

DARLINGTON LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY

INITIAL RESPONSES OF DARLINGTON BOROUGH COUNCIL TO REPRESENTATIONS MADE ON THE CORE STRATEGY PUBLICATION DRAFT

Darlington Borough Council

NOVEMBER 2010

INTRODUCTION

This schedule sets out a summary of the duly made representations received and the Council's initial responses to them following the publication of the LDF Core Strategy Publication Draft in August 2010. The Council's reserves the right to amend its position from these initial responses in any later statement that it may submit as part of the Examination into the soundness of the Core Strategy.

Unless indicated otherwise, the exact wording of the changes proposed are set out in the 'Proposed Minor Amendments to the Darlington LDF Core Strategy' Document (doc ref. CD009), that can be viewed via the Core Strategy page of the Council's website, www.darlington.gov.uk/planningpolicy.

Representation Ref. No.	Representor	Representation Summary	Initial Response	Change Proposed
General				

Representation Ref. No.	Representor	Representation Summary	Initial Response	Change Proposed
003/01/CSO/*	L. Hume, resident	<p>The soundness of policies will always be suspect as it has to contend with local politics at the time planning applications are considered.</p> <p>In the present economic climate, anything to do with planning should be put on hold.</p>	<p>The use that policies are put to by the local planning authority is a separate issue to plan preparation. Assumptions about the former do not negate the need to put in place an up to date development plan for the area. There is a legal requirement on local authorities to prepare local development documents under the Planning and Compulsory Purchase Act 2004. Preparation of this Core Strategy is a key element of this, as it will be the principal document of the Darlington Local Development Framework.</p>	Propose no change.
006/01/CSO/S	Government Office for the North East	Consider the Core Strategy legally compliant and sound.	Noted.	No change proposed.
027/01/0/*	Pegasus Planning Group for Miller Homes Ltd North East.	Following the revocation of the RSS, the Core Strategy does not sufficiently communicate the significance of the key RSS policies referring to strategic sites.	<p>The Council has chosen to continue to support regional planning aspirations in its LDF, as these match very closely the regeneration and economic development ambitions and priorities set out in its own Darlington Gateway Strategy (SD021). Whilst important regionally, at a local level and in terms of overall job creation, the key employment locations at Faverdale and Heighington Lane are of complementary significance to early priorities for employment generation as part of regionally important mixed use projects in Central Darlington at the town centre, Town Centre Fringe and Central Park.</p> <p>The Council acknowledges the importance of the Faverdale area in general for employment uses, specifically for distribution and logistics, in the Core Strategy, as appropriate for a strategic planning document. There are references to the Faverdale area that reflect this at para 3.1.10 and 4.1.6, and in Policy CS5.</p>	Propose no change.

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Para 1.7 (wrong ref)				
025/01/CH1/23	Coal Authority	Suggest additional wording to clarify that mineral safeguarding areas and waste proposals from the Tees Valley Minerals and Waste Core Strategy relevant to Darlington will be included on the Darlington LDF Proposals Map.	Agree, but with a revised suggested wording, as there are no waste proposals for Darlington in the Minerals and Waste DPDs.	Include in the schedule of minor changes (CD009), to amend wording of para 1.7
Table 2.2				
017/01/CH2/*	English Heritage	The historic environment is not sufficiently acknowledged for its important contribution to addressing the sustainable community strategy (SCS) issues identified.	The policy on local distinctiveness (Policy CS 14), in which the historic environment is a key element, is referenced as helping to address three out of the twelve SCS issues identified. It could also be referenced in the issues 'helping businesses to grow and attract new ones' and 'minimising carbon emissions....'.	Included in the schedule of proposed minor amendments (CD009).
Table 2.3				
017/01/CH2/*	English Heritage	With regard to the provision of suitable available employment land, it would be appropriate to also acknowledge the potential of the existing building stock to contribute towards job creation; many that are no longer required for their original use are capable of being adapted to accommodate new uses, and/or being retro-fitted to incorporate energy efficiency measures.	The list in Table 2.3 is not meant to be exhaustive and is only a summary. The justification for mentioning new employment land is that the economic impact of providing new employment land is much greater than any from the re-use of existing buildings, though it is acknowledged that the latter has a role to play in providing employment space overall.	Propose no change.
2.23				
024/01/CH2/S	Barton Willmore for St. Modwen Developments	Largely supports the Spatial Vision	Noted	No change.
2.24				
027/02/CH2/12	Pegasus Planning Group for Miller Homes Ltd North East.	There should be a reference to Faverdale key employment location in the spatial vision.	The spatial vision is broad brush and not intended to be comprehensive in its mention of every development location identified in the subsequent policies.	Propose no change.
2.26				

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024/02/CH2/S	Barton Willmore for St. Modwen Developments	Whilst agreeing that previously developed land (PDL) within the urban area should be the priority for development, this should not prejudice the development of sustainable, deliverable greenfield sites.	The locational strategy (Policy CS1) identifies strategic locations for new development that include both greenfield and PDL, allowing the delivery of the most sustainable greenfield sites. The phasing outlined in Policies CS5 and CS10 for employment and housing development respectively do give priority to use of PDL and achievement of regeneration objectives. Policy CS10 and the Housing Implementation Strategy outline the conditions under which greenfield land could be brought forward in advance of or alongside the development of PDL. Policy CS5 sets out the phasing and priorities for bringing forward employment land. It is clear that some employment land in some greenfield locations, such as Faverdale, could be brought forward at any time during the plan period, independently of any progress or otherwise of bringing forward PDL for employment uses.	Propose no change.
027/02/CH2/12	Pegasus Planning Group for Miller Homes Ltd North East.	The spatial vision does not reflect that housing provision cannot be accommodated entirely on previously developed land. It should refer to residential development on greenfield land too.	This is implicit in para 2.26 which states that ‘a growing population will have been accommodated in new housing constructed making use, as far as possible, of underused land and buildings within the existing urban area’. Policy CS1 explains in more detail.	Propose no change.
2.29				
017/01/CH2/*	English Heritage	Paragraph 2.29 should separate out ‘cultural’ and ‘historic’ assets by citing Darlington’s historic environment and heritage assets as a reason to visit the area. Suggest that the Spatial Vision be amended to more explicitly acknowledge the contribution the historic environment can and should make to its achievement, thereby better reflecting the key message in Policy HE3.4 of PPS5.	A vision is a general strategic statement that should be reasonably succinct. However, a minor change could be made to add in ‘and historic assets’ to explicitly reference it.	Amendment proposed in CD009, para 2.29 to read ‘.....exceptional retail, cultural and leisure facilities and historic assets will also be cited’
2.30				

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027/03/CH2/S	Pegasus Planning Group for Miller Homes Ltd North East.	The objectives should identify key sites, e.g. Faverdale that will deliver the objectives; otherwise the objectives could apply to anywhere.	The objectives are Darlington specific, e.g. 1 and 2 relate to the two key strands of the sustainable community strategy, 'one Darlington' and 'perfectly placed'. There are specific references to Darlington and the Tees Valley in three other objectives. It is the role of the policies in the Core Strategy to identify the locations where new development will take place to help deliver the strategic objectives. It will be the role of the Accommodating Growth DPD to identify the specific sites within each strategic location that will deliver the strategic objectives.	Propose no change
CS1				
Section 3.1				
007/01/CS1/S	England and Lyle for Ward Bros (Steel) and Baydale Properties	Consider the Core Strategy legally compliant and sound. Particular support for CS1 and the vision for future growth and development.	Noted	No change proposed.
010/01/CS1/S	England and Lyle for Northumbrian Water	Consider the Core Strategy legally compliant and sound. Essential that any water supply problems requiring reinforcement of the network be planned in with early discussion with the Council	Noted.	No change proposed.
016/01/CS1/123	Smiths Gore for Durham Cathedral	<i>Policy CS1 and para 3.1.10</i> Seek rewording to CS1 to indicate that the priorities for new housing locations will be informed by the forthcoming Allocations DPD, and further detailed site assessment work that will be carried out as part of that. Consequently, wish final sentence of 3.1.10 to be removed	PPS12 (para 5.3) indicates that DPDs other than the Core Strategy provide additional detail which would not be suitable in a core strategy, and that a DPD must be used to allocate sites. It also makes clear (para 5.2(4)) that it is the core strategy that should make clear spatial choices about where development should go. The role of the Accommodating Growth (site allocations) DPD will be to identify the specific sites where housing will be delivered in the strategic locations identified in the Core Strategy. The priorities for new housing locations has been informed by the strategic housing locations options appraisal (SD003). This is a strategic level options appraisal, recording the characteristics of broad locations, and is	No changes proposed.

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			considered appropriate for a Core Strategy. The Council will be carrying out more detailed site assessments during the Regulation 25 stage of Accommodating Growth DPD plan preparation.	

