 027	CPRE, Darlington District Committee	Support
CSPO 037	Highways Agency	Support.
CSPO 042	Savills for Nottinghamshire County Council Pension Fund	Should reflect the findings of an updated Retail Study and promote a wide range of goods in and at the edge of District Centres.
CSPO 045	GVA Grimley for Durham Constabulary	Acknowledge the modest amount of retail floorspace required in the Borough by 2016, and support this being accommodated on the edge of the town centre where it cannot be accommodated in the Town
CSPO 053	Government Office for the North East	Object to CS8 as conflicts with PPS6 para 2.15 which requires a strategy for the network and hierarchy of centres and their role. CS7 goes some way to meeting this requirement but the hierarchy is unclear in relation to deficiencies CS7 would need to address and any capacity in existing centres to accommodate new development (PPS6 para 2.16). The weakness in CS7 is due to the lack of strong evidence as the Darlington Retail Study was not available.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	To assist in the regeneration and support of the Town, district and local shopping centres would strongly advocate increasing their catchment population areas by delivering more housing, in addition to improving the mix of uses in the centres including residential.
CSPO 064	Barton Willmore for St Modwen Developments	For CS8 to be 'justified' it should be founded on a robust and credible evidence base (PPS12), which has not been presented to justify the approach identified. Clarity is required as to whether a PPS6 compliant needs assessment has been completed in advance of this plan. Future revisions will need to provide robust and credible evidence to justify that future requirements of comparison and convenience set out in CS8 are sound. It is impossible to conclude from the information provided that the requirements are accurate in relation to the quantitative and qualitative need for further retail provisions within the Borough.
CSPO 065	DPP, for Tesco	Evidence gathered should be as up-to-date as practical having regard to what may have changed since the evidence was collected (PPS12). The evidence base for CS8 is the Darlington Retail Study, 2004. The level of detail contained in CS8 is not appropriate given that the evidence base is substantially out of date. It is understood the study is being reviewed, it should have been available to support the consultation of the Core Strategy. It does not meet the requirements of PPS12.

CSPO 074	North East Assembly	To ensure consistency with RSS policy 25 the development of any additional retail floorspace must be located within the town centre and be commensurate with their scale and function.
5.2 Lower Order Centres and Accessible Local Services		
CSPO 017	Youth Forum Area 4 Event	There should be more shops at Mowden
CSPO 083	Hummersknott School Council	There needs to be a large shopping precinct at West Park, like at Cockerton, so that people do not go down West Auckland Road and into town causing congestion.
POLICY CS9 - District and Local Centres and Freestanding Local Facilities		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Question use of regional strategies and directives as basis of policies due to possible changes in government in the future and worsening financial position.
CSPO 027	CPRE, Darlington District Committee	Support CS9, in particular the protection and promotion of independent shops and services.
CSPO 037	Highways Agency	Support.
CSPO 039	Heighington & Coniscliffe Councillor	Agree but should look to see how they can aid/support businesses in rural areas. Central Government and most authorities acknowledge the importance and loss of facilities in rural areas but few try to help.
		<i>Proposed changes: DBC will investigate the reasons for rural businesses closing and through advice taken from Central Government, consultants and local consultation, implement policies to support rural businesses to thrive.</i>
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Supports, particularly the identification of West Park as one of six defined Local Centres forming part of Borough's retail hierarchy.
CSPO 042	Savills for Nottinghamshire County Council Pension Fund	Retail growth should be focused on areas with an existing retail function. No Frills DIY unit should be located in the North Road District Centre. It is a sustainable location, can make a positive contribution to the district centre and would increase the viability of the district centre. It would recognise that retail is one of the principal growth sectors in the local economy. Understand that a detailed map showing the boundaries of each District and Local Centre will be in the forthcoming DPD.
		<i>Proposed changes: Request that the forthcoming DPD includes the No Frills DIY unit site within the North Road District Centre boundary as it provide the retail offer at this location in conjunction with the Morrisons foodstore.</i>
CSPO 044	Environment Agency	Should any of these areas lie within Flood Zone 2 or 3, and are therefore at risk of fluvial flooding, should be subject to a Sequential Test
CSPO 049	John Stoney	Ready availability of fresh food links in with promoting healthy lifestyles. There is a gap in the directly accessible fresh food offer in Firth Moor and Skerne Park. Needs to be linked with teaching people to cook at school and as life long learning and enjoy healthy meals. The number of fast food outlets v fresh food shops in housing areas reflects the choices people prefer. If they preferred salads to parmesans food outlets would sell them.

CSPO 053	Government Office for the North East	Object to CS9 as conflicts with PPS6 para 2.15 which requires a strategy for the network and hierarchy of centres and their role. CS7 goes some way to meeting this requirement but the hierarchy is unclear in relation to deficiencies CS7 would need to address and any capacity in existing centres to accommodate new development (PPS6 para 2.16). The weakness in CS7 is due to the lack of strong evidence as the Darlington Retail Study was not available. Title of CS9 'Freestanding Local Facilities' is unclear, is it referring to essential village services?
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	To assist in the regeneration and support of the Town, district and local shopping centres would strongly advocate increasing their catchment population areas by delivering more housing, in addition to improving the mix of uses in the centres including residential.
CSPO 063	Coilliers CRE for Lingfield Properties (Darlington) Ltd	The need for a local centre on or to the South of the Eastern Transport Corridor to serve the Urban Periphery East should be recognised and added to C.
CSPO 064	Barton Willmore for St Modwen Developments	There is no distinction in respect of the 'Town Centre Fringe' in the hierarchy of centres. If the 'Town Centre Fringe' is included as the next preferred location for town centre uses after the town centre (CS7), CS9 should include 'Town Centre Fringe' as second in the hierarchy. If, this cannot be supported then no reference should be made to the Town Centre Fringe to accommodate such development. CS1, CS7 and CS9 should be consistent.
CSPO 065	DPP, for Tesco	Support the designation of West Park as a centre, but it is more appropriate for it to be a district rather than local centre. The supporting text acknowledges that West Park is an area of significant housing growth and the centre is mid-way through its development. New centres should be planned which are of an appropriate scale in areas of significant growth or where there are deficiencies in the existing network of centres (PPS6). North-west Darlington is deficient in retail provision with a small number of retail units providing top up facilities and no facility for main food shopping. West Park as a local centre will not meet the existing deficiency in retail provision. It is only mid-way through its development, with further residential development coming forward. The requirement to provide facilities of an appropriate scale to meet the current deficiency and fulfil the future demand will only be met with West Park as a district centre.
CSPO 074	North East Assembly	Consistent with the principles of RSS policy 25.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	Is exclusively focussed upon retail provision and does not mention the provision of healthcare facilities. These can be freestanding to meet local requirements and may not be located within the defined hierarchy. To ensure that the soundness test on flexibility is met a reference to healthcare facilities should be incorporated stating that these may not necessarily fall within the defined hierarchy or the town centre in CS7. <u>This is supported in One Darlington: Perfectly Placed.</u>
		<i>Proposed changes: Insert para in the CS9: Freestanding local facilities include healthcare services which to meet local requirements may be in accessible locations but do not necessarily fall within the above hierarchy or sited within the town centre as set out in CS7.</i>
6 QUALITY HOUSING FOR ALL		
6.1 New Housing		

CSPO Ref	Respondent	Comments
CSPO 010	Alan Cave for The Miller Group	The higher level of housing completions for the Plan period, to reflect the TVHGP is supported, together with the need to provide higher proportions of larger family dwellings. Paragraph 6.1.13 it is essential to avoid land shortage to achieve the higher housing requirement and the SHLAA should avoid excessive prescription or over optimism re future supply of PDL.
		<i>Proposed changes: Amend para 6.1.3: The SHLAA will seek to sure a continuous supply of housing land and maximising the re-use of PDL as far as possible. The SHLAA will additionally seek to ensure the continuing vitality and viability of village communities. Amend CS10 'Set out in CS1 and CS2'.</i>
CSPO 017	Youth Forum Area 4 Event	Would choose to live in other areas for a new start, better opportunities, cheaper houses, better weather, jobs and university.
CSPO023	England & Lyle (Ward Bros Steel Site)	The Ward Bros (Steel) site covers 6.57ha, is a brownfield site, close to the town centre. The intention is to relocate the existing operation and develop the site as residential development to accommodate approx 300 dwellings of mixed type.
CSPO 024	England & Lyle (Green Street Motors Site)	Land at Albert Hill (Green Street Motors) is 1.2ha, a brownfield site close to the town centre which could accommodate 36 dwellings of a mixed type.
CSPO 029	Bellway Homes Ltd	The proposed step change in housing numbers is welcomed and supported.
CSPO038	England & Lyle for Northumbrian Water Ltd.	Support references in paras 6.1.9 and 6.1.12 for the need for adequate infrastructure to be in place to support new housing. Early liaison is required to discuss the location, quantity and phasing of new housing and their implications for water and sewerage system capacities.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Paragraph 6.1.6 Consider that an average density of 35dph should not be regarded as a negative outcome (if this is what is being inferred). Higher densities are appropriate on town centre/high accessibility sites, but are not normally as appropriate in other locations.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Paragraph 6.1.13 Agree that a target for the % of new housing to be built on PDL should not be set until the SHLAA is completed. Caution should be used as the supply of brownfield sites is finite and the development of sustainable brownfield sites should not be stymied in an attempt to achieve this target which may longer be achievable.
CSPO 053	Government Office for the North East	Object, conflicts with PPS12 para 4.46 which states that 'Plans should be able to show how they will handle contingencies'. Does not provide any alternative strategies to deal with changing circumstances and what would trigger their use. This is particularly relevant to housing delivery, with reference to PPS3 paras 62 - 67, which require the preparation of a housing implementation strategy to manage the delivery of housing and previously-developed land targets and trajectories.
CSPO 064	Barton Willmore for St Modwen Developments	The housing growth strategy should run to 2028, a period of 15 years, in line with PPS12.

CSPO 064	Barton Willmore for St Modwen Developments	Further clarification is sought as to how 160 for 2011-2016 has been reached. Based on a 20% uplift in Darlington's Growth Point status, it should be 408 (340 plus 68). Where figures differ from the RSS, it should be very clear why they differ and what justification there is to increase the figures.
CSPO 064	Barton Willmore for St Modwen Developments	Section 6.1 The housing figures in the RSS are not a ceiling. The Growth Points states that in the Tees Valley, a 20% uplift in RSS housing figures to 2016 is needed to achieve accelerated and additional housing sites. Table 3.1 appears to set a cap at 500 dwellings per annum. This is unjustified and does not accord with the 'Growth Point' guidelines/Council aspirations. It is unclear why 25 fewer dwellings are proposed for 2010 - 2011. Para 6.1.2 is founded on local housing market evidence, but the Guidance for Housing Market Assessments does not allow housing market assessments to override RSS requirements and the SHMA has not been completed.
CSPO 064	Barton Willmore for St Modwen Developments	Paragraph 6.1.5 Support paragraph 6.1.5 as it is consistent with national and regional guidance.
CSPO 064	Barton Willmore for St Modwen Developments	Paragraph 6.1.6 RSS Policy 29 identifies 30-50 dwellings per hectare and states that criteria should be set at the local level where lower densities are appropriate, to provide a better mix of dwelling types. Higher densities may not be able to provide sufficient family housing for the Borough. Criteria should be defined in CS10.
CSPO 072	English Heritage	Para 6.1.9 Welcome recognition of the importance of the existing housing stock, consistent with RSS. Continuing development of former rail and industrial land must safeguard and incorporate heritage assets to ensure local distinctiveness and sense of place. Support the intention to give priority to, the reuse and conversion of suitable buildings to meet PDL targets. Should consider using traditional (historic) buildings, many of which are capable of structurally and aesthetically withstanding contemporary interventions to either accommodate new uses or new forms of residential use.
CSPO 076	England & Lyle for Mrs Hartley (Land at Burtree Lane)	Should recognise the potential that exists to deliver future levels of housing in other locations which are well related to the town's existing settlement limits.
CSPO 077	England & Lyle for Mr Metcalfe (The Paddock)	Should include guidance on the amounts of housing to be concentrated in the urban area and the rural settlements to allow local rural housing needs to be met on the basis of a clear and sustainable locational strategy.
CSPO 077	England & Lyle for Mr Metcalfe (The Paddock)	With its facilities Bishopton should be a 'service village'. There are no opportunities for new housing in the settlement limits to maintain existing services (PPS7). The limits should be extended to ensure future residential development can be realised. The proposed site is available, suitable for housing and is capable of sustainably delivering a small amount of housing to help meet local needs (PPS3 & PPS7).
POLICY CS10 - New Housing Provision		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Question use of regional strategies and directives as basis of policies due to possible changes in government in the future and worsening financial position.

