Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS582
Response Date	17/09/20 15:49
Consultation Point	Policy SH 1 Settlement Hierarchy (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Justified
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation

Question 4

Changes Sought

Please Note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.*

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Please set out what change(s) to the Local Plan you consider necessary to make it legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

See attached representation - changes required to wording of Service Village policy.

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS583
Response Date	17/09/20 15:49
Consultation Point	Policy DC 1 Sustainable Design Principles and Climate Change (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Effective . Justified . Consistent with national policy
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 4

Changes Sought

Please Note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.*

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See attached representation.

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS584
Response Date	17/09/20 15:49
Consultation Point	Policy DC 2 Flood Risk & Water Management (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	Yes
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation

Question 4

Changes Sought

Please Note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.*

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See attached representation (changes required for clarity)

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS585
Response Date	17/09/20 15:49
Consultation Point	Policy DC 3 Health and Wellbeing (View)
Status	Processed
Submission Type	Email
Version	0.9
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Justified
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 4

Changes Sought

Please Note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.*

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See attached representation.

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS587
Response Date	17/09/20 15:49
Consultation Point	Policy H 1 Housing Requirement (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	Yes
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

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If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS588
Response Date	17/09/20 15:49
Consultation Point	Policy H 2 Housing Allocations (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.8
Files	200908 Strategic Representations Story Homes v3.pdf Appendix i.pdf
Question 1b	
Do you consider that the Local Plan sound?	Yes
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation

Question 4

Changes Sought

Please Note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.*

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See attached representation (request the inclusion of land at Hurworth on Tees)

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make out points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS589
Response Date	17/09/20 15:49
Consultation Point	Policy H 4 Housing Mix (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Justified
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 4

Changes Sought

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See attached representation (further evidence required in terms of housing mix)

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

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We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS590
Response Date	17/09/20 15:49
Consultation Point	Policy ENV 3 Local Landscape Character (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Justified
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 4

Changes Sought

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See attached representation.

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

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Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS591
Response Date	17/09/20 15:49
Consultation Point	Policy ENV 5 Green Infrastructure Standards (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Consistent with national policy
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation.

Question 4

Changes Sought

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See attached representation.

Question 5

Attendance at Examination Hearings

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Question 5a

Participation at Examination Hearings

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Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS592
Response Date	17/09/20 15:49
Consultation Point	Policy IN 2 Improving Access and Accessibility (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	200908 Strategic Representations Story Homes v3.pdf
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	. Consistent with national policy
Question 3a	
Your Comments	

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation

Question 4

Changes Sought

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See attached representation

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

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Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS593
Response Date	17/09/20 15:49
Consultation Point	Site 20 - Great Burdon (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Appendix iii.pdf 200908 Strategic Representations Story Homes v3.pdf

Question 2

Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)

Question 3a

Your Comments

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached representation

Question 4

Changes Sought

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See attached representation

Question 5

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If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

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Question 6

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Comment

Agent	Mr Tom Baker (1169427)
Email Address	[redacted]
Company / Organisation	Savills (UK) Limited
Address	[redacted]
Consultee	Story Homes (1251000)
Company / Organisation	Story Homes
Address	[redacted]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Story Homes (Story Homes - 1251000)
Comment ID	DBLPPS594
Response Date	17/09/20 15:49
Consultation Point	Site 99 - Maxgate Farm, MSG (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	200908 Strategic Representations Story Homes v3.pdf Appendix ii.pdf
Question 1a	
Do you consider that the Local Plan is Legally compliant?	Yes
Question 1b	
Do you consider that the Local Plan sound?	Yes
Question 1c	
Do you consider that the Local Plan complies with the Duty to Cooperate?	Yes

Question 2

Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)

Question 4

Changes Sought

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See attached representation

Question 5

Attendance at Examination Hearings

If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?	Yes, I wish to participate at the examination hearings

Question 5a

Participation at Examination Hearings

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If you wish to participate at the examination hearings, please outline why you consider it to be necessary?

We wish to make our points orally given the complexity of the issues to be discussed.

Question 6

Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?	Yes, I request to be notified

Darlington Proposed Submission Local Plan

Land North of Neasham Road, Hurworth

savills

Contents

1.	**Introduction**	**1**
2.	**Site Context**	**2**
3.	**Services and Amenities**	**4**
4.	**Vision / Development Proposals**	**5**
5.	**Deliverability of the Site for a Residential Use**	**6**

1. Introduction

1.1 These representations have been prepared by Savills (UK) Ltd on behalf of Story Homes in response to the emerging Darlington Proposed Submission Local Plan 2020 (eDLP) consultation (Regulation 19).

1.2 These representations support the proposed residential allocation of land north of Neasham Road, Hurworth (or 'the site'). The site provides the opportunity to deliver approximately 190 dwellings in a sustainable location which is well-related to the existing settlement of Hurworth and the facilities and infrastructure located within the settlement. The site can ensure that sufficient housing allocations are provided throughout the plan period in Hurworth to meet the social and economic needs of the village.

1.3 This statement should be read alongside Story Homes' overarching response to the eDLP submitted under separate cover. That response contains a detailed assessment of the overall soundness of the eDLP against national policy and suggests amendments on that basis.