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024/04/CS1/S	Barton Willmore for St. Modwen Developments.	Suggest key diagram is brought forward and included in the locational strategy section (3.1).	Agree that this would be a suitable alternative location. However, the back of the document is an easy place to find the Key Diagram, whichever part of the Core Strategy users are looking at. Its location is clearly indicated on the Contents page.	Propose no change.
024/04/CS1/S	Barton Willmore for St. Modwen Developments	Seek clarification as to the level of housing and employment provision proposed at the North West Urban Fringe.	Section 3.1 sets out the overall locational strategy and the reasoned justification for it. The level of housing and employment provision proposed at each strategic location is set out in Policies CS10 and CS5 respectively. Policy CS10 indicates that 700 new dwellings are planned for the North West Urban Fringe. Policy CS5 is less clear about how much land is identified for employment at Faverdale, and whilst the Key Diagram clearly indicates it to be within the North West Urban Fringe, a minor change to the reasoned justification to Policy CS5 would provide clarification at that point in the document. Clarification of the amount of land to be identified at each of Faverdale and Heighington Lane key employment locations is suggested to Policy CS5, and these reflect the recommendations of the Council's Employment Land Review 2009(SD017).	Propose amendment to Policy CS5 as follows (amendment in bold); '....A further 125ha of employment land will be made available at the key employment locations of Faverdale (about 120ha) and Heighingotn Lane (about 5ha) , for development.....' This proposed change is not in the CD0009.
Para. 3.1.4				
017/02/CH3/*	English Heritage	Could improve by highlighting that development will not be ruled out simply because it incorporates heritage assets, unless it would cause demonstrable harm to their significance and value. This would better reflect the Government's objective to ' <i>recognise that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term</i> ' and ensure optimum use is made of heritage assets.	This level of detail is not appropriate here. It is more appropriate to the reasoned justification of a detailed policy. Also, this is already set out in national policy (paragraph 7 of PPS5, 2010) and as such, does not need repeating in the LDF.	Propose no change.
CS1				
023/01/CS1/123	England and Lyle for Manners Family Trust and Mr and	The strategic locations, individually and collectively, will fail to deliver the vision, because the market for development	The Core Strategy plans for the 15 years from 2011-2026. It is not anticipated that existing weak market conditions will prevail much beyond the initial years of	No change proposed.

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	Mrs Morgan.	<p>on previously developed land is questionable, calling into question the ability to deliver the amount, type and timing of housing proposed in the Core Strategy for Central Park and the Town Centre Fringe.</p> <p>The identification of land on the north western and north eastern urban fringes as strategic housing sites does not represent the most appropriate strategy when considered against the reasonable alternatives. Suggest the Western Urban Fringe as a suitable alternative strategic location.</p> <p>Consider the housing locations options appraisal fundamentally flawed. Provided an alternative appraisal that indicates Western Urban Fringe as more sustainable.</p>	<p>the plan period. In Chapter 10 of the Core Strategy, it is acknowledged that public sector involvement will be required to bring forward development at Central Park and the Town Centre Fringe locations. The Council and its partners have a good track record of demonstrating the commitment and creativity necessary to secure and spend funding to kick start regeneration initiatives, and has the support of the Tees Valley Local Economic Partnership in doing so. The Council can be confident of securing public funding for these locations as both are important to the achievement of regional and sub-regional economic and housing objectives. Finance is likely to be sought from new sources of funding, such as the Regional Growth Fund and the use of initiatives like tax increment financing, asset backed vehicles, and recycling new homes bonus funds. Private sector partners will also be essential.</p> <p>There is already a masterplan and planning permission in place to deliver a mixed-use development at Central Park, and over £15 million of public funding underpins delivery there.</p> <p>The Town Centre Fringe has attracted £308,000 of public funding so far, a draft masterplan is to be published for consultation in Spring 2011, and a Town Centre Fringe Action Area Plan is included in the Council's current Local Development Scheme. New housing completions are not planned in the Town Centre Fringe until the period 2016-2021. This gives enough time for the remaining feasibility studies and funding packages to be put in place to deliver the new development proposed.</p> <p>There is also flexibility built into the delivery of housing in the strategic locations included in (Policy CS10), whilst bringing forward the employment required to deliver the vision does not depend on all the land in every employment location being developed; the portfolio provides a range a choice of sites for a range of potential end users.</p>	

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			<p>The Strategic Housing Locations Options Appraisal (SD003) is considered appropriate to inform the identification of Core Strategy locations. More detailed appraisal work will be carried out on specific sites during preparation of the Accommodating Growth DPD.</p>	

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017/02/CH3/*	English Heritage	Could be improved by making it clear that sites for CHP/renewable and low carbon energy generation will be assessed on a case by case basis and installations will not be located where they would be likely to cause harm to heritage assets, in accordance with PPS22: <i>Renewable Energy</i> .	This level of detail is not appropriate in this section. It is more appropriate to the reasoned justification of Policy CS3. Protection of historic assets is covered by Policy CS14.	No change proposed.
018/01/CS1/123	GVA Grimley for Durham Constabulary	Policy is reasonable but want the role of Police in place making considered. The Policy are part of community infrastructure, and expect any new police provision required as a consequence of new development to be provided through planning obligations	The detailed means of providing such infrastructure, or other resources for policing, are not matters for Policy CS1.	No change proposed.
024/04/CS1/S	Barton Willmore for St. Modwen Developments	Whilst welcoming references that the North West Urban Fringe and the Faverdale area has potential as a strategically important logistics, distribution and large, modern, general employment area, Faverdale also has the potential to accommodate other uses, such as residential. Policy should be flexible enough to deal with changing circumstances.	The locations for new housing development were identified following a strategic housing locations options appraisal (SD003), first published in January 2010 and updated in June, and taking into account the findings of sustainability appraisal. This resulted in the identification of the North West Urban Fringe as a strategic location for new development. The Key Diagram shows that the Faverdale area is part of the wider North West Urban Fringe area, and whilst it is specifically identified for employment uses in CS5, housing development is not explicitly ruled out. Whether or not this part of the North West Urban Fringe includes the land that is most suitable for allocation to deliver 700 new houses will be determined through the preparation of the Accommodating Growth DPD. Regard will be had to Policy CS5 and its reasoned justification, which highlight the important role and uniqueness that land at Faverdale has in the Council's employment land portfolio, and in regional and sub-regional economic growth ambitions.	No change proposed.
026/01/CS1/S	GVA Grimley for Dobbies Garden	A Dobbies Garden World in the North West Urban Fringe Area would help to	It is not the role of the Core Strategy to do this.	No change proposed.

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	Centres	facilitate and deliver the policy aspirations, and should be acknowledged within the Local Development Framework policy.		
027/04/CS1/2	Pegasus Planning Group for Miller Homes North East	Explicit reference should be made to the 120ha key employment location of Faverdale in the policy (it only talks about the general location of the North West Urban Fringe). It is given no prominence compared with other strategic locations, even though it is of regional strategic significance.	Policy CS1 was only intended to refer to general locations and broad priorities, but does refer specifically to Policy CS5, where more details about areas within broad locations (such as Faverdale) can be found. The Faverdale area is given prominence in Policy CS5. It indicates that land in key employment locations (including Faverdale) will be made available throughout the plan period and, separately, that employment land provision of about 50ha will be made available throughout the plan period, as a second priority. See also response to 027/01/0/* .	No change proposed
CS2				
010/02/CS2/S	Northumbrian Water Ltd	Supports CS2 but particularly seek the retention of criteria (e), (f) and (g) and para 3.2.3 in the final, adopted Core Strategy.	Subject to examination the Council proposes to retain CS2 and its supporting text in its published form.	No change proposed
017/02/CH3/*	English Heritage	PPS5 is not well represented in this policy; CS2b could be reworded to address this.	Promoting and enhancing the Borough's heritage and local distinctiveness is a key aim of the overall approach to providing high quality design in new development.	Reword CS2b to more fully reflect the principles of PPS5 (see CD009)
017/02/CH3/*	English Heritage	Further monitoring indicators should be included, e.g. the extent to which heritage assets are lost or harmed, or conversely, converted/adapted/renewed and/or removed from risk as a consequence of new development.	Additional heritage monitoring indicators are identified to support CS14. These are considered sufficient to reasonably monitor heritage.	No change proposed
018/02/CS2/123	Durham Constabulary	The importance of designing out crime could be further emphasised by adopting Secured by Design for all new development which would provide a	Promoting community safety is a key element of good quality design. The principles of Secured By Design provide appropriate standards to help create a safe and secure environment. This is identified as a key	No change proposed

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		benchmark to enable effective monitoring.	requirement of new development at CS2c.	
023/02/CS2/S	Manners Family Trust and Mr & Mrs Morgan	Consider CS2 to be sound in that it establishes a sensible range of criteria against which to assess development proposals. Housing development on the Western Fringe Option would readily comply with all of assessment criteria listed.	Noted.	No change proposed
024/05/CS2/2	St Modwen Developments Limited	It states that the priorities will be elaborated upon in the Design SPD. But the Council has already adopted this document so it may not reflect the principles of CS2.	It is essential that all future DPDs and SPDs reflect the principles and/or elaborate upon the policies of the Core Strategy. The Design SPD will be revised following the adoption of the Core Strategy to ensure consistency with the parent document.	Amend Para 3.2.5 to clarify this approach (see CD009).
024/05/CS2/2	St Modwen Developments Limited	Reference to the Code for Sustainable Homes is inflexible to changing circumstances. It is unnecessary to include it as these standards are intended to be implemented through Building Regulations so CS2 would interfere with national policy.	It is important that new sustainable design is incorporated in all new development to help reduce carbon emissions and help adapt to climate change. The appropriate monitoring standards are the national sustainable building standards set out in CS2; not all of the requirements of these standards are incorporated in Building Regulations or are proposed to do so. To ensure there is no gap in policy it is important that these standards and any changes to them are required in design. To promote flexibility to deal with any changes para 3.2.3 states that design will be expected to meet the appropriate national sustainable building standards or those of any equivalent scheme.	No change proposed
CS3				
002/02/CS3/123	Bussey & Armstrong	Generally supports the intent of CS3 but the requirement for at least 20% on site provision of decentralised and renewable or low carbon sources of energy in the strategic locations is not adequately justified, the wording is ineffective, and the approach is inconsistent with Government	All developers in Darlington need to future proof their schemes to take into account the Government's Code for Sustainable Homes timetable: new homes to have 44% fewer carbon emission from 2013 and for all new homes to be zero carbon from 2016 so that over a year, the net carbon emissions from energy use in the home would be zero. Given that the likely phasing of new development, particularly at the strategic	Amend para 3.3.7 to justify the 20% target New - Not in CD009.