CSPO 008	P Jenkinson	More housing on brownfield sites and other areas proposed in this town should include a good stock of bungalows as the town appears to be short of these.
CSPO 011	Heighington Parish Council	Concerned that all Brownfield land would be outside development limits and possibly in the open countryside or villages.
CSPO 012	Mr S Howarth	Careful consideration must be given to the pressure on the boundaries of historic villages and Greenfield development, particularly with regard to affordable housing. Develop a robust policy to ensure protection of historic villages and historic buildings continues, Core strategy does not go far enough.
CSPO 023	England & Lyle (Ward Bros Steel Site)	The Ward Bros Steel Site would make a significant contribution to the housing requirements of the borough and sub- region and would help achieve the increased level of housing required by Growth Point Status. The delivery of housing should not be focused on the strategic mixed-use sites, which are inadequate and would not meet the required net annual completions. Support sequential approach to development considering the merits of each site (RSS policy 4). Support the target of 75% of all new developments to be built on PDL; there is a defined lack of available and suitable PDL in the urban area which this site would address. The site is within 300m of North Road Local Centre, CS10 encourages higher densities around district and local centres. Support the aspirations for an average density of 30-40 dwellings per hectare. A higher density could be achieved on this site.
CSPO 025	England & Lyle (Cleveland St Site)	Cleveland Street site is PDL and represents one of the largest sustainable Brownfield sites within the urban area. Proposed development of the site would make a significant contribution to the housing requirements of the borough and wider sub- region.
CSPO 024	England & Lyle (Green Street Motors Site)	The Green Street Motors site would make a significant contribution to the housing requirements of the borough and sub- region and would help achieve the increased level of housing required by Growth Point Status. The delivery of housing should not be focused on the strategic mixed-use sites, which are inadequate and would not meet the required net annual completions. Support sequential approach to development considering the merits of each site (RSS policy 4). Support the target of 75% of all new developments to be built on PDL; there is a defined lack of available and suitable PDL in the urban area which this site would address.
CSPO 027	CPRE, Darlington District Committee	Support but concern that the density of a housing development should have regard to the locality. There are places e.g. West End, where high densities would be out of keeping with the area. Any density figure must be an average across the Borough and not an amount to be achieved on every site.
		<i>Proposed changes: Note is made of where higher densities will be encouraged. Pro-actively mentioning that there are places where low densities would be appropriate to fit in with the surrounding area deserves mentioning e.g the West End of Darlington.</i>

CSPO 029	Bellway Homes Ltd	The locational strategy for housing is logical for the town centre areas and Central Park. Concerned at the reference at (d) to Lingfield area and the Key diagram suggesting development should be directed eastwards. This would potentially be into Grade 2 agricultural land. The key diagram shows Tees Forest/Community Woodland, which would be an inappropriate amenity use of a significant natural resource. Given the growth of Central Park and the town centre areas, a range and choice of housing should include land to the south of the town within the bypass and linked to the regenerative potential of the football stadium. This area is well related to facilities, good communications and has the potential to link into the local rail network and is a highly sustainable location.
		<i>Proposed changes: limit the Lingfield area to avoid taking high quality agricultural land and add a strategic mixed use to the south of the town (e) Snipe Lane.</i>
CSPO 032	Peter Wellings	Why are larger houses required when there are increasing numbers of single parent families? On what basis is it assumed that more people will come to work in Darlington and increase the need for more housing? Affordable housing should be built in appropriate locations. Umbrella of affordable housing should not be used as a pretext for destroying/damaging the historic fabric of the villages by the expansion of their boundaries.
CSPO 038	England & Lyle for Northumbrian Water Ltd.	The planned growth over the plan period to 2021 is a significant increase and at first assessment would exceed the planned capacity of the STW.
CSPO 037	Highways Agency	Housing should be located in sustainable and accessible locations, in urban areas on PDL, where there is safe and convenient access to a variety of services and sustainable transport. Support locating higher density development in locations with good public transport and at transport interchanges. Concern with the location of development and the potential impact it could have on the operation of the SRN. At this stage the likely scale of development proposed is not available but the potential impacts on the SRN will need assessing and may require mitigation. In discussions with the Council regarding specific proposals (e.g. Lingfield). It is assumed that there is an evidence base which considers the sustainability and accessibility of these locations and demonstrates that the development can be delivered (individually and cumulatively) without detrimentally impacting on the operation of the SRN. Where mitigation is necessary for development to be deliverable, it is assumed they have been assessed to ensure provision of adequate mitigation can be delivered. Further assessment will be provided during consultation on the Allocations DPD
CSPO 039	Heighington & Coniscliffe Councillor	Relate to Taylor Report
		<i>Proposed changes: Recommendation 13 states - The Government's Planning Policies should require LPAs to work with local communities to consider how the needs of every settlement or parish in their area can be addressed through the LDF...'. p100, para 60 'The support of the Parish Council should be a trigger for LA support of community', Recommendation 14 '... use proactive engagement with the local</i>

CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Support approach of allocating housing land to ensure delivery of new housing provision to accord with RSS and the Borough's contribution to Housing Growth Point. Requirements for net additions to housing stock between 2010 - 2026 are reasonable and (subject to required recovery from current market provision) are likely to be attainable. Taking into account relationship between residential and employment land uses and availability of good public transport linkages, identification of an additional strategic location at West Park would be sustainable and would ensure delivery of new housing. Would be consistent with locational priorities(CS1) and would support the major employment allocation at Faverdale (CS5).
		<i>Proposed changes: CS10 is incorrect referring to locational strategy in CS2, should be CS1. Amend accordingly. Refer to an additional strategic location at West Park. Key diagram should identify the area to the west of the mixed use development at West Park.</i>
CSPO 044	Environment Agency	Strongly recommend that no housing allocations are put forward in Flood Zone 2 and 3 which are at risk of flooding, due to the vulnerability of this residential use (PPS25). This will assist in the wider sustainability objectives in CS2. The allocations in CS10 should be subject to a Sequential Test informed by the Strategic Flood Risk Assessment.
CSPO 045	GVA Grimley for Durham Constabulary	Support the intention to direct mixed use development to the Town Centre Fringe and the priority being given to locating new housing on PDL in this area. Support the development of higher density dwellings at the Town Centre Fringe.
CSPO 050	Low Coniscliffe & Merrybent Parish Council	When allocating new housing, the availability of local schools, transport and sewerage systems should be considered. The new Merrybent Drive development has been built, but because of the lack of suitable local schools, children have to be bussed to various parts of the town. An improved dialogue with local parish Councils at the early planning stage could help alleviate such problems.
CSPO 053	Government Office for the North East	Object, conflicts with PPS12 para 4.1 (3) which requires the plan to set out how much development is intended to happen, where and when, and by what means. CS10 should indicate how much housing development is to be located in the 4 sites listed, which are difficult to relate to the strategic locations in CS1. It should be able to show that there is a 5 year supply of deliverable sites (PPS3) and have the evidence base to support it (SHLAA). This key piece of evidence will not be available until 2009 and was not able to inform CS10.
CSPO 055	England & Lyle	Weir Street site would contribute towards growth point status and would provide a deliverable option in the short to long term to embrace the projected uplift in momentum for housing building created by housing growth point status.
CSPO 055	Landowner at Weir Street, Darlington	Support the identification of the Town Centre Fringe as an appropriate location for housing development. The site is PDL, in a sustainable location with easy access by a variety of transport to shops and services. Note the comments in the BDP report acknowledging the success of recent residential development in the Weir Street area.

CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Strongly support continued housing growth in Darlington to meet current needs and aspirations but to facilitate a wider choice of housing for existing and new residents in the town. Flexibility should be 'built in' to the CS10 to not prejudice any large fully 'deliverable' allocations brought forward as part of the SHLAA. Until the SHLAA is complete, it is difficult to say whether or not there is a 5-year supply of available, suitable and achievable sites, to achieve the RSS net additions requirements. The large Beaumont Hill site is in accordance with PPS3, is deliverable now, given that its owners have commenced detailed planning proposals. It should be added as a strategic site. Reiterate that RSS housing targets are not ceilings, so the current housing targets can be exceeded whether the growth bid is successful.
CSPO 062	Big Tree Planning Ltd	Amend policy reference.
		<i>Proposed changes: Para 2 of CS10 refers to CS2, this should be replaced with CS1 as CS2 discusses design.</i>
CSPO 063	Coilliers CRE for Lingfield Properties	Support
CSPO 064	Barton Willmore for St Modwen Developments	Unclear where 350 dwellings per annum for 2016 - 2021 has come from, RSS states it should be 265 dwelling per annum and Table 3.1 of the Core Strategy repeats this figure. Growth Point uplift of 20% does not seem to be the source of the change. CS10 and the cap on housing provision at 500 dwellings per annum to 2016 is objected to and is unsound. A 20% uplift on 525 dwellings per annum between 2010 - 2011 should be implemented. Must be made clear how phasing will be determined, if it is through the Site Allocations DPD this should be clarified in CS10 or supporting text. Whessoe Road site should be included as a 'strategic site', it is a large PDL site in the urban area, with the ability to deliver approx 250 dwellings over two years and is 'deliverable' (PPS3, para 54).
CSPO 064	Barton Willmore for St Modwen Developments	CS10 refers to the 'locational strategy and priorities set out in Policy CS2'. This should be CS1 as CS2 deals with Design.
		<i>Proposed changes: include the Whessoe Road site as a Strategic site for new housing in accordance with PPS12, paras 4.6 and 4.7.</i>
CSPO 066	Nathaniel Lichfield and Partners for Barratt Homes (North East) Ltd.	Welcome the flexibility in the net additional dwelling figures in CS10. CS10 should reflect RSS allocations as a minimum, the Core Strategy targets and Growth Point uplift should not be limited to 500 dwellings per annum on the basis of past output (exceeded 500 dwellings in the last three consecutive years suggesting a higher capacity is achievable). Local housing provision should be determined having regard to evidence of current and future levels of need and demand for housing, including affordable housing (PPS3).

CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Approach is supported, particularly the flexibility provided by the housing requirement for 2010 - 2026 of 6,750 net new dwellings which has the potential to maximise positive and social impacts. The RSS recognises (para 3.89) that a case can be made for higher figures so annual allocations should not be limited to past output (exceeded 500 dwellings in the last three consecutive years, so a higher output is achievable). In current market conditions housing outputs will require adjustment, particularly in the later plan period, to accommodate any shortfall which may occur in the early plan period. CS10 must be 'founded on a robust and credible evidence base' and the SHLAA will be integral to this. Reserve the right to make further reps when the SHLAA is available. To ensure housing provision can be achieved, 'periphery north east' site should be added (masterplan enclosed). Adopting the national indicative minimum of 30 dwellings per ha, land at Skerningham has the potential to deliver approx 1,500 dwellings.
		<i>Proposed changes: 'New housing will be allocated in accordance with the locational strategy and priorities set out in CS1, including the following strategic mixed use development locations: (a) Feethams/Beaumont Street area (b) Town Centre Fringe (c) Central Park (d) Lingfield Area (e) Periphery North East.... Delivery will be focused initially on the locations (a) to (d) (e) in the priority order identified above...'</i>
CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Approach is supported, particularly the flexibility provided by the housing requirement for 2010 - 2026 of 6,750 net new dwellings which has the potential to maximise positive and social impacts. The RSS recognises (para 3.89) that a case can be made for higher figures so annual allocations should not be limited to past output (exceeded 500 dwellings in the last three consecutive years, so a higher output is achievable). In current market conditions housing outputs will require adjustment, particularly in the later plan period, to accommodate any shortfall which may occur in the early plan period. CS10 must be 'founded on a robust and credible evidence base' and the SHLAA will be integral to this. Reserve the right to make further reps when the SHLAA is available. To ensure housing provision can be achieved, 'periphery north east' site should be added (masterplan enclosed). Adopting the national indicative minimum of 30 dwellings per ha, land at Skerningham has the potential to deliver approx 1,500 dwellings.
		<i>Proposed changes: 'New housing will be allocated in accordance with the locational strategy and priorities set out in CS1, including the following strategic mixed use development locations: (a) Feethams/Beaumont Street area (b) Town Centre Fringe (c) Central Park (d) Lingfield Area (e) Periphery North East.... Delivery will be focused initially on the locations (a) to (d) (e) in the priority order identified above...'</i>
CSPO 072	English Heritage	To cement this approach include the test in the wording of CS10.
CSPO 074	North East Assembly	Average net additions to the dwelling stock are consistent with the net dwelling provision in RSS policy 28 (housing distribution differences attached). Priority will be given to locating housing on PDL to meet the sub-regional PDL target in RSS policy 29. The release of allocated housing will be phased so it is proposed that schemes will be built on an average density of 30-40 dwellings per hectare, consistent with RSS policies 2, 4,6,10, 28 and 29.

CSPO 076	England & Lyle for Mrs Hartley (Land at Burtree Lane)	Burtree Lane site would contribute towards growth point status, providing a deliverable option in the short to long term to embrace the projected uplift in momentum for housing building created by housing growth point status.
6.2 Housing For All		
CSPO 001	Hummersknott Councillor	Question in relation to affordable housing, subsidies, socio-economic effects, development tax
CSPO 015	Darlington Association of Parish Councils	Concern about developments in back gardens, linked to flood risk, protection of green space and conservation areas.
CSPO 019	Darlington Cycling Campaign	Little evidence in relation to integrating this issue with climate change. Does not aspire to targets for greener housing, or prioritise the upgrading of existing stock towards 'affordable energy bills' - key to any 'affordable housing' strategy?
CSPO 019	Darlington Cycling Campaign	No reference to reducing demands for car parking spaces and increasing demands for cycle parking.
CSPO 051	Natural England	Paragraph 6.2.6 (6.2.4- 6.2.7 should read 7.2.4 -7.2.7) states that the CS15 should be consistent with the ROWIP. This is not referred to in CS15, as ROWIP is not directly related to Biodiversity and Geodiversity, but is a key aspect of green infrastructure. Reference should be made in Section 8 and CS17.
CSPO 062	Big Tree Planning Ltd (Hunters Green site, St Margarets Close site, Middleton St George)	Paragraphs 6.2.1-6.2.6 The sites are capable of providing larger family homes or any other housing types that are identified to be in need and can contribute to the provision of affordable housing and older person housing. Both sites can support a mix of market and affordable housing types, to reflect the size and tenure of housing in need. These sites should be considered as rural exception sites for affordable housing. Affordable housing on both sites can be designed to lifetime homes standard.
CSPO 066	Nathaniel Lichfield and Partners for Barratt Homes (North East) Ltd.	Paragraph 6.2.4/para 6.2.5 welcome the recognition of the role of the private rented sector and the increasing role for intermediate tenure housing in meeting some of the identified affordable housing needs.
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Paragraph 6.2.4/para 6.2.5 welcome the recognition of the role of the private rented sector and the increasing role for intermediate tenure housing in meeting some of the identified affordable housing needs. The affordable housing shortfall for Darlington of 632 units should be considered in light of the increasing role of the private rented sector.
CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Paragraph 6.2.4/para 6.2.5 welcome the recognition of the role of the private rented sector and the increasing role for intermediate tenure housing in meeting some of the identified affordable housing needs. The affordable housing shortfall for Darlington of 632 units should be considered in light of the increasing role of the private rented sector.
CSPO 088	GOLD Members	There should be better planned sheltered housing of a decent size with a communal lounge so people can meet and socialise. It is important for people to communicate as it is not possible to go out, because of disability and health problems. People with wheelchairs can still do a great deal for themselves if the accommodation is designed and planned well.
POLICY CS11 - New Housing for All		

CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	What is Accommodation Growth DPD, where are such sites?
CSPO 009	Eastbourne Event 121108	No more apartments are wanted or needed in Darlington
CSPO 011	Heighington Parish Council	Refer to Matthew Taylor MP report for need for LA's to talk to Parish Council's to identify sites for affordable housing rather than just responding to developers proposed sites.
CSPO 023	England & Lyle (Ward Bros Steel Site)	Support that provision should be negotiated with developers based on up to date evidence of housing needs and provision.
CSPO 024	England & Lyle (Green Street Motors Site)	Support that provision should be negotiated with developers based on up to date evidence of housing needs and provision.
CSPO 025	England & Lyle (Cleveland St Site)	Support that provision should be negotiated with developers based on up to date evidence of housing needs and provision.
CSPO 027	CPRE, Darlington District Committee	Support CS11.
CSPO 031	One NorthEast	Welcome CS11 requirement to provide an appropriate mix of housing to meet identified shortfalls of dwelling types, sizes and tenures within the Borough.
CSPO 037	Highways Agency	Generally supportive of providing range of housing choice, helps to reduce need to travel.
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	CS11 is reasonable, and approach of seeking to negotiate affordable housing provision on a site by site basis welcomed.
CSPO 045	GVA Grimley for Durham Constabulary	Object - affordable and special needs housing required as part of any new development should be subject to viability testing to ensure that the requirements to provide these forms of housing do not prevent new residential development from being delivered.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Agree with approach. Exact level of affordable housing which is desirable/achievable should be looked at on a site by site basis in the light of how appropriate/needed it is in the ward and in the viability of provision.
CSPO 049	John Stoney	It is likely that the Banks & Building Societies requirement for at least a 10% deposit will be with us for some time so a target of 55 units of affordable housing per year 2010-2012 out of 500 per year seems a modest proportion.
CSPO 053	Government Office for the North East	Object, conflicts with PPS3 para 27 which states that a mix of housing on large strategic sites should reflect the proportions of households that require market or affordable housing. There needs to be more specific targets based on a strong evidence base. It fails to deliver the requirements of PPS3 paras 27 - 29 particularly an overall affordable housing target and an assessment of economic viability of housing land. The supporting text goes further than CS11 as it refers to the findings of the draft SHMA and an affordable housing shortfall of 632 dwellings pa for the next 5 years but these are not reflected in CS11.

CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Strongly agree that affordable housing provision will be negotiated with developers on the basis of up to date evidence, but CS11 needs to be more thorough and flexible in the delivery of affordable housing by looking at the housing need in the area at the time, in addition to whether public grant funding is available. If not, an alternative approach has to be considered. The Beaumont Hill site could viably accommodate 30% affordable housing, making a large contribution to the yearly targets. To make housing more affordable, there needs to be more housing built in total. An assessment of economic viability is required by PPS3 when formulating policies and any requirement should be justified with a 'sound' and robust evidence base.
CSPO 062	Big Tree Planning Ltd	Both Middleton St George sites can incorporate all of the required types, sizes and tenures of housing identified in CS11.
CSPO 064	Barton Willmore for St Modwen Developments	Object to approach to deliver an appropriate type and mix of housing to meet the current and future needs of the Borough. Support approach to negotiating dwelling types, sizes and tenures on up-to-date evidence of housing needs. When the level of affordable housing in CS11 (55 affordable dwellings/year 2010 - 2012) is assessed against the RSS (525 dwellings 2004-2011), 55 dwellings per annum equates to approx 10%. Seek clarification that 10% affordable housing is sought, a higher target has been set for Whessoe Road. RSS Policy 30 requires plans to be based on a robust and credible evidence base. 55 dwellings is based on the draft SHMA and Darlington Housing Strategy (265 units for next 5 years). The Affordable Housing SPD identifies 15%-40% affordable housing across the sub areas. Draft SHMA has not been published and the range of figures provided from different sources are inconsistent. The evidence base does not align with CS11.
CSPO 064	Barton Willmore for St Modwen Developments	No evidence has been provided for economic viability and practicability of the proposed affordable housing targets. A lack of viability testing is contrary to PPS3, recommend future revisions to the Core Strategy refer to the SHMA, to demonstrate that the affordable housing targets are deliverable. Economic viability was considered by the High Court (Blyth Valley Core Strategy). Found their affordable housing policy to be unsound as there was no consideration of viability evidence for the proposed 30% target.
CSPO 066	Nathaniel Lichfield and Partners for Barratt Homes (North East) Ltd.	For dwelling mix in developments of 15 dwellings (or 0.5ha) it would not always be appropriate to provide all four types specified in CS11 on every site. CS11 should make clear that provision would be negotiated on a site-by-site basis having regard to, but not requiring the inclusion of, all four types. Affordable housing shortfall for Darlington of 632 units identified in the SHMA should be considered given the increasing role of the PRS. Would welcome greater transparency in relation to the evidence base which has informed the 55 dwellings per year target for affordable housing. The economic viability of this target must have been tested with regard to land value. Evidence that such an assessment has been undertaken should be provided. This aspect of CS11 does not offer much guidance beyond 2012 which seems inadequate.
		<i>Proposed changes: Clarification of the proposed approach to affordable housing provision from 2012 onwards is required.</i>

CSPO/067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Greater transparency to the evidence base which has informed the 55 dwelling per year target for affordable housing is required. The economic viability of this target must have been tested with regard to calls on land value; evidence that such an assessment has been undertaken should be provided. Clarification of the approach to affordable housing provision from 2012 onwards is required. In relation to dwelling mix it would not be appropriate for CS11 to require the specified housing mix on every site within the Borough. CS11 should make clear that it would not be a requirement to provide the full mix on individual sites and that provision would be negotiated on a site-by-site basis.
		<i>Proposed changes: 'The mix to be considered on a site specific basis should include: • Affordable housing (to a target of xx dwellings per year) • Special needs housing and older persons accommodation • Larger family housing • Lifetime homes Provision will be negotiated with developers on the basis of up-to-date evidence of housing needs and aspirations, viability and site specific considerations'</i>
CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Greater transparency to the evidence base which has informed the 55 dwelling per year target for affordable housing is required. The economic viability of this target must have been tested with regard to calls on land value; evidence that such an assessment has been undertaken should be provided. Clarification of the approach to affordable housing provision from 2012 onwards is required. In relation to dwelling mix it would not be appropriate for CS11 to require the specified housing mix on every site within the Borough. CS11 should make clear that it would not be a requirement to provide the full mix on individual sites and that provision would be negotiated on a site-by-site basis.
		<i>Proposed changes: The mix to be considered on a site specific basis should include: Affordable housing (to a target of xx dwellings per year); Special needs housing and older persons accommodation; Larger family housing; Lifetime homes; Provision will be negotiated with developers on the basis of up-to-date evidence of housing needs and aspirations, viability and site specific considerations.</i>
CSPO 074	North East Assembly	Consistent with RSS policy 30.
6.3 Existing Housing Stock		
CSPO/072	English Heritage	Para 6.3.1 even with accelerated rates of housebuilding to meet government targets, the majority of the existing housing stock will need to serve a purpose beyond the plan period. Making best use is the most productive and sustainable means of reducing demand for new building materials, reducing energy consumption and reducing commercial waste.
CSPO/072	English Heritage	Paragraph 6.3.4 4 priority areas have historic importance which needs to be given due consideration. Development proposals must have due regard to context. They should be informed by an area characterisation and pay particular regard to scale and massing.

