Representor 023, England & Lyle

Submitted 09/02/11

Reference number: CD043

I have no particular comments to make on the proposed amendments to the Core Strategy. None materially address our original representations or those matters we highlighted as part of the Matter 1 Examination session.

It was however my understanding that during this session the Inspector had requested, and the Council had agreed to provide, a paper providing more explanation of the sustainability factors behind their judgment that the strategic greenfield housing sites to the North West and North East fringes of the urban area represented the most appropriate and sustainable locations for such development (in line with PPS12) area rather than say our client's site at Coniscliffe Grange Farm on the Western Fringe of Darlington. The Inspector particularly sought further explanation on the North East Fringe strategic allocation bearing in mind it forms part of a much large 'allocation' scheduled for delivery post 2026.

Such an explanation is essential to understanding the Core Strategy and necessary because of apparent changes in the apparent sustainability of the Council's preferred sites as outlined in the recent Making Places and Accommodating Growth DPD MPAG DPD is based on more up to date information, including views of landowners. (compared to the 2009 Sustainability Appraisal) and calls into question the ability of these sites to actually deliver on key sustainability, social and planning criteria and core strategy policies/objectives e.g. the required percentage of affordable housing and the required percentage of renewable energy generation on site.

The key point being, as I raised at the Examination Session, that if it is now considered likely, as detailed in the MPAG DPD, that the Council's preferred sites cannot for viability reasons deliver on key sustainability & social aspirations and core strategy polices/objectives, that were central to the Council's original judgment on their sustainability and therefore their 'allocation' in the Submission Draft Core Strategy, this calls into question the whole basis for their 'allocation' in the Core Strategy.

In such circumstances the Council must surely be required to re-assess the comparative sustainability of all the competing strategic greenfield sites originally identified in the light of this information before any such allocations are confirmed in an adopted Core Strategy to identify which options are now the most sustainable. Such a process may well lead to a different conclusion such as the identification of my client's land at Coniscliffe Grange Farm (Western Fringe) as the most sustainable and deliverable strategic greenfield option available because unlike the others it will deliver on key sustainability and social objectives and core strategy policy objectives i.e. 30% affordable housing and > 20% renewable.

PPS12 states that the LDF should deliver the "most appropriate strategy". Second best is not good enough