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		guidance.	<p>locations will be from 2016, zero carbon homes will be required. To achieve this standard some form of renewable energy would be required.</p> <p>Given the scale of the development at the strategic locations and likely heat and electricity demands it was considered that overall the strategic locations could support a higher level of on site renewable provision. A range of options were considered but 20% was recommended as this was considered to be the likely trigger point for communal scale systems which the strategic locations could support most cost effectively in comparison to other technologies. However CS3 also states that these targets will only be applied 'unless it can be shown that it is not feasible or viable' not to do so.</p>	
002/03/SD/*	Bussey & Armstrong	Para 3.3.7 states that the justification for the 20% target is that new development 'is likely to significantly add to the Borough's overall energy demand'. Section 2.3 of the energy study suggests that new growth could increase CO2 per annum by 6% in 2026 and 'new development will not have a significant impact on the Borough's annual emissions'. If the strategic locations are a proportion of the 6% projected increase the use of the 20% target is incorrect and is inconsistent with the evidence base.	The energy study suggests that the requirements for on-site locally generated renewable and low carbon energy will help reduce the overall energy demand. Without on site provision the impact from new development would be higher. It is therefore reasonable to include the 20% target to ensure that the impact from new development is minimised.	No change proposed
002/03/SD/*	Bussey & Armstrong	The energy study fails to demonstrate that the 20% target is viable and that there are 'particular and demonstrable' opportunities for greater use this energy at the strategic locations. Table 4.1 of the energy study states that the 10% target figure for all major developments should be viable and feasible because there are a range of	See response to 002/02/CS3/123 above.	Amend para 3.3.7 to justify the 20% target

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		technologies to achieve this and the policy is implemented in Darlington; this is reasonable. Table 4.1 suggests that the scale of development means that the 20% on-site provision is 'likely to be viable and feasible for most strategic locations' and is 'likely' to be required given lead-in times and phasing to meet the Government's zero carbon timetable. It is not appropriate to rely on future requirements and provide no supporting evidence.		
002/03/SD/*	Bussey & Armstrong	The energy study provides little evidence to identify 'particular and demonstrable opportunities for greater use' at the strategic locations of these technologies to justify the 20% target; in the North West Urban Fringe strategic location, it only identifies West Park Hospital as a potential site for Biomass CHP without reference to viability or feasibility or the intentions of the hospital.	It was not the purpose of the energy study to identify technologies to meet the 20% target. See response to 002/02/CS3/123 above.	No change proposed.
002/02/CS3/123	Bussey & Armstrong	It is acknowledged that CS3 allows for lower levels of on site provision where the 20% target is shown to be unviable or not feasible but the absence of clear justification for the requirement means that developers will not know what is required of them.	See response to 002/03/SD/* above.	Amend para 3.3.7 to justify the 20% target. New - Not in CD009.
008/01/CS3/1	Durham County Council	It is unclear whether there is capacity for wind energy development in the north east part of the Borough, whether this is a preferred area of search or whether assessments for sites and their impacts should be assessed for this part of the Borough.	The reference to the north eastern part of the Borough relates to the landscape and visual impact assessment that has been undertaken. The supporting text does not suggest areas of search. Appropriate assessments should be undertaken for all wind energy developments irrespective of their location.	Amend para 3.3.3 to clarify reference to north eastern part of the Borough. New - Not in CD009.
009/01/CS3/23	PPG Land Ltd	The promotion of renewable energy is welcomed in the context of sustainable		No change proposed

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		development and climate change, as is the recognition that site constraints and/or abnormal development costs could prohibit the achievement of prescriptive sustainability standards and targets.		
009/01/CS3/23	PPG Land Ltd	But CS3 should be applied on a site by site basis with consideration given to the viability of on-site or renewable energy generation and its overall contribution to the energy needs, as well as any sustainability measures already in place to reduce environmental impacts.	CS3 states that application of the on site renewable targets will be applied unless it can be shown that it is not feasible or viable. The on site provision required will reflect the anticipated total baseline energy supply of each development based on the proposed mix of uses and the scale of development as well as other sustainable measures planned.	Amend para 3.3.7 to clarify implementation of on site targets New - Not in CD009.
009/01/CS3/23	PPG Land Ltd	Contributions to a carbon management fund should be directly related to the scale and impact of the development whilst taking into account the viability of the development and any additional unforeseen development costs, as well as the impact of any sustainability measures that may already be in place.	Contributions to a carbon management fund will reflect the anticipated total baseline energy supply of each development based on the proposed mix of uses and the scale of development as well as other sustainable measures planned.	Amend para 3.3.7 to clarify implementation of carbon management fund. New - Not in CD009.
011/01/CS3/1	The Church Commissioners for England	Support the inclusion of the policy and the identification of areas in the urban fringe for small scale wind energy development but object to the omission of area of search for new wind farm development, particularly to the north west part of the Borough which is contrary to the evidence base set out in the Darlington Renewable and Low Carbon Energy Study.	The Energy study identifies the accessible wind resource based on technical and environmental constraints only; this shows the potential that exists and is not intended to be used as an area of search. Renewable energy is promoted across the Borough subject to the details of CS3 so it would not exclude the north west part of the Borough.	No change proposed
017/02/CH3/*	English Heritage	Support the commitment to reduce energy demand and welcome the acknowledgment of heritage as a sensitive receptor to be taken into consideration when deciding the location of renewable energy schemes. Welcome the flexibility provided by	The Borough's heritage is a valuable asset that should be appropriately protected and where appropriate enhanced. It is intended that CS3 (a) covers the historic environment.	For clarification amend CS3 (a) to include reference to the historic environment New - Not in CD009.

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		CS3 and the accompanying text regarding environmental constraints and the ability to deliver on site. Should better reflect PPS5 by referring more specifically to safeguarding the Borough's 'historic environment' and its 'heritage assets' when considering the effects of renewable energy schemes.		
022/01/CS3/123	Banks Renewables	Object to the removal of the areas of least constraint for wind farm development in the north east part of the Borough as it is a lost opportunity to focus the strategic search for new development.	Renewable energy is promoted across the Borough subject to the details of CS3; so the north east part of the Borough is not excluded. It would be for a developer to demonstrate that a particular location is appropriate for wind energy.	No change proposed
022/01/CS3/123	Banks Renewables	CS3 should go further than para 3.3.3 and acknowledge that the north eastern part of the Borough has been shown to have the wind resource and landscape capacity to accommodate a commercial wind farm subject to full environmental assessment.	It would be inappropriate to include this level of detail in a strategic planning document.	No change proposed
022/01/CS3/123	Banks Renewables	Welcome the recognition that by 2020 Darlington should be generating 15% of all energy from renewable sources but recommend that this be expanded to mention the need to achieve 30% of electricity generation from renewable sources by 2020, consistent with the Renewable Energy Strategy 2009 as the technologies for renewable electricity generation (particularly wind turbines) are more advanced. CS3 should set a local target to meet 30% of its electricity needs from renewable energy by 2020 to facilitate the production of 153 GW hours per annum.	It is important that Darlington contributes to reducing carbon dioxide emissions; to do this successfully it must include reducing demand for energy from heat and electricity. Para 3.3.2 sets out the anticipated increase in heat and electricity demand in Darlington which is considered to be appropriate targets to reduce at a local level. The Council does not have robust evidence to justify setting a local target to meet 30% of its electricity needs from renewable energy by 2020.	No change proposed
022/01/CS3/123	Banks Renewables	Welcome the "significant weight" to be given to the wider environmental, social	Noted.	No change proposed

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		and economic benefits of renewable and low carbon energy generation.		
022/01/CS3/123	Banks Renewables	Para 3.3.6 indicates that further policies will be developed through the DPD to “ensure there are no significant adverse impacts on the amenity of neighbouring residents and other sensitive receptors”. Advise that it is possible that significant adverse impact will be outweighed by the environmental benefits of a development.	The DPD will set out a policy showing how the impacts upon the natural and built environment, residential amenity and other sensitive receptors will be expected to be managed.	No change proposed
023/03/CS3/123	Manners Family Trust and Mr & Mrs Morgan	Consider that the 20% target is insufficiently robust and aspirational; it should be raised to at least 60% if strategic locations are to have any material impact upon carbon dioxide emissions. It is estimated that this target will be achieved and exceeded on the Western Fringe site through a combination of commercial scale photovoltaics, domestic scale installations and a small scale wind turbine on site.	The Council does not have robust evidence to justify setting the minimum on site renewable energy target higher than 20%. However the target is a minimum; CS3 would support a developer providing more than 20% from on site renewables.	No change proposed
023/03/CS3/123	Manners Family Trust and Mr & Mrs Morgan	Biomass is not favoured because the Darlington Decentralised Renewable and Low Carbon Energy Study states that there “is very little resource” in the Borough. This uncertainty applies equally to the North West and North East Fringes where biomass is identified as the likely method by which development in these areas might achieve the 20% target; the allocation and deliverability of these sites is questioned. But the on site provision in the Western Fringe is deliverable as part of housing proposals and is sustainable in the long term.	The Energy Study states there is currently very little resource for biomass but states that this is not a limiting factor as there is great potential to import from outside the Borough. The study identifies the north west and the east fringes as having the potential to incorporate biomass and/or heating networks. This is not a requirement; it would be for the developer to determine the most appropriate type of on site provision.	No change proposed