CSPO/072	English Heritage	Paragraph 6.3.6 The use of a sequential approach for housing interventions, starting with a presumption for the reuse of existing buildings before concluding that it is not appropriate, mirrors much of this section and should be included in CS12. Agree with respondents who call for improvements to the energy efficiency and energy conservation ratings of older properties, this should apply to all properties to minimise the need for the installation of potentially intrusive micro-renewable technologies.
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POLICY CS12 - The Existing Housing Stock

CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Which areas are to be demolished?
CSPO 027	CPRE, Darlington District Committee	Support but demolition should be a last resort. It should not be permitted when the advantage is it results in more profit than converting the building.
CSPO 031	One NorthEast	Welcome the intention to regenerate and improve the existing housing stock for areas where housing regeneration is proposed. It is important that CO ² emissions from domestic properties are recognised and opportunities to improve insulation and energy efficiency using innovative financial models to provide affordable warmth to vulnerable householders and to negate the impact of rising energy prices are adopted. New resources of up to £350 million are available through the Government's Community Energy Saving Programme.
CSPO 032	Peter Wellings	Conversion of existing non – domestic buildings for housing and improving the existing housing stock should be given high priority when the need for additional housing is assessed.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Provides basis for a pragmatic approach to dealing with housing regeneration. Demolition should be regarded as a last resort but may be needed in some areas where demand for the units will be weak even following refurbishment.
CSPO 049	John Stoney	Should include improvements to the standard of insulation of existing homes, in line with Government's drive to eliminate 'Fuel Poverty'. Owner occupiers could be treated the same as Social Housing renters and could give up a proportion of equity in the house in return for improvements carried out, especially modern insulation and heating systems.
CSPO 053	Government Office for the North East	Object, conflicts with PPS3 para 31 which requires positive policies to identify and bring into residential use empty housing and buildings in line with local housing/empty homes strategies. CS12 indicates two housing areas for regeneration and improvement but should make positive statements in relation to what will be achieved in these areas rather than list what the works may include. No need to refer to the Statement of Community Involvement in the policy as this is a statutory document.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Strongly support demolition and clearance of sub standard housing stock to assist regeneration rather than expensive remodelling of existing dwellings and failed estate layouts.
CSPO 074	North East Assembly	Consistent with RSS policies 2, 24, 29 and 30.

6.4 Accommodating Travelling Groups

POLICY CS13 - Accommodating Travelling Groups		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Also need to include a robust policy against travellers who do not comply.
CSPO 027	CPRE, Darlington District Committee	Concepts are supported, it leaves matters open, but the study which will inform CS13 is due shortly. CPRE would appreciate being informed of the results.
CSPO 033	Mr John and Mrs Valerie Whitby	Support but not in our area.
CSPO 037	Highways Agency	Recommend that any proposed sites are placed in locations that are accessible by sustainable means of transport and have good access to services to discourage the use of the private car.
CSPO 044	Environment Agency	Due to the highly vulnerable nature of gypsy and travelling sites as defined in PPS25, amendment needed to contribute to wider sustainability objectives set out in CS2.
		<i>Proposed changes: Add: '(d) are located in areas not at risk of flooding'</i>
CSPO 049	John Stoney	Should undertake detailed consultation with Travelling Groups to try to understand what they want. There is space on the edge of the Borough to make adequate provision, which could be distant from house dwellers. Many Travelling Groups appear not to be short of finance, so should provision be fully self-financing? If there were adequate provision of short stay sites, might be summer only to match the travelling season; there would be support for strict measures to deal with illegal camping and squatting.
CSPO 053	Government Office for the North East	Concerned as PPS3, para 21, requires a mix of housing with regard to 'the diverse range of requirements across the area, including the need to accommodate Gypsies and Travellers.' The text refers to Gypsies and other travelling groups but CS13 uses 'Travelling Groups', it should be clear that CS13 will provide for gypsies, travellers and travelling showpeople.
CSPO 072	English Heritage	Broadly support, advocate the use of the word 'acceptable' rather than 'significant' in CS (c)
7 DISTINCTIVE, GREENER, CLEANER, SAFER ENVIRONMENT		
7.1 Local Character and Distinctiveness		
CSPO Ref	Respondent	Comments
CSPO 013	Central Ward Partnership AGM	Need to replenish trees in the plan period as old ones will die off. Not just planting on new developments but we need to maintain a green Darlington.
CSPO 014	Youth Forum Area 1 Event	Dislike the Branksome school building, would like the appearance of Branksome Youth Club and School improved
CSPO 051	Natural England	Paragraph 7.0.2 Habitats and geology contribute directly to the Borough's distinctiveness and landscape, not only through rare and declining species.

CSPO 051	Natural England	Figure 7.1. shows 'Area of High Landscape Value', a local designation. PPS7(paras 24-25) looks for criteria based policies based on Landscape Character rather than local designations. Any need for additional protection based on local designations must be justified so the inclusion of AHLV should be reconsidered. The 4 'Landscape areas' (1-3b) should refer to the landscape character assessment and relate to the 3 Landscape Character Areas: Tees Lowlands, Durham Magnesian Limestone Plateau and Durham Coal Measures and related Natural Areas (see www.Magic.gov.uk).
CSPO 051	Natural England	Paragraph 7.1.5 It would be clearer if nature conservation issues were in a separate para to landscape and if the contribution of these assets to local character could be explained more clearly. This para should recognise habitat networks and links, Biodiversity Action Plan and Natural Area objectives for habitats and species, protected species as well as the designated/defined areas. Pleased to note the contribution to green infrastructure is recognised. Value of linked habitat networks in helping the natural environment adapt to the effects of climate change should be recognised.
POLICY CS14 - Local Character and Distinctiveness		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Baydale Beck needs to be included.
CSPO 009	Eastbourne Event 121108	Protection needed of key townscape views.
CSPO 012	Mr S Howarth	Nervous about the final document and its effect on rural villages, greenbelt development and general erosion of areas of high landscape and the countryside
CSPO 027	CPRE, Darlington District Committee	Support CS14
CSPO 035	Sadberge Parish Council	Support
CSPO 049	John Stoney	Admirably expressed to preserve our town and the rural area around it. Great part of the character of Darlington town centre is that the architecture is eclectic. Not all additions need be pastiche Victorian or Georgian. Buildings can be modern but still fit in with their neighbours.
CSPO 051	Natural England	Could be more appropriate to address 4e) and other biodiversity and geological conservation issues in CS15 to avoid duplication.
		<i>Proposed changes: 2) should seek to 'protect & enhance the appearance of including features of the distinct Landscape Character Areas; 4) should recognise the need for management to maintain the features described. Look for the distinctive assets to include locally relevant BAP habitats and species, delivery of Natural Area Targets and the integrity of habitat networks. Could indicate that the assets listed are integral to multi-functional green infrastructure.</i>
CSPO 053	Government Office for the North East	Concerned as PPS12, para 4.33 states that the plan should deal with issues of local importance. CS14 identifies local issues but 2(a) to 'the Tees Valley' is not helpful in terms of identifying issues of local importance. The Darlington Characterisation Study should inform CS14 and enable an increased local focus to be achieved.

CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Enhancement of the historic environment is supported but it is crucial that a pragmatic approach is taken to the protection and reuse of historic buildings and areas of landscape value in facilitating development and regeneration projects.
CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Support, but seek to amend section 2 to ensure CS14 does not constrain the strategy for growth, development and enhanced infrastructure in line with Darlington's sub-regional role. The delivery of the proposed Strategic Countryside Site at Skertingham/Barmpton Lane may result in changes to the character of the area.
		<i>Proposed changes: Preserving, where appropriate, the separate character and appearance of the villages and the countryside including the distinct landscape features of : a) the Tees Valley b) Magnesium limestone escarpment c) Farmlands of the central belt and the Skerne Valley and Ketton d) Landmarks in</i>
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Support, but seek to amend section 2 to ensure CS14 does not constrain the strategy for growth, development and enhanced infrastructure in line with Darlington's sub-regional role. The delivery of the proposed Strategic Countryside Site at Skertingham/Barmpton Lane may result in changes to the character of the area.
		<i>Proposed changes: '2) Preserving, where appropriate, the separate character and appearance of the villages and the countryside including the distinct landscape features of: a) the Tees Valley; b) Magnesium limestone escarpment; c) Farmlands of the central belt and the Skerne Valley and Ketton; d) Landmarks in the villages...'</i>
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	Consistent with the RSS, promoting high quality, prestige employment development in allocated gateway locations on the urban fringe will add prominence to the region and its appearance, developing the distinctive qualities of the Borough's built character whilst providing environmental improvements by reviving poor quality landscapes.
		<i>Proposed changes: The distinctive qualities of the Borough's built and natural townscapes and landscapes, as well as the approach to the city, will be protected and, where appropriate, enhanced to positively contribute to the character of the Borough to raise aspirations and promote a strong sense of place. AS EXISTING.</i>
CSPO 072	English Heritage	Support pro-active and constructive approach, advocated in RSS paras 7.0-7.1. Para 7.1.9 sets out the key issues from earlier consultation, one of which is that townscapes and landscapes should be protected, but not fossilised. Unfortunately it does not translate effectively into CS14. Unclear how RSS Policy 32 will be addressed so have concerns for the conformity of the Core Strategy with RSS.
CSPO 074	North East Assembly	Principles of CS14 are consistent with RSS policy 2, 24, 30, 31, and 32.
7.2 Biodiversity and Geodiversity		
CSPO Ref	Respondent	Comments
CSPO 051	Natural England	Changes required to para 7.2.1 and 7.2.3.

