

Lucy Mo  
LDF Programme Officer  
Town Hall  
Darlington  
DL1 5QT

**BY POST AND EMAIL**

19015/A3/DH/JP/ac

20<sup>th</sup> December 2010

Dear Ms Mo,

**DARLINGTON CORE STRATEGY: EXAMINATION IN PUBLIC  
REPRESENTATIONS ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND**

Further to receipt of the Examination Agenda including the matters and issues for discussion, we write with regard to the above on behalf of our client the Church Commissioners for England (referred to as the Commissioners), further to representations made to the Darlington Borough Core Strategy: Publication Draft.

Our previous representations related primarily to the Broad Location for future housing provision proposed to the north west of Darlington within the Core Strategy. The Commissioners own Hall Farm, which is located to the west of Darlington and abuts the edge of the built up area of the town, immediately adjoining the North West Urban Fringe (Policies CS1 and CS10), as identified on the Publication Draft Core Strategy Key Diagram.

For clarification, whilst our previous representations do not object to this broad location for growth, or for that matter the land currently included within it, our position is that our client's land should also be included within the North West Urban Fringe broad location, for reasons set out within our previous representations. The site was considered through the Council's SHLAA, and whilst it is acknowledged that Hall Farm is subject to a number of constraints, these are not considered to be materially different to those constraints that affect the three greenfield sites identified for new housing within the North West Urban Fringe, namely Stag House Farm (SHLAA Site 54), West Park (SHLAA Site 22) and land north of Faverdale (SHLAA Site 75). These and Hall Farm (SHLAA Site 14) are identified on the enclosed plan, which is an extract from the Darlington SHLAA Autumn 2009.

In order to meet the requirements of paragraph 4.46 of PPS12, as echoed by the Inspector's Question 5 for Matter 1: Strategy, extending the area of the North West Urban Fringe to include my client's site will ensure that the Plan is able to be effective in response to changing circumstances without relying on a review of the Core Strategy. Subsequent site allocations within the Accommodating Growth DPD would be unnecessarily constrained by an inflexible area of search which would prevent an alternative strategy from being adopted to consider other potentially suitable sites in the same general location, should the need arise.



In conclusion, we consider that in order to be found sound, the Core Strategy should be, *inter alia*, effective, in that the document is flexible as set out at paragraph 4.52 of PPS12. For the Core Strategy to be sufficiently flexible, we would request that the Inspector amends the Key Diagram to enlarge the North West Urban Fringe as indicated on the Key Diagram so that it extends further south to include our client's land at Hall Farm, as outlined on the attached plan.

In light of the above, the Commissioners do not wish to attend the Examination and we would therefore respectfully request that the Inspector relies on this letter and the previous representations made on behalf of our client to the Publication Draft Core Strategy.

We trust that you will take our representations will be fully taken into account as part of the consideration of the Core Strategy during the Examination and subsequently in preparing his report. In the mean time if you have any questions about the above please do not hesitate to contact me.

Yours sincerely,



**DAN HATCHER**  
Associate

Enc

cc Joanna Loxton - Church Commissioners for England