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024/06/CS3/1	St Modwen Developments Limited	Support the recognition that feasibility and viability play in the provision of on site renewables. Note that the 10% target is in line with Government policy but it is not clear how the 20% target has been determined or why these locations should be capable of higher provision.	See response to 002/02/CS3/123 above.	Amend para 3.3.7 to justify the 20% target. New - Not in CD009.
024/06/CS3/1	St Modwen Developments Limited	It is unclear what target is to be used for major developments within strategic locations.	The 20% target will be applied to the whole strategic location and not to each development within it.	Amend CS3 and para 3.3.7 to clarify. New - Not in CD009.
027/06/CS3/2	Miller Group	Energy efficient development should be promoted rather than requiring energy generation as technologies can be inappropriate, ineffective and have maintenance issues. Reference to 20% should be deleted.	CS2 promotes energy efficient development. Renewable energy is complementary to this and is required to help deliver the higher Code for Sustainable Homes and BREEAM targets.	No change proposed
CS4				
010/03/CS4/3	Northumbrian Water Ltd	Support and, particularly, seek the retention of point 8 in the final, adopted Core Strategy	Subject to examination the Council proposes to retain CS4 in its published form.	No change proposed.
017/02/CH3/*	English Heritage	Development should make a meaningful and proportionate contribution to the wellbeing and upkeep of the townscape and heritage assets. Securing developer contributions towards the safeguarding and repair of heritage assets is legitimate and should be included in CS4 and guidance on Planning Obligations and CIL.	Heritage assets will be protected and enhanced through the development management process. It is not feasible or appropriate to list every potential planning obligation matter in CS4; it states that planning obligations are 'not limited to' the list in 1-12 so where appropriate planning obligations/CIL could be secured for heritage assets.	No change proposed.
018/03/CS4/123	Durham Constabulary	CS4 should identify the emergency services as a key public service provider to enable the Police to seek Developer Contributions where viable and appropriate to assist in delivering a	It is important that all new development is supported by appropriate infrastructure provision. The police acknowledge that new infrastructure will not be required for all new development. So it is considered appropriate to discuss this matter on a site by site	No change proposed.

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		<p>suitable and effective service. Without full identification of the emergency services within the definitions of community or social infrastructure CS4 does not provide the most appropriate strategy to delivering sustainable communities.</p> <p>It is accepted that not all growth will precipitate the need for additional police infrastructure but there is a need to support a police presence where it is needed and not necessarily where it has historically been located.</p>	<p>basis. It would still be feasible to secure contributions through CS4; the policy states that planning obligations are 'not limited to' the list in 1-12 so where appropriate planning obligations/CIL could be secured for police infrastructure.</p>	
024/07/CS4/S	St Modwen Developments Limited	<p>Pleased that CS4 acknowledges that viability and abnormal costs should be taken into account when negotiating planning obligations and usefully sets out what may be sought. This should not represent a shopping list and infrastructure requirements should be balanced accordingly.</p>	<p>Developer contributions can be secured for a wide range of matters to help ensure that new development is supported by appropriate infrastructure provision. It is not feasible or appropriate to list every type of infrastructure in CS4; the policy states that planning obligations are 'not limited to' the list in 1-12 so where appropriate planning obligations/CIL could be secured for infrastructure.</p>	No change proposed.
027/07/CS4/1	Miller Group	<p>The use of a carbon management fund conflicts with the test of Circular 05/05. A definition of major development is required.</p>	<p>It is acknowledged that there will be exceptional circumstances where it is not feasible or practical to provide renewable energy on site. However the new development will still generate an impact which should be mitigated. A carbon management fund is considered to be consistent with Circular 05/05 and is seen as a legitimate approach to securing renewable energy provision if it cannot be secured on site. The Council's Statement of Community Involvement sets out the definition of major development.</p>	No change proposed
CS5				
002/04/CS5/S	Peacock and Smith for Bussey and Armstrong	<p>Support. Particularly welcomes identification of Faverdale as a key strategic location for business, industrial and logistics development</p>	Noted.	No change proposed.

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		within the Borough.		
007/02/CS5/S	England and Lyle for Ward Bros (Steel) and Baydale Properties	Support. Welcome recognition that existing employment sites will only be safeguarded if they are viable and it can be demonstrated that they are no longer required for the purposes of providing a balanced portfolio of land. Indicate that the Cleveland Street site is unviable, but that employment use could be part of some mixed-use redevelopment.	Noted. The land is being considered as an option for residential development through the Accommodating Growth Issues and Options Report.	No change proposed.
010/04/CS5/S	England and Lyle for Northumbrian Water Ltd.	Support CS5 and its associated objectives to support the Borough's local economy. Seek early liaison regarding any employment sites where alternative uses or mixed uses are being proposed.	Noted. NWL will continue to be consulted on the preparation of this and all other LDF documents.	No change proposed.
014/01/CS5/123	Halcrow for the Highways Agency	The evidence that employment development can be sustainably delivered without detrimentally impacting on the operation of the strategic road network is unsubstantiated.	See response to 014.03.CS19.123 under CS19 below.	Minor amendments to the Core Strategy are proposed to allow the withdrawal of the objection (see CD009).
015/01/CS5/S	Turley Ltd for the Warmfield Group (land interests at Faverdale)	Support the proposal for a strategic employment site at Faverdale. Evidence that this site is of regional importance for delivering regional growth was set out in the preparation of the now revoked RSS; that evidence is still relevant. The site's accessibility is unique. It is a sustainable and deliverable site, and will help deliver Core Strategy Objective 3.	Support welcomed, but clarify that the Core Strategy does not make any strategic allocations, only identifies broad locations for development. The allocation of sites will occur in the Accommodating Growth DPD.	No change proposed.
018/04/CS5/123	GVA Grimley for Durham Constabulary	New employment development has implications for both infrastructural and operational demand on the police. The Police need to be able to match their pattern of supply and growth to the	This representation does not seem to relate to the Publication Draft Core Strategy as it refers to 'forthcoming preferred options'. Durham Constabulary were consulted on the preparation of the Infrastructure Delivery Plan but did	No change proposed.

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		<p>growth locations of the forthcoming preferred options. Local policing support needs to be rationalised so that future local facilities, such as police stations, are located in relevant and sustainable locations that are best placed to serve the communities they serve.</p>	<p>not reply, and our current knowledge that they have no specific requirements for new policing facilities in Darlington in the plan period.</p> <p>The Council is happy to engage with the Police to help reserve land as part of development in the strategic locations if a specific need is identified. The Police should engage with the Council through future consultations on the Accommodating Growth DPD and any revision/update to the Infrastructure Delivery Plan.</p>	
020/01/CS5/12	GVA Grimley for Argon Faverdale Ltd and Spencer Industrial Estates (land interests at Faverdale Industrial Estate)	<p>Land at Faverdale has become unviable for employment uses and should be reallocated for residential-led mixed-use development, with possibly an element of office development. Contrary to the unjustified statements in the Employment Land Review, the site could be suitable for housing and is not isolated, and there is evidence of house builder interest should the land become available for housing.</p> <p>The appropriateness and mechanisms for the review and the release of employment land for alternative uses which meet wider policy aims based on employment evidence base information in the context of Policy CS5: Supporting the Local Economy. Suggests that amendment be made to CS5 to protect existing employment sites unless it can be demonstrated through the Accommodating Growth DPD or through a planning application that they are not required for the purposes of providing a balanced portfolio of land for employment purposes.</p>	<p>The Core Strategy does not make any allocations – it only identifies strategic locations. Land allocations will be made through the Accommodating Growth DPD. The protection of existing developed employment areas will take place through the Making Places DPD. However, CS5 does provide the flexibility to allow for the release of employment land where it is not considered that they will be required for the purposes of providing a balanced portfolio of land for employment purposes. It is proposed to include a policy setting out the mechanism in the Making Places DPD.</p> <p>The commentary on Faverdale Industrial Estate in the Employment Land Review is for the whole extent of the estate, and as such is only meant to be interpreted at that strategic spatial scale.</p> <p>The views on market demand in the ELR can only be a snapshot. Whilst accepting that market conditions may have worsened since the ELR was prepared as the Core Strategy plans for 15 years ahead, regard has to be had for the likely market conditions across the whole of the plan period, rather than planning on the basis of market conditions that have manifest themselves very recently and are unlikely to endure much beyond the initial years of the plan period.</p>	No change proposed.

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		<p>The Core Strategy and its evidence base fails to appropriately reflect the currently low and likely continuing sluggish commercial market (national data and forecasts are provided to evidence this, and local evidence of supply outstripping demand). It also fails to reflect appropriately how existing employment provision relates to this demand in specific areas.</p> <p>The Employment Land Review (ELR) commentary on demand and desirability of some existing employment land seems optimistic given wider market conditions.</p> <p>Restricting uses to B1, B2 and B8 at Faverdale Industrial Estate is inappropriate given current market conditions; alternative uses at peripheral locations should be investigated.</p> <p>The commentary of the ELR as regards Faverdale Industrial Estate is not justified, e.g. 'too isolated' and <i>'the exclusive industrial nature of the area does not lend itself to any other uses such as mixed-use or residential'</i> (p116) and that the <i>'Site is not suitable for housing'</i>.</p> <p>The commentary about Faverdale Industrial Estate is contradictory, e.g. it is <i>'rather isolated to be considered for any other use.'</i> (p116), and 'it has excellent proximity to both roads and</p>		