		<i>Proposed changes: Paragraph 7.2.1 Modify the second sentence to read 'maintaining and enhancing habitat networks to reversing habitat fragmentation and enable the natural environment to adapt to the effects of climate change' to relate to all designated, local sites, BAP and Natural Area features. Habitat networks should be considered strategically, along with habitat creation, and included as a key aspect of multifunctional green infrastructure. The final sentence should be 'the scarce and unique plant and invertebrate communities that are restricted to the magnesian limestone soils of the escarpment to the north of the Borough'. Paragraph 7.2.3, final sentence 'improved access to biodiversity sites' should be included as part of, rather than additional to, multi-functional green infrastructure, which should include sustainable drainage and flood management measures. The extent of green infrastructure and its development should relate to, and be embedded in, CS17.</i>
CSPO 079	Tees Valley Local Access Forum	Paragraph 7.2.3 Agree with the final sentence but it should emphasise the increased potential this may bring for creating new access opportunities within such spaces.
POLICY CS15 - Biodiversity and Geodiversity		
CSPO Ref	Respondent	Comments
CSPO 027	CPRE, Darlington District Committee	Support CS15
CSPO 044	Environment Agency	All development proposals should seek to protect, conserve and enhance biodiversity and geological networks and conform to the objectives and targets set out in the UK and Durham Biodiversity Action Plans. <i>Proposed changes: CS15 (5) should include the protection of watercourses and wetland habitat.</i>
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Pragmatic approach should be taken to protect and enhance biodiversity and geodiversity networks in order to facilitate development and regeneration projects.
CSPO 072	English Heritage	Apart from reference to the Stockton and Darlington railway trackbed (1b), archaeological sites (4c) and locally important historic features (5), the historic environment is effectively disregarded. The approach to biodiversity and geodiversity is set out clearly and unequivocally, but there is no corresponding clarity concerning the historic environment, with which there should be relative parity (PPS1). <i>Proposed changes: CS14(5) to be amended as: (5) Protecting and enhancing important buildings and key historic features including those of local importance and those identified in the Darlington Characterisation Study.</i>
CSPO 074	North East Assembly	Consistent with RSS policies 33 and 36.
7.3 Environmental Protection		
CSPO Ref	Respondent	Comments
CSPO 017	Youth Forum Area 4 Event	There should be more bins around streets and more streetlights in Mowden.
CSPO 84/87	Youth Forum Area 3 Event	There is too much clay in ponds, too many holes in fences and litter

POLICY CS16 - Environment Protection		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	a, b and c not acceptable without adequate protection being put in place simultaneously.
CSPO 005	Health & Safety Executive	Check the Consultation Zone library thorough PADHI +
CSPO 027	CPRE, Darlington District Committee	Support CS16
CSPO 038	England & Lyle for Northumbrian Water Ltd.	New development will not be permitted where the flood risk is unacceptably high or where it would increase the risk of flooding downstream'. NWL questions the mechanism behind how this would be adequately achieved if there is a third party downstream.
CSPO 038	England & Lyle for Northumbrian Water Ltd.	Although discussed in para 3.2.4 prior to policy CS2, there is no reference to SUDS or flooding from other sources in the main policy text of CS16 (or CS2).
		<i>Proposed changes: Refer to Sustainable Urban Drainage Systems and flooding from other sources in CS16 or an equivalent policy.</i>
CSPO 043	The Coal Authority	Support. Industrial activities in Darlington have left an environmental legacy which is a challenge and an opportunity. Ensure in coalfield areas, legacy of mining activities is considered at all stages of planning process (PPG14). Ensure the following issues are clearly identified: ground instability resulting in shallow coal working collapses, exposure of historical mine entries, emissions of mine gas/water and potentially spontaneous combustion of coal can be triggered by new development.
		<i>Proposed changes: Refer to PPG14 and PPS23 in an appropriate place in text.</i>
CSPO 044	Environment Agency	Does not address the risks of flooding (PPS25). Should reflect the requirement to steer all development away from areas at risk of flooding (Flood Zone 2 and 3) through the Sequential Test and Exceptions Test. Flood Risk Assessment will be required for all developments in Flood Zones 2 and 3 to demonstrate the risks of all forms of flooding to and from any proposed development and how these risks will be managed, taking climate change into account. Does not conform to PPS25 and does not adequately address the material consideration of flood risk in planning applications, which should not be overlooked to meet the regeneration aims of the Borough. By not addressing the risks of flooding to and from development, CS16 fails to meet the sustainable development principles of CS2. CS16 should be reworded to mitigate against unsafe, unhealthy and polluting development by ensuring that there are no adverse impacts to the Magnesian Limestone Aquifer, in accordance with PPS23.

		<i>Proposed changes: Reword: All development will be steered away from areas at risk of flooding (i.e. Flood Zone 2 and 3). Should any development proposals lie within Flood Zone 2 or 3, the following will be required to be submitted a) A Flood Risk Assessment to demonstrate all risks of flooding to and from the development and how these risks will be managed taking into account climate change; b) A Sequential Test (if this has not been previously undertaken by the local authority) to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed; and c) In appropriate cases as defined by PPS25, an Exception Test to demonstrate that the proposed development is necessary for wider sustainable development reasons.</i>
CSPO 053	Government Office for the North East	Object, conflicts with PPS12 para 2.1 which describes spatial planning as 'to coordinate and deliver the public sector components of this vision with other agencies and processes; create a positive framework for action on climate change'. CS16 does not refer to partnership working or provide a positive framework but concentrates on safeguarding and controlling. Amend to achieve a more positive and collaborative spatial approach.
CSPO 049	John Stoney	It is surprising that there are ANY exceptions to a policy where the flood risk is unacceptably high, or where it would create higher flood risk downstream, unless mitigation of guaranteed effectiveness can be put in
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Agree with the approach set out in PPS25 and associated practice guidance. Peased that the Core Strategy seems to be following this approach and is not placing any additional unnecessary burdens on developers in the design process.
CSPO 074	North East Assembly	Consistent with RSS policy 35. CS16 sets out criteria that seek to improve and protect the environment and its residents in Darlington. These include the reduction of air, land, water, light or noise pollution. This is consistent with RSS policies 2, 8 and 37.
8 HEALTHY DARLINGTON		
8.1 Green Infrastructure		
CSPO 002	Darlington Branch of Alzheimer Disease Society	More playing fields and playing areas for families/children.
CSPO 014	Youth Forum Area 1 Event	There are good parks in the area. It is nice and easy to get around the Cockerbeck, but West Park bike track should be available to all ages, all the time. There are no lights in the Denes.
CSPO 015	Darlington Association of Parish	Costs of maintaining open space, want to see partnership with the council.
CSPO 017	Youth Forum Area 4 Event	Darlington has more green spaces than other towns. These spaces are important for a pleasant environment and can provide privacy between homes. Some spaces should be developed on but parks, should be kept green unless the development improves leisure facilities in the park (e.g. Skerne Park). Trees are important to help combat climate change.

CSPO 017	Youth Forum Area 4 Event	South Park is nice but there is no park in Mowden. It should have a football pitch and bike tracks. There should be ice skating on the old football pitch. The Skerne Park MUGA should be free so it would to be used by young people.
CSPO 017	Youth Forum Area 4 Event	There should be projects around Stanhope Park area to keep young people occupied and off the street
CSPO 017	Youth Forum Area 4 Event	There should be more places to lock your bikes up.
CSPO 035	Sadberge Parish Council	Support.
CSPO 049	John Stoney	Joined-up thinking is essential to seek provision of easy access to health promotion/medical facilities in parts of town that, based on life expectancy data need them. 8.1.6 include 'maintain green spaces to stop anti-social behaviour' and 'sites for children and young people but close to homes'. Should group new homes around a 'Village Green'. Houses would be separated by a road so the green would then be a separate space, not developed and so not in the density calculation. Demands from residents for signs saying 'No Ball Games'/'No loitering by groups of young people' should be resisted. The purpose of well overlooked open space is to permit these activities of children and young people. Remind the oldies they were young once and where did they play?
CSPO 079	Tees Valley Local Access Forum	Section 8.1 Rights of Way are a pre-existing network, which form a key component of Green Infrastructure and act as an important recreational facility, which should be protected and enhanced. Should seek opportunities to provide better facilities for walkers, cyclists and horse-riders, by adding links and extending rights of way networks, providing added health benefits for the wider population.
CSPO 079	Tees Valley Local Access Forum	Paragraph 8.1.7 Should reflect the Rights of Way Improvement Plan in providing accessible routes that not only connect internally but look outward to connect with neighbouring networks which need to be made available for all users.
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	The Faverdale Black Path should be opened up to include a new road from Faverdale to Whessoe Road.
CSPO 083	Hummersknott School Council	At West Park there needs to be provision for children and young people.
CSPO 84/87	Youth Forum Area 3 Event	There should be more tennis courts
CSPO 84/87	Youth Forum Area 3 Event	There should be more street lights and flashing streetlights
CSPO 088	GOLD Members	The car park in Bells Place should be turned into a green area with more trees for people to rest and enjoy the Town Centre
CSPO 088	GOLD Members	Developers could be asked to contribute towards improving access for cycle ways
CSPO 089	Youth Forum Area 2 Event	There should be better places for young people to hang out and more activities for people who are different to not feel isolated. There should be more lights and bins in streets and in North Park. There should be more football fields.

CSPO 090	Eko Planning for County Durham and Darlington NHS Foundation Trust	Does not refer to the provision of healthcare facilities. The only reference to health (not healthy living) is the first sentence of para 8.0.1. This is a major omission as Darlington Memorial Hospital is a major healthcare facility for residents and the wider area, is a significant local employer and helps achieve sustainable communities. Support in this plan of healthcare development and modernisation would provide the Trust with confidence in achieving the agreed aims from Seizing the Future on the Clinical Services Strategy for the next 5 years. A reference to this would provide certainty for major infrastructure works at the Hospital and support healthcare provision to achieve the goals in One Darlington. Theme 5 Issues and Options identified the need to consult with the Trust on strategic health matters in the preparation of the Preferred Options. This has not happened despite the need in PPS12 (paras 4.27 – 4.30) to engage with key delivery stakeholders. To ensure that the Core Strategy is sound, robust and flexible, there should be a specific policy for healthcare facilities and the changing needs of health provision prior to CS17 with explanatory text
		<i>Proposed changes: After first sentence 'sets out how healthcare, sport and active recreation will change over the LDF period to set a framework to facilitate improvements to the Borough's health and well-being'. Before para 8.1'Heath Care Provision: Health and well-being are major issues and are closely interrelated. Health is about more than access to medical treatment and services it can be improved through delivering quality new, living and working environments. Encouraging lifestyle changes by providing access to sustainable transport and open spaces will promote cohesive and inclusive communities. Hospital sites and health centres contribute to this and the LDF will protect existing health facility sites to ensure that access to health is maximised. The potential requirement for new hospital development and health centres through reorganisation will be considered in DPDs. The Darlington Memorial Hospital is a key provider of healthcare facilities in the Borough. During the plan period there is the possibility that there may be expansion at the Darlington Memorial Hospital.</i>
		<i>CS17a: Health Care 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 other LDF policies. New and relocated health facilities should be in accessible locations where there is demonstrated need and should be linked to recognised centres where appropriate. Proposals involving the loss of healthcare facilities will be permitted only where adequate alternative provision is made to meet the needs of the community. The principal health facilities in Darlington are safeguarded for health provision with a presumption of continued expansion in their sites, accompanied by travel plans. In safeguarded areas, proposals for non-healthcare uses must demonstrate that the land is no longer required for health care. In Hospital Areasthe following uses will be preferred: Hospital and other residential institutions, research and development. Other acceptable uses: small-scale office developments, housing, community facilities, institutions and car parks. Development proposals for uses not listed would be decided on their own merits,i</i>

		<p>Post-Amble CS17a aims to establish an environment that enables residents of Darlington, surrounding towns and villages 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 to identify and address the potential impacts of the proposal, which will address contributions to healthcare facilities in CS3. CS17a aims to ensure that new facilities are provided in response to the growth of Darlington and the Borough and also changing demographic profiles. CS17a will be implemented by: oWorking 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.oThrough the consideration of planning applications.</p>
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POLICY CS17 - Green Infrastructure		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Must include Baydale Beck
CSPO 027	CPRE, Darlington District Committee	Support CS17
CSPO038	England & Lyle for Northumbrian Water Ltd.	Fails to recognise the importance of future water and sewerage operations. CS17 is too restrictive to achieving the potential expansion of the Treatment Works as may be necessitated by future development in the town – to ensure the implementation of CS1, CS5 and CS10.
		<i>Proposed changes: Request that Local Plan Policies T54 and T55 will remain in force or that CS17 reworded accordingly.</i>
CSPO 041	Peacock and Smith, for Bussey and Armstrong Ltd	Generally supported, amendment required.
		<i>Proposed changes: Amend the key diagram to delete the reference to the Tees Forest/Community Woodland as it currently applies to land to the west of West Park.</i>
CSPO 044	Environment Agency	Support.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Support. Consider open space network is a special characteristic of Darlington which should be protected and enhanced. Consider that development of the site at Great Burdon is an important opportunity to further enhance the network in a similar way to West Park.
CSPO 059	Sport England (North East)	Welcome the recognition that the health of Darlington is a spatial matter, important to making the Borough a sustainable community. Disappointed that this is in a green infrastructure policy. Main contribution to health is through physical activity (with incidental recreation at one end of the spectrum and formal sport at the other), suggest that CS17 ought to cover: <ul style="list-style-type: none"> • Design of new developments; • Opportunities for informal provision; • Accessibility of a range of quality sports facilities; • Direct inclusion of facilities via planning obligations; • Use of Health Impact Assessments in policy and development control.
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Support the extension of existing 'green networks' to provide linkages to potential housing sites to facilitate development

CSPO 067	Theakston Estates, c/o Nathaniel Lichfield & Partners	Criterion F) includes the Skertingham/Barmpton Lane strategic countryside site but understand that a definitive boundary has not been agreed. It falls, in part, in these land interests (conceptual masterplan enclosed to help define a boundary). For clarity, it is important that a plan to establish the boundaries of the network and those in criteria (A) - (G). This will ensure CS17 is effective, deliverable and able to be monitored. Additional flexibility is sought in respect of the loss of Green Infrastructure; given the plan is to be operational for 15 years.
		<i>Proposed changes: 'This network as defined on the Darlington green infrastructure plan [to be prepared] will include : The loss of any part of the green infrastructure network will only be considered in exceptional circumstances where: It has been demonstrated that the site no longer has any recreational, wildlife or amenity function; It is not required to meet a shortfall in the provision of another type of open space; It is required to meet development needs in accordance with the policies of this Core Strategy and an alternative equivalent or better space is available when assessed in terms of quality, quantity, accessibility, biodiversity, attractiveness and functionality is available.'</i>
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	Criterion F) includes the Skertingham/Barmpton Lane strategic countryside site but understand that a definitive boundary has not been agreed. It falls, in part, in these land interests (conceptual masterplan enclosed to help define a boundary). For clarity, it is important that a plan to establish the boundaries of the network and those in criteria (A) - (G). This will ensure CS17 is effective, deliverable and able to be monitored. Additional flexibility is sought in respect of the loss of Green Infrastructure; given the plan is to be operational for 15 years.
		<i>Proposed changes: 'This network as defined on the Darlington green infrastructure plan [to be prepared] will include: ...The loss of any part of the green infrastructure network will only be considered in exceptional circumstances where : • it has been demonstrated that the site no longer has any recreational, wildlife or amenity function; • it is not required to meet a shortfall in the provision of another type of open space; • it is required to meet development needs in accordance with the policies of this Core Strategy and an alternative equivalent or better space is available when assessed in terms of quality, quantity, accessibility, biodiversity, attractiveness and functionality is available...'</i>
CSPO 072	English Heritage	One of the purposes is to enhance the historic character of the Borough. Unfortunately, CS17 provides no indication of how the historic character will be enhanced. The accompanying commentary only provides reference to example of locally important open spaces.
CSPO 074	North East Assembly	Consistent with RSS policy 2, 8 and 24, which advocate the development of green infrastructure.
9 EFFICIENT AND EFFECTIVE TRANSPORT INFRASTRUCTURE		
9.1 Planning for More Sustainable Travel and Travel Choice		
CSPO Ref	Respondent	Comments

CSPO 006	John Dunn	Strategic response should be to replace the Arriva bus garage with a bus/train interchange – near the rail station to benefit Darlington with objective of increasing public transport use not to make provision for more car parking. Darlington needs a proper bus interchange and this should be within the life of this strategic
CSPO 011	Heighington Parish Council	There should be a bus station in Darlington.
CSPO 013	One NorthEast	Welcomes the intention to apply a number of measures, including improvements to public transport, to realise these policies supports the Sustainable Travel Town.
CSPO 014	Youth Forum Area 1 Event	Bus routes and cost of using the buses, the volume of traffic and improved cycle routes are all high priorities
CSPO 015	Darlington Association of Parish Councils	There is a long standing concern about monitoring emissions from planes from new airport developments as well as traffic on roads.
CSPO 019	Darlington Cycling Campaign	Transport vision needs to be underpinned by a desire to reduce congestion by reducing car use, re-allocate freed-up road space to cycling infrastructure, and make cycling a more convenient and pleasant way to make short trips across Darlington than by car. The aspirations are laudable but a clearer understanding of what will attract new users to cycling (women, young parents with children, the elderly) is required as opposed to the current dominant young/male profile of the Darlington cyclist. Development of convenient, quality cycling routes that attract citizens out of their cars when compared with parallel routes for motorised transport are important. Marketing will not attract people out of cars and on to bicycles if the routes are patchwork, indirect and shared with motor traffic.
CSPO 021	Mrs D E McGregor	Darlington needs a bus station, with facilities e.g. toilets, refreshments etc
CSPO 022	Royal Mail Group Property PLC c/o Sanderson Weatherall	Welcome some text stating that key consultees will be included in the consultation process when discussing traffic management schemes. Concerns regarding premises on Crown Street, if Crown Street is pedestrianised then this will have ramifications on access to the Post Office. Public transport schemes, pedestrianisation routes should not undermine the maneuverability of Royal Mail vehicles.
CSPO 028	Morrisons Morton Park Event	Would like a new bus station in place of the old one with a café, shops within it etc.
CSPO 028	Morrisons Morton Park Event	Problems with the buses in the town centre and the changes to the town centre to incorporate them, such as the lack of kerbs and very flat topography which makes the roads feel dangerous.
CSPO 046	Turley Associates for Durham Tees Valley Airport	Supports reference in para 9.0.1 to airport. Note reference in para 9.2.4 to new metro station at DTVA.
CSPO 046	Turley Associates for Durham Tees Valley Airport	Para 9.1.2 DTVA has role in achieving 'improving connectivity' but the CS19 does not support the expansion of DTVA. RSS provides for the expansion of the DTVA and is an important means of fulfilling RSS objectives. CS19 should adopt a consistent approach.
		<i>Proposed changes: Add to para 9.1.2: 'Continued expansion of DTVA is a key part of achieving the RSS objective of improving connectivity within and beyond the region. Expansion of the airport is therefore supported.'</i>

CSPO 071	Dorothy Lincoln	In the summary of the LDF (p7) there is no reference to a bus station. People have been asking for a bus station for years. Must consider long distance bus travellers, not only Arriva. Newspaper articles provided from local paper in relation to the bus station.
CSPO 84/87	Youth Forum Area 3 Event	Bus station should be developed in town centre, needed for central changing point. Bus fares should go down
POLICY CS18 - Sustainable Transport Networks		
CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Sustainable transport policy - without a bus terminal? Para 3.14 forecasts a population increase of 10% and an increasing ageing population. Housing policy identified need for approx 7000 houses by 2026. Environment policy demands reduction in CO2 which is supported by encouraging people to use buses. If successful, there will be more people using buses - how will the current situation cope when chaos reigns
		<i>Proposed changes: 'Council will support... all forms of transport with priority to...' and 'as part of Feethams development DBC will recommend the construction of a new bus terminus to satisfy the increased demands from public transport passengers'.</i>
CSPO 006	John Dunn	Reference made to 'Transport Hubs', especially around rail stations and should be prioritised for high quality interchange facilities
CSPO 027	CPRE, Darlington District Committee	Support CS18
CSPO 032	Peter Wellings	More direct bus route between Newton Aycliffe and Darlington town centre would encourage more usage. The current journey takes one hour by bus.
CSPO 033	Mr John and Mrs Valerie Whitby	Bus station for Darlington (Northern Echo article provided about bus station). More toilets, coffee bar in bus station. Not what Arriva want but what residents need. Please leave Arts Centre as it is! Will the town clock be removed next?
CSPO 035	Sadberge Parish Council	Amendment suggested
		<i>Proposed change: Modify so that the list of priorities for improvement of pedestrian, cycling and public transport networks includes safe, off-road links between neighbouring villages and between the villages and Darlington e.g. an off-road footpath/cycle path/bridleway to link Sadberge to the existing cycle path/bridleway between Middleton St. George and Darlington.</i>
CSPO 037	Highways Agency	Support many provisions of CS18, particularly to improving the provision of public transport and other sustainable modes of travel, which can help to reduce the need to travel particularly by private car. Welcome the implementation of school, workplace, residential and the Bank Top railway station travel plans, which can help to reduce travel by private car, and can help to alleviate congestion on the local and strategic networks. Consider that all major developments should be supported by Transport Assessments and Travel Plans. Would welcome reference to Circular 02/2007 and the GTA.

		<i>Proposed changes: Welcome reference to the Highways Agency in point (b), but considers that it should be re-worded as: '(b) working with the Highways Agency to ensure the safe and efficient operation of the Strategic Road Network is maintained.'</i>
CSPO 044	Environment Agency	Support.
CSPO 049	John Stoney	Darlington has a pretty good bus service, it runs into the evenings unlike some towns. There are good radial routes but should be circumferential routes to make it easier to reach places of work. There is need to integrate rail and bus systems so it is easy for passengers to get a bus to Richmond/Barnard Castle. Arriva should be required to start routes from the Railway Station, a corner of the Cattle Market car park could be used and then just pick up in the town. Some in-town circular routes from the Rail Station to the Town Centre, 6th Form College, Hospital, Darlington College, Lingfield, Morton Park should be provided. CS18 does not mention public feedback for a bus station. Bus parking by the Rail Station would meet some need, but still need to make better provision for long distance coaches, which will become more popular if car use is reduced, and the railway is almost at capacity on the mainline. Prebend Row, Tubwell Row and High Northgate are overcrowded with buses.
CSPO 053	Government Office for the North East	Object, conflicts with PPG13 para 6 that strategies in development and local transport plan should complement each other and allocations and local transport investment are linked. CS18 should bring together the spatial implications of the strategy and the sustainable transport and accessibility considerations. It fails to consider wider connectivity within the Tees Valley and Darlington's Gateway
CSPO 061	Persimmon Homes, Yuill Homes, Taylor Wimpey (Land at Beaumont Hill)	Support but CS18 should only include schemes that have a realistic prospect of being delivered. Safeguarding routes (e.g. Cross Town Route) which have no realistic prospect of public funding should be avoided to prevent blighting land in sustainable locations which could be allocated for housing. New transport infrastructure to aid the regeneration and accessibility of the Borough is encouraged, until the Community Infrastructure Levy comes in, any developer contributions must meet the tests in Circular 05/2005, where there is a direct relationship between the development and the scheme to which it is to fund. CIL will require an Infrastructure Plan to analyse local requirement and its cost; this will need to be tested on a sound evidence base. Only when plans are in place could a fair developer contribution be
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	Improvements to the existing road network to remedy congestion and traffic hotspots and more actively manage road networks is needed to improve accessibility and connectivity to, and within the Borough to facilitate a sustainable local and regional economy (draft PPS4 and RSS). The improvement of pedestrian, cycle and public transport networks is consistent with RSS. The implementation of travel plans as part of new developments is advocated in the RSS for all major developments. Improved public transport provision will act as a real incentive for people to move away from using cars. Where appropriate this should be secured by condition.
		<i>Proposed changes: The Council will seek to ensure that best use is made of the existing road network to facilitate development opportunities by: AS EXISTING.</i>
CSPO 074	North East Assembly	Consistent with RSS policies 2, 7, 10 and 54.