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		<p>public transport' and scores highly on sustainability.</p> <p>Propose an amendment to the Policy.</p>		
020/01/CS5/12	GVA Grimley for Argon Faverdale Ltd and Spencer Industrial Estates (land interests at Faverdale Industrial Estate)	<p>Concerned about the scale of new employment land allocations, which is in addition to existing sites. The amount of land to be allocated for employment (235ha) is over twice the predicted requirement (101ha). The Core Strategy should allow for a spatially planned reduction in employment provision, by providing for employment sites to be reallocated through the subsequent Accommodating Growth DPD.</p>	<p>The amount of new land to be allocated is to ensure that there is a range and choice for sites for those seeking employment land in the Borough, whatever their needs and employment sector. Many of the proposed locations are complementary, rather than competitor locations.</p> <p>ELR and the Gateway Study provide the evidence of need. The ELR and the Core Strategy make it clear that not all the employment land proposed will be suitable for all types of employment – Policy CS5 identifies the type of employment that is appropriate in each general location. Further detail would be given in the preparation of the Accommodating Growth DPD.</p> <p>The last paragraph of Policy CS5 sets out the circumstances under which existing employment sites could come forward for other purposes. This provides flexibility in appropriate circumstances.</p>	No change proposed.
020/01/CS5/12	GVA Grimley for Argon Faverdale Ltd and Spencer Industrial Estates (land interests at Faverdale Industrial Estate)	<p>Question how high levels of allocation of new employment land will impact on existing employment areas. Availability of new sites are likely to be more attractive to occupiers than investing in deteriorating areas such as Faverdale Industrial Estate, further undermining their ability to attract market interest. The additional employment land proposed will be sufficient to provide a balanced portfolio for employment purposes. Therefore alternative uses should be considered for existing employment land, which will be surplus to needs.</p>	<p>Not all potential occupiers are looking for the best employment locations – some will be driven by price, and it could be the role of existing areas such as this land at Faverdale Industrial Estate to meet the needs of those happy to occupy below premium employment land for below premium prices.</p>	No change proposed.
020/01/CS5/12	GVA Grimley for	More information is needed on the	It is proposed to include a policy setting out the	No change proposed.

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	Argon Faverdale Ltd and Spencer Industrial Estates (land interests at Faverdale Industrial Estate)	mechanism by which sites could be released from employment use on viability grounds. Suggest this should be done in preparing the Accommodating Growth DPD or in preparing planning applications.	mechanism in the Making Places DPD.	
024/08/CS5/12	Barton Willmore for St. Modwen Developments Ltd (land interests in former Corus land at Faverdale and Whessoe Road)	The 360ha of additional employment land proposed is potentially too much, at three times the identified need. This is the same figure that appeared in the revoked RSS, and should not be relied upon. Suggest the independent review, which was carried out as part of the ELR, and which came up with a need for an additional 101ha, should be used as the basis for employment land planning in Darlington instead.	The amount of new land to be allocated is to ensure that there is a range and choice of sites for those seeking employment land in the Borough throughout the plan period, whatever their needs and employment sector. Many of the proposed locations are complementary, rather than competitor locations, and it is not envisaged that the whole portfolio will be developed within the plan period. Also, the existing portfolio is mostly made up of small pockets within existing employment areas, only suitable for limited range of employment uses. The figure of 360ha is a ceiling and not a target of provision.	No change proposed.
024/08/CS5/12	Barton Willmore for St. Modwen Developments Ltd (land interests in former Corus land at Faverdale and Whessoe Road)	The regional assumptions about the amount of employment land to be provided has not been justified and the evidence base for this policy needs to be revisited and amended before the Core Strategy is examined.	The figure provided for employment land provision is a ceiling and not a target. The policy takes account of Darlington's distinctive nature of provision whereby the vast majority of employment land available consists of existing pockets within existing sites and other mixed use and employment areas. The purpose of providing a potential supply over and above that estimated in more recent studies is to meet the aspirations for the Council in terms of growth and employment, and also to provide a flexible and varied land supply for employment purposes over the plan period.	No change proposed.
027/08/CS5/2	Pegasus Planning Group for Miller Homes (land interests at Faverdale)	Not sound and not effective. Insufficient emphasis on the Key Employment Site at Faverdale. Specific reference should be made to 120ha of employment land at Faverdale, which can be developed at any point during the plan period with potential for distribution and logistics.	Policy CS5 already indicates that 125ha will be made available at Heighington Lane. Clarification of the amount of land to be identified at each of Faverdale and Heighington Lane key employment locations is suggested to Policy CS5, and these reflect the recommendations of the Council's Employment Land Review 2009(SD017). Paragraph 4.1.6 also indicates that Faverdale can meet the needs of larger industrial uses and logistics.	Propose amendment to Policy CS5 as follows (amendment in bold); '...A further 125ha of employment land will be made available at the key employment locations of Faverdale

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				(about 120ha) and Heighingotn Lane (about 5ha), for development.....'
CS6				
004/01	Theatres Trust	Support for Core Strategy, particularly for Policy CS6	Noted	No change proposed.
017/03	English Heritage	The historic environment is now more fully acknowledged in Policy CS6 in line with Policy HE3.1 of PPS5	Noted	No change proposed.
018/05	Durham Constabulary	Generally support the improvement and development of existing and additional tourist facilities. At a planning policy level we would request that consideration could be given to the implication of increasing numbers of visitors will have on the localities in terms of the demand on policing including security, road management, crime, anti-social behaviour, local policing, and organised crime.	It is for Durham Constabulary to advise on these implications and suggest mitigation measures. Durham Constabulary were consulted on the preparation of the Infrastructure Delivery Plan but did not reply. The Police should engage with the Council through future consultations on the Accommodating Growth DPD and any revision/update to the Infrastructure Delivery Plan.	No change proposed.
026/02	Dobbies Garden Centre	We note that the reference to promoting a strategic tourism opportunity adjoining the A68/A1(M) interchange has now been removed from Policy CS6 to acknowledge that there is no commitment from any party to deliver it. Notwithstanding this, it is considered that a Dobbies Garden World in this location (the North West Urban Fringe) would complement the previous aspiration for a tourism development in this area and would accord with the wider aims of Policy CS6. It is requested that this be acknowledged within the Local Development Framework policy.	One of the reasons for removing the reference to a strategic tourism opportunity in this location was that no work had been undertaken to define the concept and justify a strategic tourism opportunity in this location. It was impossible to undertake a sequential test (or decide if one was necessary) and there were question marks over the sustainability of encouraging, mainly, car-borne trips to this location. Therefore, it was decided to remove the reference from the Policy.	No change proposed.

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027/09	Miller Group	It is noted that Policy CS6 does now not refer to a strategic tourism opportunity around the A68/A1(M). The reference should be maintained as it seeks to maximise opportunities for tourism within Darlington Borough.	As 026.02, above.	No change proposed.
CS7				
Para. 5.0.6				
012.01.CH5.1	Sainsbury's Supermarkets Ltd	Unsound: not justified. No evidence that the expansion of range of goods in supermarkets has affected the health of Darlington town centre.	Paragraph 5.0.6 is justified by a robust and credible evidence base, in the form of the Darlington Retail Study 2008.	None
Para. 5.1.2				
021.01.CH5.1	Nottinghamshire CC Pension Fund	Unsound: not justified. Should consider alternative options to the Oval to meet the identified immediate quantitative need for comparison floorspace, such as expanding existing district centre boundaries.	Paragraph 5.1.2 is founded on robust and credible evidence and explains some of the background for formulating the most appropriate strategy, in policies CS7 and CS8. The Core Strategy is also not the document for reviewing the detailed boundaries of centres. Moreover, simply expanding a boundary would not in itself meet a need.	None
Para. 5.1.5				
021.02.CH5.1	Nottinghamshire CC Pension Fund	Unsound: not justified. Does not take into consideration the important role of existing edge-of-centre retail locations or the expansion of edge-of-centre sites (including near district centres) for retailing and not purely non-retail purposes.	The representation appears to misunderstand the purpose of paragraph 5.1.5 and does not explain why it is considered to be unjustified. The situation for retail uses is dealt with in other paragraphs but it is not expected that the town centre will need to be expanded during the plan period for retail purposes, and certainly not that sites on the edge of district centres would have a role to play if such a situation did arise.	None
CS7				
019.02.CS7	Sport England	Support. But clarification is needed as to which type of intensive use sport and recreation facilities this policy is	Support noted and welcomed.	Clarification can be provided by proposed minor amendments (see CD009)

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		intended to cover, and how this relates to the hierarchy of facilities which CS18 seeks to establish and develop.		
012.02.CS7.123	Sainsbury's Supermarkets Ltd	<p>Unsound: all 3 elements. Insufficient flexibility in proposing priority developments. No strategy for where and by whom the first/initial developments will be delivered. No evidence of an agreement between agencies/land owners /partners capable of delivering Town Centre Fringe extension. No contingency should the first/initial priorities not come forward. Should be amended: - to refer to 'a priority' rather than 'the priority', to improve flexibility and support for economic growth; and, - by deleting the last two sentences (relating to the initial priority direction being eastwards) as there is no strategy for delivering this and the wording could prevent other town centre fringe development coming forward.</p>	<p>CS7 is justified, as it is in pursuit of the most appropriate strategy when considered against reasonable alternatives; effective, in that it is expected to be deliverable, is flexible and is able to be monitored; and is consistent with national policy, in particular with PPS4 and PPS12. The priority areas are not inflexible but indicative of where the Council's (and its partners') efforts for the delivery of the additional main town centre uses will be primarily directed as they appear to offer the greatest opportunities and benefits. They do not preclude other sites being brought forward through the planning application process.</p>	None
018.06.CS7.123	Durham Constabulary	<p>Unsound: all 3 elements. The expansion of retail and leisure facilities in the town centre may require more police infrastructure (eg. office space within a retail scheme/public offices, or a 'one stop shop' facility shared with other public services).</p>	<p>The representation appears to misunderstand the purpose of CS7 and does not explain how it is not justified, effective or consistent with national policy. As with other services and facilities that are intended to be visited by members of the public, relevant police infrastructure should be located in the town, district and local centres which are best suited to the catchments they will serve. The detailed means of providing such infrastructure, or other resources for policing, are not matters for Policy CS7.</p>	None
CS8				
018.06.CS7.123	Durham	AS FOR CS7 ABOVE	AS FOR CS7 ABOVE	None