9.2 Improving Transport Infrastructure		
CSPO Ref	Respondent	Comments
CSPO 017	Youth Forum Area 4 Event	Upgrading the A66 would have an opposite effect to work being done to encourage people to take trips on foot, by bike or by bus.
CSPO 028	Morrisons Morton Park Event	The roads are congested, particularly in the Morton Park region. Additional development in the Morton Park area will worsen the existing road congestion. A park and ride scheme would be useful at the Torrington's Factory site.
CSPO 028	Morrisons Morton Park Event	The works to road and pedestrian/cycle route at the corner of Abbey Road/Carmel Road and corner of Millbank Road/Carmel Road causes cars to have to reverse away from the junction to allow buses to pull around the corner.
CSPO 038	England & Lyle for Northumbrian Water Ltd.	Para 9.2.6 considers whether land allocated should be reserved for the central section of the cross town route. There is a strategic water main crossing the area of the route and it would need to be protected from any development or be diverted.
CSPO 067	Theakston Estates c/o Nathaniel Lichfield & Partners	The Tees Valley Structure Plan (para 7.116) set out to assess 'the construction of A66 Darlington bypass (North)' which has not been undertaken. Given the requirement to identify solutions to congestion in north Darlington, this should be incorporated in this plan. Would help enhance accessibility around Darlington, as
		<i>Proposed changes: further technical work should be undertaken to examine transport and travel issues in the north west and north of Darlington, focussing on identified solutions to alleviate congestion 'hot spots', including an investigation into the construction of the A66 Darlington bypass (North) between Great Burdon, north of Harrowgate Village and the A1(M)/A68 interchange. This will inform medium to long term transportation solutions for the plan period.</i>
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	Roundabout needed on Burtree Lane to increase access and safety.
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	A Cross Town Route/northern bypass is needed to take wagons/traffic away from North Road and Burtree Lane to and from the A1(M) and A66.
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	Congestion needs to be reduced on West Auckland Road via a roundabout south of the garage, more stringent parking enforcement needed at Cockerton shops to reduce unnecessary congestion. A cheap/reliable bus service would reduce traffic down West Auckland Road. Buses are needed to High Grange.
CSPO 084/8	Youth Forum Area 3 Event	Traffic congestion is a problem in Darlington
POLICY CS19 - Improving Transport Infrastructure		
CSPO Ref	Respondent	Comments
CSPO 002	Darlington Branch of Alzheimer Disease Society	More pedestrian crossings outside Darlington and more parking bays outside Darlington.

CSPO 006	John Dunn	Reference is made to integrate rail with all transport modes particularly Bank Top and the town centre.
CSPO 013	Central Ward Partnership	More detailed required on the Metro and the Cross Town Route
CSPO 023	England & Lyle (Green Street Motors Site)	Current alignment of allocated route is not consistent with the proposed junction on North Road; financial viability of the scheme is questionable. Delete the allocated line of the proposed cross-town route from the Proosals Map. The affected land, including the Green St Motors Site should no longer be safeguarded. No requirement for further technical work in relation to the cross-town route.
CSPO 023	England & Lyle (Ward Bros Steel Site)	Current alignment of allocated route is not consistent with the proposed junction on North Road; financial viability of the scheme is questionable. No requirement for further technical work in relation to the cross-town route and request the removal of all reference to the cross-town route.
CSPO 025	England & Lyle (Cleveland St Site)	All reference to cross-town route be removed, the route is not considered financially viable or in accordance with the broad or national transport objectives.
CSPO 027	CPRE, Darlington District Committee	Support CS18, though we would note long-term opposition to the Cross Town Route. The 'protected corridor' should be reallocated as 'open land'/open space.
CSPO 030	GC Bartram	Support CS18 particularly the cross-town route
CSPO 033	Mr John and Mrs Valerie Whitby	Support the Cross town route from Faverdale but must have vision for future. Vision for future after recession must be brave and forward thinking. Money is available at Government level.
		<i>Proposed changes: Another 290 houses are to be released in 3 years, more factory units at Faverdale to be built, need good cross town route to elevate traffic congestion.</i>
CSPO 037	Highways Agency	Support the proposed public transport improvements identified in the short and medium term. Support improvements to the road network to ease existing congestion. In line with Circular 02/2007, wherever possible alternatives to physical improvements should be sought, utilising better network management and promoting smarter choices. In line with Guidance on Transport Assessments, would wish to see mechanisms introduced that reduce the need to travel, particularly by private car. Then would seek maximisation of the level of sustainable accessibility to sites, particularly public transport. Only as a last resort should physical improvements to the network be sought and would look at demand management measures prior to any consideration of providing additional capacity.
CSPO 037	Highways Agency	CS19 identifies that further technical work is to be undertaken to examine solutions to alleviate congestion. Concerned that there is a lack of a robust evidence base to support the development proposals and the priorities for infrastructure improvements, a lack of evidence to demonstrate that the priority improvements will provide the necessary level of mitigation to ensure that the development proposed is both sustainable and deliverable without detrimentally impacting the operation of the SRN. Would be particularly concerned if the delivery of the proposed level of development was dependant on such improvements. Would welcome clarification and consultation regarding this.

CSPO 046	Turley Associates for Durham Tees Valley Airport	Note CS19 (d) which refers to enhanced bus connections to and within the DTVA site and walking and cycling connections within the site. DTVAL continues to address sustainable travel to and from DTVA through the implementation of measures set out in the Airport Surface Access Strategy.
CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	Support. Dualling A66 is critical to the future development of the Town and improving conditions for through traffic.
CSPO 053	Government Office for the North East	Object, conflicts with PPS12 para 4.8 which requires evidence of what physical, social and green infrastructure is needed for the amount of development proposed for the area, taking account of its type and distribution. It fails to relate to the spatial strategy in the plan and its implications, particularly in relation to the strategic sites. There is reference to 'further technical work which will also be undertaken'; this evidence needs to be in place to support the choice of this preferred option.
CSPO 067	Nathaniel Lichfield and Partners for Southlands Management Ltd	The Tees Valley Structure Plan (para 7.116) committed to analyse 'the construction of A66 Darlington bypass (North)'. This has not been undertaken. Given the requirement to reduce congestion, this should be incorporated in the Core Strategy. It would help enhance accessibility, (RSS paras 2.184 and 2.191). RSS policy 10 recognises need to investigate improvements to the A66 Darlington bypass. The bypass would have several benefits including: • Removing and relieving congestion from busy routes; • Creating access to 'periphery north east' priority location; • Providing better linkages northbound from Airport; and • Enhancing the accessibility of Darlington in the Tees Valley City Region and beyond. Provision is made in the visioning exercise for periphery north east for the bypass but elements would be deliverable in advance through existing access points.
		<i>Proposed changes: Further technical work will also be undertaken to examine transport and travel issues in the north west and north of Darlington, focussing on identified solutions to alleviate congestion 'hot spots', including an investigation into the construction of the A66 Darlington bypass (North) between Great Burdon, north of Harrowgate Village and the A1(M)/A68 interchange. This will inform medium to long term transportation solutions for the plan period...</i>
CSPO 068	GVA Grimley for Mark Rudolph, PPG Land Ltd.	Support plans to improve transport infrastructure within and connecting to the Borough. Priorities should be to enhance the performance of strategic routes to, and within the Borough and the provision of sustainable transport to allow appropriate development, to facilitate sustainable economic growth and improve economic productivity (Draft PPS4). An efficient and functioning road network is essential if Darlington is to capitalise on its strategic location in the Tees Valley and attract investment and facilitate development that might not otherwise be attracted to the region. Improvements to transport infrastructure is in line with the RSS. Further technical work should be undertaken to examine traffic and transport issues in Darlington and the region to safeguard the function of the road network into the future
		<i>Proposed changes: The Council and its partners will work together to make best use of and improve transport infrastructure within and connecting to the Borough to facilitate development opportunities. AS EXISTING.</i>

CSPO 074	North East Assembly	Consistent with RSS policies 49-55, which seek to improve connectivity and accessibility within the region.
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10 - MONITORING AND IMPLEMENTING THE CORE STRATEGY		
CSPO Ref	Respondent	Comments
CSPO 039	Heighington & Coniscliffe Councillor	Paragraph 10.1 Government states parish councils should have more powers and involvement in their communities. They should be included in the monitoring, implementation process. <i>Proposed changes: Consult with Parish Councils</i>
CSPO 044	Environment Agency	Add new indicators. <i>Proposed changes: Figure 10.1 included to monitor the implementation of : CS2: % of major developments incorporating sustainable drainage schemes into their proposals; % of major developments incorporating 10% or more energy from renewable sources CS15 % loss/gain in land of high biodiversity value, Quality of groundwater within Source Protection Zones and major limestone aquifer (i.e. increase or decrease) CS16 Number of properties at risk of flooding (i.e. decrease or increase)</i>
CSPO 051	Natural England	Add new indicator <i>Proposed changes: 3rd para amend to 'the provision of site related community and environmental infrastructure....'</i>
CSPO 053	Government Office for the North East	Table 10.1 identifies 'Implementing organisation' but this does not satisfy PPS12 para 4.45 which states that evidence of deliverability must be strong enough to stand up to independent scrutiny. Must be based on sound infrastructure delivery planning with no regulatory or national policy barriers to delivery, partners who are signed up to implement different elements of the strategy and when this will happen plus coherence with neighbouring core strategies in relation to cross boundary issues. These elements of deliverability will <u>have to be in place before the Core Strategy progresses to publication.</u>
CSPO 053	Government Office for the North East	Does not fulfil the requirements of PPS12 para 4.47 which states that 'Monitoring is essential ... will provide the basis on which the contingency plans within the strategy would be triggered. The delivery strategy should contain clear targets or measurable outcomes to assist this process.' The Core Strategy helps deliver the priorities in the Sustainable Community Strategy and the Local Area Agreement and should contain clear targets/measurable outcomes to enable effective monitoring of delivery. Table 10.1 does include performance indicators but these come from the LAA rather than the policies. Welcome the use of the LAA targets but these should be expressed in spatial terms in the policies. The policies contain few targets/measurable outcomes and would fail this test of soundness.
CSPO 072	English Heritage	Table 10.1 will not provide the means to assess how successful or otherwise CS15 or the Core Strategy will be in safeguarding or constructively utilising it. The only indicator put forward relates to biodiversity which underpins CS15.