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	Constabulary			
012.03.CS8.123	Sainsbury's Supermarkets Ltd	Unsound: all 3 elements. The inclusion of figures, forecasts and limitations on additional retail provision is overly restrictive and insufficiently flexible. Should be replaced with outlines of the broad patterns of future retail development, with a caveat that retail capacity will be reviewed on a regular basis.	CS8 is justified, as it is based on robust and credible evidence and is in pursuit of the most appropriate strategy when considered against reasonable alternatives; effective, in that it is expected to deliverable, is flexible and is able to be monitored; and is consistent with national policy, in particular with PPS4. The floorspace forecasts are far from inflexible as can be seen from the phrasing "could be needed", "expected to be needed" and "could be required". The only forecast not couched in such terms is the start of the third paragraph which states that: "There is no quantitative need for additional convenience retail floorspace in the Borough before 2021" and that is based on the evidence of the Darlington Retail Study 2010 Update. Capacity forecasts are, of course, indicative and not prescriptive and the evidence base will be regularly updated and CS8 itself reviewed as necessary. In the case of the third paragraph the quantitative forecast demonstrates that the LDF does not need to allocate sites to meet convenience floorspace need over at least the next five years (see PPS4 Policy EC5.5). Moreover, the forecasts do not preclude additional convenience floorspace coming forward at any time where it can be justified.	None
CS10				
6.1.1				
024/09/CS10/1	Barton Willmore for St Modwen.	Population growth, including as a result of the increase in single person households and an ageing population, should be recognised as an important factor in planning for housing in Darlington.	The issues set out in para. 6.1.1 are the outcomes of population change, the nature of the housing stock and the interrelationship between these two, so it would be incongruous to refer to population growth as a separate specific issue here. Population growth is recognised as an important	Propose no change.

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			<p>factor in planning for housing in Darlington in the Core Strategy; it underpins the Spatial Vision (see para 2.26), and background documents (RSS technical papers (SD005, SD006) provide details of the forecasts. Population growth is primarily linked to economic growth in Darlington; young and working age people will only choose to stay in or migrate into Darlington if suitable employment opportunities and housing are available. Population growth is therefore an implicit consequence of issue (ii) 'retaining and attracting more young and working age people....',.</p> <p>Furthermore, an ageing population and an increase in single person households are issues that planned housing provision addresses, but are not necessarily linked to population growth.</p>	
6.1.5				
016/03/CH6/123	Smiths Gore for Durham Cathedral	<p>Not justified, effective or consistent with national policy.</p> <p>Consider it premature to specifically define the phasing of development sites, as there is insufficient evidence at this time to accurately inform it. The phasing in the Core Strategy does not allow sufficient flexibility for the Accommodating Growth DPD to accurately and comprehensively assess the merits of each of the sites. Seek removal of reference to phasing.</p>	<p>It is a key role of the Core Strategy to set out broadly how much, where and when new development will take place. Phasing is key to ensuring that the delivery of development and accompanying infrastructure is coordinated. The Core Strategy phasing is for each of the broad locations, and not for specific sites; that detail will be in the Accommodating Growth DPD.</p> <p>The evidence collected so far, as set out in the background documents, is considered appropriate for a Core Strategy; more detailed information will inform the allocation and detailed phasing of sites through the Accommodating Growth DPD.</p> <p>The number of new dwellings set out for locations (a) to (d) are approximate to the nearest 50. Additional flexibility and clarity could be introduced, by the addition in Policy CS10, of the word 'about' in the tables setting out the amount and phasing of development at locations (a) to (d). However, it is considered that there is sufficient flexibility in the policy as regards phasing. There is a clause in Policy</p>	<p>Propose change to CS10 as follows:</p> <p>Insert the word 'about' in the title heading of the table setting out the amount and phasing of development at locations (a) to (d).</p> <p>New – not in CD009</p>

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			CS10 (beginning 'where the strategy outlined above....') that allows sufficient flexibility.	
6.1.8				
016/04/CH6/12	Smiths Gore for Durham Cathedral	<p>Support references to development at Eastern Urban Fringe (EUF) representing the first phase of development. However, the CS is not sufficiently flexible to allow for the deliverability of future development at the EUF to be considered in its entirety.</p> <p>Also the sequential preference of the North West Urban Fringe (NWUF) and EUF sites is not fully justified. This should be the role of the Accommodating Growth DPD</p>	<p>There is a clause in Policy CS10 (beginning 'where the strategy outlined above....') that allows sufficient flexibility.</p> <p>Paragraph 6.1.8 indicates clearly that further development is envisaged at the Eastern Urban Fringe beyond the Core Strategy plan period. This should provide the certainty to ensure comprehensive development at the EUF in the longer term.</p> <p>The strategic housing options appraisal (SD003) clearly found the southern part of the North Eastern Urban Fringe to be more suitable than the northern part, and as a consequence, it is this southern part that now identified as the housing part of the Eastern Urban Fringe location (see key diagram).</p> <p>Para. 6.1.5 and Policy CS10 both make it clear that the Core Strategy is concerned with broad strategic locations, and not specific sites, and so is appropriate in the Core Strategy rather than the Accommodating Growth DPD. The sequential preference of the NWUF location over the EUF location is directly drawn from consideration of the each of the broad locations against each of the criteria set out in the options appraisal (SD003). By setting out the findings for each location against a range of factors, the options appraisal is considered transparent and fully justified, at the level appropriate to the consideration of broad locations for the Core Strategy.</p> <p>Specifically, as examples, for factor 4, the NWUF is easy to link to existing walking and cycling routes, whereas the EUF only has the potential and that could be difficult to implement because of costs associated with crossing areas liable to flood. Considering the merits of the locations against factor 4, the NWUF has a pub and local centre nearby, and existing and planned workplaces nearby, whereas at the EUF,</p>	No change proposed.

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			there are no existing pubs or local centre services against factor 5.	
6.1.11				
016/05/CH6/123	Smiths Gore for Durham Cathedral	Not justified, effective or consistent with national policy. Land supply should not be constrained by inflexible policies in the CS. Support the paragraph, but suggest the mechanism for review and delivery of housing sites should be more specific and in accordance with the interventions set out in the Housing Implementation Strategy.	Support noted. Paragraph 6.1.1 outlines the approach to address non delivery in general, and is set out more precisely in Policy CS10 in the paragraphs beginning 'where housing development does not come forward as envisaged' and 'where the strategy above is delivering 80% or less....' If the circumstances of non delivery indicated in Policy CS10 arise, it could allow housing in locations phased for later in the plan period to be brought forward earlier. If there is any discontinuity between the Housing Implementation Strategy (SD004) and the Core Strategy, the Core Strategy prevails.	No change proposed.
6.1.12				
017/04/CH6/*	English Heritage	Re-word so that the highest appropriate density developments will be expected in the most accessible locations, thereby acknowledging the need to safeguard local distinctiveness, and better reflect the government's abandonment of the minimum density requirement of 30 dwellings per hectare.	This suggested change is not needed. Appropriate density of development is covered by Policy CS2, together with the Design of New Development SPD or any successor.	Propose no change.
CS10				
010/05/CS10/S	England and Lyle for Northumbrian Water	Legally compliant and sound. Support prioritised strategic locations. Essential that NWL is consulted early in the future consideration of allocations.	Noted. NWL are a key consultee at all stages of plan making process	Propose no change
011/02/CS10/1	Barton Willmore for The Church Commissioners for England	Not justified. Object to the strategic housing locations identified, primarily the identification of the North West Urban Fringe as a suitable location. Consider that land at Hall Farm should be included in the North West Urban Fringe strategic location. Constraints	The area indicated on the Key Diagram is indicative and does not equate to specific sites; it indicates a location for strategic development, as required by para. 4.1(3) of PPS12. The developable part of Hall Farm is isolated from other parcels of land that could add up to a	Propose no change

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		<p>identified for the site in the SHLAA can be overcome, and that the constraints identified for Hall Farm are very similar to those on sites that have been identified as within the North West Urban Fringe strategic location.</p>	<p>developable strategic housing location. In early work on identifying and assessing strategic locations, it was included in the Western Urban Fringe, but the gap created by Staindrop Road, Cocker Beck and the associated flood risk area, together with their relationships to very different parts of the urban area, meant the originally conceived Western Urban Edge could not be considered as a meaningful whole, and was replaced by consideration of the Western Urban Fringe location.</p> <p>The Barnard Castle Trackbed and the relationship of land at Hall Farm to a different part of the urban area to land to the north precluded it from being considered as part of the North West Urban Fringe.</p> <p>Land at Hall Farm has insufficient development capacity to be considered a strategic location in its own right; whilst SHLAA work (SD012) indicates the land has capacity for 416 dwellings, this is derived from standard formulae, and does not reflect the constraints that have been identified for the site, for example, the flood zone mentioned above and the need for a landscaping buffer along the western edge to mitigating the impact of noise from the A1(M).</p>	
016/06/CS10/123	Smiths Gore for Durham Cathedral	<p>General direction of policy welcomed, but inappropriate to specify a priority for delivery (order and timing). Also object to specific allocation of a fixed number of units in Policy CS10. Premature to impose housing figures on each site. Suggest removal of imposed housing figures in Policy CS10.</p>	<p>Support welcomed. Regarding inclusion of sequence and phasing, see initial response to 016/03/CH6/123 above.</p> <p>CS10 does not allocate housing on sites – it identifies the approximate number of dwellings to be provided in broad locations, as appropriate to a strategy document.</p>	Propose no change

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018/08/CS10/123	GVA Grimley for Durham Constabulary	<p>Creation of vibrant communities needs appropriate levels of policing. Need to support crime reduction across the County.</p> <p>Would support the introduction of additional executive housing within the County to diversity the mix, type and size of properties. It would benefit the Police directly through increased revenue created from Council Tax receipts.</p>	<p>This appears to be representation linked to CS11 and not CS10. See response to 018/08/CS11/123 below.</p>	<p>No change proposed.</p>
020/02/CS10/12	GVA Grimley for Argon Faverdale and Spencer Industrial Estates.	<p>Not justified or effective. A proportion of the short term shortfall caused by meeting Growth Point delivery and anticipated low completion rates should be met by identifying allocated sites through the development plan process, rather than relying on significant numbers coming through a contingency strategy. Clients' land at Faverdale should be considered as a part of a review of potential housing sites, by means of an update to the SHLAA.</p>	<p>The rates of housebuilding being proposed for years ahead are substantially lower than the RSS targets for last 7 years, but the targets from 2011 onwards are also lower, so the shortfall alluded to is not envisaged. Targets were set high in the initial years of the RSS plan period to reflect that there were a lot of schemes in the development pipeline, and to acknowledge that this wasn't sustainable over the longer term.</p> <p>Whilst the Tees Valley Housing Growth Point was awarded to deliver accelerated housing growth, since the economic downturn intervened, the programme is now about unlocking stalled sites and maintaining housing delivery rather than accelerated growth; therefore no additional dwellings are identified to deliver it. This less optimistic position was first set out at Revised Preferred Options stage in January 2010.</p> <p>The appropriate document for allocating sites is through the Accommodating Growth DPD, and any new sites proposed through that will be assessed to identify the most suitable, available and deliverable.</p>	<p>No change proposed.</p>
023/04/CS10/123	England and Lyle for the Manners Family Trust and Mr & Mrs Morgan	<p>Policy CS10 does not reflect the Council's consistent desire through the LDF process to deliver high housing numbers to support the Gateway growth agenda, nor the latest CLG household projections. Suggest uplifted</p>	<p>The Council has always sought to reflect RSS housing figures during LDF preparation, as the housing requirement for Darlington accorded with the amount it sought in its submissions to the RSS preparation process. See response to 024/09/CS10/1 below The Council's aspirations on housing numbers were</p>	<p>Proposed no change.</p>

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		<p>housing figures for each of the 5 year phases of the plan period, and how this would be reflected in the number of dwellings indicated at each strategic location and through an addition to CS10 that would allow additional housing capacity to be delivered through non strategic sites within and on the edge of the urban area and surrounding villages.</p>	<p>amended downwards at the Revised Preferred Options stage of Core Strategy preparation (Jan 2010). The amendment reflected the revised focus of Housing Growth Point from one of accelerating housing delivery to unlocking stalled sites. . The average annual net additions to the dwelling stock now outlined in CS10 e.g. about 350 from 2011-2016, are not precise, so this would allow for additional housebuilding if the market can deliver it in locations in accord with the locational strategy for new housing, expressed through Policy CS1 and CS10. The figures suggested by the representor do not seem to have any robust or credible evidence base; the basis seems to be a loose implied link to the latest CLG household projections.</p>	
023/05/CS10/123	England and Lyle for the Manners Family Trust and Mr & Mrs Morgan	<p>Challenge the content of the Council's strategic housing location options appraisal. Submit alternative conclusions against each of the factors used in the options appraisal for the North West Urban Fringe, North Eastern Fringe and Western Fringe.</p>	<p>The Council used consistent information from specialist sources and systematic desk top study to come to the conclusions in the options appraisal. Much of the information was drawn up by amalgamating information on specific sites surveyed for the SHLAA in coming to conclusions about general locations. Several infrastructure providers indicated they were unable to provide a view on anything other than specific sites. It is considered robust and credible for a strategic locations appraisal.</p>	Propose no change.
024/09/CS10/1	Barton Willmore for St Modwen.	<p>It should not automatically be assumed that it is appropriate to continue to plan for RSS housing targets; a growing population (as identified in the TVSHMA) suggests even greater housing numbers will be required. The figures should be reassessed and further research undertaken.</p>	<p>Prior to finalising the Publication Draft Core Strategy, the technical evidence underpinning the (former) RSS figures was reviewed and considered to still be relevant (SD005, SD006). The robustness of that evidence has already been tested, during the North East RSS Examination in Public in Spring 2006, and in the Inspector's consideration of representations made on behalf of local authorities to the Secretary of State's post examination Further Proposed Changes.</p> <p>Whilst the Council is aware of more recent population and household projections (some of which were included in the Tees Valley SHMA), it remains committed to contributing towards the regional</p>	Propose no change.

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			<p>economic growth target (2.8% average annual GVA growth rate) set out in the RSS, and the Regional Economic Strategy. As such, the housing requirement set out in the RSS seems the appropriate level of provision to plan for in the Core Strategy.</p> <p>Pragmatism was also a consideration. There is a need not to unduly delay preparation of the Core Strategy. Also, more recent population and household projections could be interpreted as indicating that even more new housing was needed over the plan period. Given continuing poor market conditions, it was not considered the right time to revise planned housing provision upwards. The approach taken by the Council does not preclude an uplift of planned provision as part of any review of the Core Strategy in the medium term, after the market has recovered and stabilised sufficiently to deliver at the level required to meet identified needs.</p>	
024/09/CS10/1	Barton Willmore for St Modwen.	Additional information is needed about each of the strategic locations, particularly the North West Urban Fringe, and the likely mix of uses, so that development is balanced and appropriately integrated.	<p>Policies CS1, CS5 and CS10 and the reasoned justification indicate the general location and amount and phasing of development proposed in each strategic location. The Key Diagram illustrates the general location of the North West Urban Fringe and symbols depict the general locations of housing and employment within it.</p> <p>This level of detail is considered appropriate to a Core Strategy. Further detail on specific sites and amount of development will be given in the Accommodating Growth DPD. This will consider issues of ensuring balanced development and integration of its elements with each other and with the existing adjoining urban area.</p>	Propose no change.
013/01/CS10/S	Persimmon Homes	Want some flexibility in the 'where delivery does not come forward as envisaged' approach, where it is proven that a five year supply of housing numbers isn't deliverable from existing commitments or the strategic	Flexibility is already provided by the penultimate paragraph of Policy CS10.	Propose no change.

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		sites. Suggest this could be by allowing applications to develop other housing allocations which are demonstrably deliverable at that time and which don't prejudice the prospects of implementing sites in the strategic locations identified.		
014/02/CS10/123	Halcrow from the Highways Agency	Unsound: all 3 elements. Policy is based on currently unsubstantiated evidence, which is still to demonstrate whether the development proposed in the Strategy can be sustainably delivered without detrimentally impacting on the operation of the strategic road network.	The Agency provided a subsequent Position Statement on 22nd October. This included further analysis and set out amended wording to the Core Strategy that if adopted would allow the Agency to withdraw its objection and consider the Core Strategy sound.	Minor amendments to the Core Strategy are proposed to allow the withdrawal of the objection (see CD009).
CS11 (means CS10?)				
028/02/CS11/2	Mrs Ord (resident)	Land at Woodburn Nursery (SHLAA site 50) may not be viable for new housing development, but would be preferable to unsustainable present uses. A greener use would be better; a focal greenspace for the community in this area is lacking. Neighbours must be consulted on any future redevelopment of the site, particularly as some adjacent buildings are listed.	The Core Strategy does not set out policies or proposals for specific sites; this will be done through a forthcoming Accommodating Growth DPD. Consultations on Issues and Options of that DPD are due to take place from November. These comments will be considered in preparing that document. Mrs Ord will also be added to the list of consultees.	Propose no change.

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CS11				
018/08/CS11/123	GVA Grimley for Durham Constabulary	Creation of vibrant communities needs appropriate levels of policing. Need to support crime reduction across the County. Would support the introduction of additional executive housing within the County to diversity the mix, type and size of properties. It would benefit the Police directly through increased revenue created from Council Tax receipts.	Note the support for increased levels of executive housing.	No change proposed.
023/06/CS11/S	England and Lyle for the Manners family Trust and Mr & Mrs Morgan	Consider policy sound. Land at the Western Urban Fringe would be suited to attracting individuals/families that can contribute most towards the economic health of the Borough. Flexibility is welcomed.	Noted. Appropriateness of Western Urban Fringe as a housing location is not relevant to this policy.	Propose no change.
024/010/CS11/1	Barton Willmore for St Modwen.	The affordable housing provision target of 30% is not robustly justified, as it is based on evidence of viability in only half of the Borough. Concern over the Council's interpretation of the economic viability study; it does not use the 30% in the context of specific sites at specific times, but to study areas over the plan period. Is 30% a robust and credible figure ?	The amount of affordable housing to be sought from eligible developments is <i>up to</i> 30%, and this is considered robust and credible. It acknowledges the economic viability study findings (SD007) that this level was only likely to be achievable in four out of the eight value areas and in the absence of significant adverse site specific issues. As such, it provides the necessary flexibility to secure lower levels of affordable housing outside of the achievable value areas, and/or where site specific issues render sites unviable at the 30% level of provision. An additional 'negotiation' clause that the representor refers to reiterates that. A similar 'up to' policy approach, underpinned by a very similar viability assessment, was adopted by South Kesteven District Council, and was accepted by the Inspector who examined that Core Strategy (report dated 8/6/2010). The Inspector considered the assessment to be credible, and the 'up to' policy	Propose no change.