CSPO 072	English Heritage	There are no indicators put forward to measure the success or otherwise of CS17 in relation to enhancing the historic environment of the Borough. The monitoring and implementation framework is deficient in these respects.
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THE KEY DIAGRAM		
CSPO Ref	Respondent	Comments
CSPO 011	Heighington Parish Council	Key diagram should be on Ordnance Survey base as can't identify sites referred to.
CSPO 033	Mr John and Mrs Valerie Whitby	Maps in Core Strategy not user friendly, do try Ordnance Survey Pathfinder 590 Newton Aycliffe for Heighington area, it is a quarter of a mile out
CSPO 033	Mr John and Mrs Valerie Whitby	Key diagram - please explain meaning of 'strategic tourism opportunity'
CSPO 064	Barton Willmore for St Modwen Developments	The Key Diagram should be brought forward to Section 3 as it is an important visual representation of the locational strategy. This would assist the understanding the text in 3.1 of the document by cross-
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	PPS12 requires that locations for strategic developments and existing strategic development sites/locations should be indicated on a Key Diagram. The Diagram sets out key employment, general and mixed use employment housing locations but does not show key healthcare facilities such as the Darlington Memorial Hospital, which is also a major employment location.
		<i>Proposed Changes: The Key diagram should identify the Darlington Memorial Hospital as a major health facility, employment location and Hospital Area.</i>

SUSTAINABILITY APPRAISAL		
General		
CSPO Ref	Respondent	Comments
CSPO 031	One NorthEast	The contents of the report are noted. No specific comments to make.
2 - Scope of the Sustainability Appraisal		
CSPO 072	English Heritage	2.2.9 No clear or obvious theme covering cultural or archaeological heritage.
CSPO 072	English Heritage	2.3.10 Helpfully states that Borough is possessed of a rich and varied natural and historic environment, but little accompanying commentary to support this.
CSPO 072	English Heritage	2.3.13 Topics concerning listed buildings, scheduled ancient monuments and conservation areas are considered relevant to delivery of certain Objectives. It is not clear, how this is so. Achieving a More Sustainable Community says little about listed buildings, scheduled monuments or conservation areas.

CSPO 072	English Heritage	2.1.22 Environmental issues are couched in terms of design considerations and environmental protection. Welcome para 2.4.22 which seeks protection and enhancement of all types of heritage asset and cultural diversity, especially including railway heritage. But having identified this as an issue, the Core Strategy itself provides little in the way of a response to it.
CSPO 072	English Heritage	2.5.3 Calls for development to reflect the heritage of the town but unfortunately this is narrowly referred in terms of its relationship to the retail, tourism and cultural landscape only.
CSPO 072	English Heritage	2.5.9 Welcome SO6 pertaining to the historic environment.
CSPO 072	English Heritage	Paras 5.12.37-40 advise that the heritage of Darlington is important, but there is no explanation as to how the effects of the Core Strategy upon it will be monitored. Para 5.12.39 provides the makings of one possible indicator.
3 - Sustainability Appraisal Framework		
CSPO 072	English Heritage	3.2.9 Content with SA10 and its accompanying objectives.
4 - Testing the Core Strategy Objectives against the SA Objectives		
CSPO 072	English Heritage	4.1.5 Table 4.2 identifies conflicting SA and CS Objectives. Welcome the positive approach that Objective 10 is not thought to conflict with any others.
5 - Developing Options for the Core Strategy		
CSPO 072	English Heritage	5.5 Table 2.1 this theme has a relationship to the historic environment but para 5.5.11 refers only to built characterisation, rendering the historic environment invisible. It leads to no recommendations in respect of the policies under this theme and uncertainty in respect of satisfying SA10.
CSPO 072	English Heritage	Para 5.5.31 Given that heritage assets and their settings can be affected directly and indirectly by renewable energy schemes it is surprising that there are not recommendations regarding mitigation in respect of the historic environment. Unclear as to how the policy scores well in relation to SA10 and explains why there is no reference to heritage protections in CS4 itself.
CSPO 072	English Heritage	5.6 Table 5.5 acknowledges possible conflict between policies on new housing and local distinctiveness, but expected some correlation with CS14 in the recommendations set out in para 5.6.9.
CSPO 072	English Heritage	5.7 Supports the adaptive use and reuse of historic built fabric. Para 5.7.16 ought to contain mitigation measures for safeguarding of the historic environment.
CSPO 072	English Heritage	5.8 Recommendations for this theme might include mitigation for the historic environment. In what ways will it help meet SA10?
CSPO 072	English Heritage	5.9 Refers fleetingly to the enhancement of the historic environment, but makes no mention of it whatsoever. Unclear as to how it scores well in relation to SA10.

CSPO 072	English Heritage	Contains Table 5.3 looks at a number of receptors that may be subject to cumulative effects and their possible causes. Heritage assets are not identified as potential receptors in the same way that components of the natural environment have been. A further possible cause as to how the effects upon local distinctiveness is a failure to properly manage the historic environment.
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6 - Conclusions and Recommendations

CSPO 072	English Heritage	It is regrettable that this section contains no recommendations to strengthen the Core Strategy in respect of the historic environment. The SA/SEA does not sufficiently fully satisfy the requirements of the SEA Directive.
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Appendices

CSPO 072	English Heritage	Appendix A - Please cross refer to English Heritage guidance.
CSPO 072	English Heritage	Appendix B and C - Indicators and targets concerning the historic environment are not sufficient in their coverage to adequately or satisfactorily measure the performance of the plan in regard to safeguarding cultural heritage. The SA/SEA fails to satisfy the SEA Directive.
CSPO 072	English Heritage	Appendix D - Uncertain as to why there is reference to natural assets in this section of the appraisal. Unclear as to why CS Objective 3 only has a neutral affect to SA10. The historic environment is an integral part of the sustainability agenda. Heritage assets are a finite resource, once lost they are lost forever. Safeguarding and making best use of our historic environment is one means of reducing our ecological footprint.

GENERAL OR OTHER COMMENTS

CSPO Ref	Respondent	Comments
CSPO 001	Hummersknott Councillor	Current evidence appears to show Durham Tees Valley Airport becoming less influential as a regional
CSPO 001	Hummersknott Councillor	Underlying theme 'lifestyle choices will be changed by environmental improvements' not supported by historical evidence.
CSPO 002	Darlington Branch of Alzheimer Disease Society	Bus station rebuild to come in line with other parts of Darlington.
CSPO 002	Darlington Branch of Alzheimer Disease Society	Like to see more community in & around Darlington. More planning places outside, drop in centres for elderly people in their area.
CSPO 002	Darlington Branch of Alzheimer Disease Society	More housing curbs around outside Darlington for disabled people. More improvements down Duke Street and Bondgate areas, need clearing up and bringing up to standard.
CSPO 004	Civil Aviation Authority	General advice provided - requirements of CAA in relation to Civil Aerodromes, Telecom Installations, Wind Turbines, High Structures Venting and Flaring.

CSPO 005	Health & Safety Executive	HSE does not have resources to check the document but refers local authority to PADHI+
CSPO 007	NOMS	General comments in relation to requirements of NOMS/HM Prison Service. NOMS requests the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period.
CSPO 009	Eastbourne Event 121108	More directions are required with regard to the location of venues being used, possibly broad directions or a map showing venue locations.
CSPO 009	Eastbourne Event 121108	People of Darlington are cynical of consultation and consultation fatigue exists.
CSPO 012	Mr S Howarth	Draft policies incorporated are far too loose and undeveloped.
CSPO 013	Central Ward Partnership AGM	Interest in possible cultural quarter and the future car dealership site. Impact on nursery is a concern.
CSPO 014	Youth Forum Area 1 Event	Activities, cost of leisure and discounts for young people all high importance
CSPO 015	Darlington Association of Parish Councils	Disappointed in feedback response as they put in lengthy comments at issues and options stage
CSPO 016	The Theatres Trust	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities.
CSPO 019	Darlington Cycling Campaign	Still a strong sense that 'green issues' are being compartmentalised (ghettoised?).
CSPO 020	North Yorkshire County Council	The document would not seem to pose any issues of significant concern for north Yorkshire. An emphasis upon sustainable development throughout the document is welcomed.
CSPO 026	National Grid	General comments made in relation to the role of the National Grid in the supply of gas and electricity. Seek future consultation in relation to DPD's on a wide range of issues e.g. landscape policies, policies relating to development in the countryside etc. No electricity transmission assets within the administrative area, some gas transmission assets within the administrative area.
CSPO 028	Morrisons Morton Park Event	A resident from Long Newton stated that although she lived in Stockton, she came to Morrisons Morton Park as it was easier for her.
CSPO 027	CPRE, Darlington District Committee	Overall an excellent document which can be a firm basis for the future development of Darlington. Concern that the policies which replace the Local Plan are not as detailed and are open to interpretation which could be negative. If these matters are to be dealt with in supplementary guidance it would be useful to have a list giving what additional documents exist or are to be compiled, preferably with dates. The current diversity of documents is confusing and risks important matters not being considered. Compiling a glossary may deal with the issues which does not bulk out the document.
CSPO 033	Mr John and Mrs Valerie Whitby	Did this happen no! Cross community interactive listening mechanism intended to enhance a creative - none interventionist development strategy.
CSPO038	England & Lyle for Northumbrian Water Ltd.	The Local Plan Policies T52, T53, T54 and T55 are not listed in Appendix 1 to be replaced. Would like it confirmed these are to be saved and remain in force.

CSPO 047	Ward Hadaway for The Dean and Chapter of Durham	This is a well put together document that encapsulates the issues facing Darlington and the policies proposals are generally a pragmatic response.
CSPO 050	Low Coniscliffe & Merrybent Parish Council	Thoughts must have been similar to the majority since they have been taken onboard in this document.
CSPO 051	Natural England	Pleased to find the Issues & Options (Feb 2008) addressed many key issues. Many of these have been included in the Preferred Options but have not been adequately or effectively addressed. Concerned that many policies are unlikely to meet the effectiveness test set out in PPS12 because of ambiguity and lack of clarity in text and policy.
CSPO 053	Government Office for the North East	Try to help local authorities minimise the risk of submitting unsound documents by making comments at earlier stages of document preparation, particularly at the preferred options stage. The draft Core Strategy does have some strengths, particularly in the regard for the Sustainable Community Strategy, there are key areas where the document is very weak. Have major reservations about this report which raise fundamental issues in relation to soundness and need to be addressed before publication.
CSPO 053	Government Office for the North East	Realise the LDS is being reviewed, would urge submission of a revised LDS to reflect the revised timetable for the Core Strategy and other documents. PPS12 para 4.54 states that 'Core strategies should be produced to the timetable set out in the Local Development Scheme' to ensure that effective programme management techniques are used in progressing the core strategy and orchestrating the production of the
CSPO 053	Government Office for the North East	Appendix 2 identifies 'key studies underpinning preparation of the core strategy' several of which were not available for the preparation of the preferred options. PPS12, para 4.37 requires plans to be based on thorough evidence and that the choices made in the plan are backed up by the background facts. The selection of options should be informed by the evidence base so it should be substantially complete at the preferred options stage. If not, it will be difficult to demonstrate that the plan's strategy is justified.
CSPO 054	Mr J Sturrock	Promotion and detailed information regarding 2 sites for future residential development to meet local housing needs. The sites were not submitted through the SHLAA consultation process. Will need clarification if these sites can be considered in SHLAA at this stage.
CSPO 070	National Council of Women of GB	The plans and ideas for the future of the Town are already fairly settled and points raised have been addressed in a letter on 30 November dated 17 November 2008 from Timothy Crawshaw.
CSPO 082	Faverdale Ward Surgery, Alderman Leach School, Faverdale	The Council does not listen and respond to views specifically expressed since the last Core Strategy consultation.
CSPO 088	GOLD Members	Good planning for the aged can make a difference to peoples later years.
CSPO 090	Eko Planning for County Durham & Darlington NHS Foundation Trust	Requires a Glossary to define what constitutes social, community and cultural facilities.

		<p><i>Proposed changes: 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 centres, community centres 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.</i></p>
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