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			<p>approach with a target that could be delivered on many sites, in most parts of the district even in low market conditions (para. 3.64 of that report refers), to be realistic.</p> <p>The Council's policy is also similar to one in Wakefield MBC's Core Strategy (CS6), which requires 30% affordable housing, with the figure being open to negotiation on a site by site basis. In a High Court Challenge, and subsequent Court of Appeal hearing, judges ruled that Wakefield Core Strategy policy must stand. It was considered that the 30% target was a realistic one in favourable conditions, and that it was justified, even though it was achievable in certain economic conditions.</p>	
013/01/CS11/S	Persimmon Homes	<p>If housing sites do not come forward because of viability, there should be flexibility within the approach to housing delivery to allow ready, available viable alternative sites to come forward to deliver the correct mix of units to ensure supply meets need.</p>	<p>This appears to be CS10 issue – see response to representation under that section.</p>	Propose no change.
017/04/CH6/*	English Heritage	<p>Policy does not make clear whether <i>'the conversion and adaptation of existing dwellings'</i> includes the conversion of buildings that are currently not in residential use.</p>	<p>New housing encompasses new dwellings created through the conversion of existing buildings.</p>	Propose no change.

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CS12				
018/08/CS12/123	GVA Grimley for Durham Constabulary	Creation of vibrant communities needs appropriate levels of policing. Need to support crime reduction across the County. Would support the introduction of additional executive housing within the County to diversity the mix, type and size of properties. It would benefit the Police directly through increased revenue created from Council Tax receipts.	This appears to be representation linked to CS11 and not CS12.	No change proposed.
CS13				
001/01/CS13/LC 123	Ward Hadaway for Mr W Cairney (resident)	The policy does not allow for the delivery of new windfall gypsy pitches on acceptable sites through planning applications/appeals. A policy reliant on allocation is illogical, and also, Circular 01/06 paragraphs 58 to 63 notes that windfall sites can contribute to the supply of gypsy sites.	This appears to be a misunderstanding as it is not the intention of the policy to put restrictions on the contribution of windfall sites to the provision of Gypsy and Traveller sites. The supporting text at Para. 6.4.3 also states (when referring to the criteria set out in the policy) ' <i>and will be applied in considering planning applications for the development of new sites</i> ', referring to the planning applications that are submitted for those sites that are not allocated through the Accommodating Growth Development Plan Document. A minor wording change can be implemented to clarify this point within the policy, however it is felt that the intentions of the policy are clear.	None.
001/01/CS13/LC 123	Ward Hadaway for Mr W Cairney (resident)	The requirement for 98 additional residential pitches to meet the needs identified in the Gypsy and Traveller Needs Assessment should be written into the Plan	It was decided at an early stage that the results of the TVGTAA, which were based on a ' <i>needs where it is seen to arise method of apportionment</i> ' across the study area, required supplementary work to achieve a fair, realistic and deliverable number of pitches to be provided over the plan period. This work is being undertaken, as part of the development of the options on the Accommodating	None.

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			Growth (Site Allocations) Development Plan Document, which is currently at Issues and Options stage. The actual minimum number of pitches to be provided, and the form of this provision, will be determined through this more detailed document, alongside the locations for this provision.	
008/02/CS13/1	Durham County Council.	Quantifiable data on present population and predicted growth might be better than proposed indicators.	This data would not be linked directly to how the implementation of the plan will be monitored. The monitoring of present population and predicted growth is carried out in background studies, the result of which, inform policy development. In this case, the relevant background study is the TVGTAA, which deals with predicted growth – please see response to 001 regarding the further work required to assist in the development of policy.	None.
008/02/CS13/1	Durham County Council.	The criteria for providing additional accommodation should be similar to that for other social groups. Flood risk should be considered.	The criteria are similar to those for other social groups, but also take into account the requirements of national planning policy, including flood risk (CS13(d)). Gypsies and travellers have been considered in the housing chapter of the document as they form part of communities as any other social groups do. A separate policy is present to reflect the separate planning rules at a national level pertaining to these groups.	None.
008/02/CS13/1	Durham County Council.	Various other comments.	All the comments not dealt with above refer to text in the CSRPO and not the Publication version of the document.	None.
CS14				
023/07/CS14/S	Manners Family Trust and Mr & Mrs Morgan	Consider CS14 is sound; the Western Urban Fringe will deliver a 'green corridor' with public access along the length of Baydale Beck between Staindrop Rd/Coniscliffe Rd adding to the open space network and environmental value of the town and local distinctiveness.	Noted	No change proposed

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CS15				
005/04/CS15/S	Environment Agency	Fully support the protection and enhancement of biodiversity, and CS15 in particular as being consistent with PPS25 and PPS9. Pleased to see the encouragement of strategic wildlife corridors alongside watercourses, the need to protect and improve watercourses, wetlands and buffer strips and the incorporation of integrated surface water management and flood storage.	Noted.	No change proposed
005/04/CS15/S	Environment Agency	Fully support Para 7.3.3 to identify land for development using a sequential approach, in accordance with PPS25. Recommend a minor amendment to Para 7.3.3 to remove the reference to flood zone 3b. This is functional flood plain, and no development would be acceptable in this location. Consistent with PPS25, fully support Para 7.3.4 that more vulnerable uses will be located outside of high flood risk zones, and that such uses will only be considered in zones at high flood risk where the Sequential and Exception Tests have been passed.	The Sequential and Exception Tests will be used appropriately to allocate land for development. Only water compatible uses will be appropriate in FZ3b; essential infrastructure must meet the requirements of the Exception Test.	Amend Para 7.3.3 as suggested.
CS16				
005/04/CS16/S	Environment Agency	Support CS16, and the requirement for development to take account of national flood risk policy. Pleased to see that new development will be directed towards FZ1 in accordance with Darlington's SFRA, and that	Noted.	No change proposed

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		proposals for development in higher flood risk zones will only be considered where the Sequential and Exception Tests have been passed. Fully support the SFRA and the Core Strategy Sequential Test which should also be used to guide new development, and consider that the approach is consistent with PPS25.		
005/04/CS16/S	Environment Agency	Support the requirements for mitigation measures to be set out in a strategic flood risk management scheme for the Town Centre Fringe particularly the requirements for compensatory storage, restoration of the natural floodplain and flood resilience and resistance and the creation of a green corridor along the River Skerne.	Noted.	No change proposed
005/04/CS16/S	Environment Agency	Support the requirements for proposals to take account of national standards on contaminated land and water quality, in accordance with PPS23 and the Water Frameworks Directive.	Noted.	No change proposed
010/06/CS16/S	Northumbrian Water Ltd	Support CS16 and particularly seek retention of (b) areas at risk from surface water run off, groundwater, mine water and sewer Flooding"; and, "the creation of a green corridor next to the River Skerne" in the final, adopted version of the Core Strategy. Para 7.3.5 should also be retained.	Subject to examination the Council proposes to retain CS16 and its supporting text in its published form.	No change proposed
CS17				
010/07/CS17/S	Northumbrian Water Ltd	Support the final paragraph of CS17 which to ensure the soundness of the Core Strategy must be retained in the final, adopted Core Strategy.	Subject to examination, the Council proposes to retain CS17 in its published form.	No change proposed

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017/06/CS17/*	English Heritage	Para 8.1.2 and CS17 make welcome reference to the relationship between Green Infrastructure and the Borough's heritage assets.	Noted.	No change proposed
019/03/CS17/*	Sport England	Support and welcome recognition of the role that the Green Infrastructure Network is able to play in meeting the formal and informal recreational needs of the community	Noted.	No change proposed
CS18				
019/04/CS18/*	Sport England	CS18 succinctly brings together the overarching spatial planning recommendations of the Playing Pitch Strategy and Sport and Recreation Facilities Strategy in a way which; <ul style="list-style-type: none"> - seeks to preserve and enhance existing facilities, - guides future investment in built and pitch facilities in accordance with a preferred hierarchy of provision. - Meets the requirements of PPG17 CS18 is backed by indicators which will accurately allow the success of the policy to be measured on an annual basis.	Support welcome and noted.	No change proposed
CS 19				
007.04.CS19.S	Ward Bros (Steel) Ltd & Baydale Properties	Support not safeguarding land for the Cross Town Route.	Support noted and welcomed.	None
014.03.CS19.123	Highways Agency	Unsound: all 3 elements. Policy is based on currently unsubstantiated evidence, which is still to demonstrate whether the	The Agency provided a subsequent Position Statement on 22nd October. This included further analysis and set out amended wording to the Core Strategy that if adopted would allow the Agency to	Minor amendments to the Core Strategy are proposed to allow the withdrawal of the

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		development proposed in the Strategy can be sustainably delivered without detrimentally impacting on the operation of the strategic road network.	withdraw its objection and consider the Core Strategy sound.	objection (see CD009).
018.11.CS19.123	Durham Constabulary	Unsound: all 3 elements. All members of the community should have access to local policing support. Acknowledgment of this and the need to rationalise and improve existing [police] infrastructure is necessary.	The representation appears to misunderstand the purpose of CS19 and does not explain how it is not justified, effective or consistent with national policy. CS19, in particular part (g), is concerned with improving accessibility to a wide range of widely used facilities, such as schools and shops. Police 'support facilities', such as police stations and neighbourhood offices, are unlikely to receive personal visits from members of the public in such numbers as to warrant being specifically named in CS19(g). The rationalisation and improvement of police infrastructure is not a matter for CS19.	None
Key Diagram				
027/11/Key/2	Pegasus Planning Group for Miller Homes Limited North East	Symbol for key employment location at Faverdale should be moved slightly.	Key diagram is only illustrative, and symbols only indicate general locations.	Propose no change.