The National Planning Context and Basis of These Representations

1.4 The National Planning Policy Framework (NPPF) (2019) and PPG constitute the national planning policy regime and the eDLP will need to be found sound in accordance with these policies. The NPPF states, at paragraph 35, that Local Plans will be found sound if they are:

- Positively prepared - *"providing a strategy which,* ***as a minimum, seeks to meet the area's objectively assessed needs****; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development"*
- Justified - "*an appropriate strategy, taking into account the* ***reasonable alternatives****, and* ***based on proportionate evidence***"
- Effective - "***deliverable over the plan period****, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground"*
- Consistent with national policy – "***enabling the delivery of sustainable development in accordance with the policies in this framework***"

1.5 The following sections of this report are arranged as follows:

- Section 2: The site context;
- Section 3 The site's access to services and amenities;
- Section 4: The proposed vision for the development;
- Section 5: The site's suitability, availability and achievability for housing; and
- Section 6: A summary

2. Site Context

Site Description

2.1. The site is located immediately adjacent to the eastern edge of Hurworth, approximately 400m from the village centre. The location of the site and other key landmarks are shown at Figure 2.1 below.

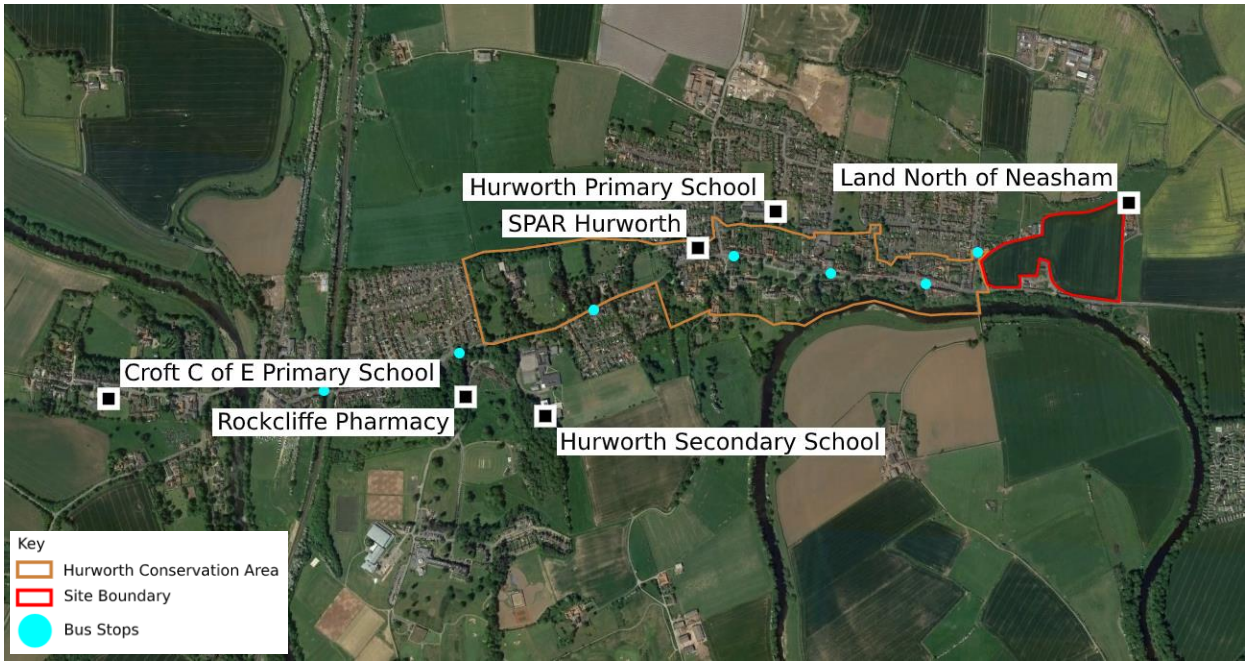

***Figure 2.1**: Satellite view of Hurworth with key areas annotated*

2.2. The site is located to the north of Neasham Road which runs through the centre of the village. Immediately to the west of the site are residential properties at Strait Lane, Emerson Road and Timmys Lane. The site immediately adjoins (but sits beyond) the Hurworth Conservation Area to the west which covers the central part of the village. It forms a logical extension to the village in an area which would not affect the special characteristics of the Conservation Area.

2.3. Whilst the site sits close to the River Tees and Cree Beck, it is in Flood Zone 1 and is therefore at a low risk of flooding.

Figure 2.2: *Photograph of site looking from the entrance to the east*

2.4. The site covers approximately 7.3 hectares in area and comprises an open agricultural field surrounded by mature hedgerows and trees. The site is relatively flat and has been intensively crop-farmed and so its environmental interest is low.

Planning Policy

2.5. The Site is shown to be located outside of the Development Limits of Hurworth in the 1997 Local Plan (Amended 2001) and is designated as an 'Area of High Landscape Value' . More recently however the site has been assessed within the 2017 Housing and Economic Land Availability Assessment (or 'HELAA'). **The site (site no. 83) was concluded to be suitable, available and achievable for the delivery of approximately 190 dwellings between the 6-10 year and 11-15 year periods**. Further discussion on this assessment can be found later in section 5 of this statement. Furthermore, whilst the eDLP identified the site as beyond the draft Development Limits, it is no longer designated as an area of high landscape value.

3. Services and Amenities

Specific Aims and Objectives

3.1. The site is well located in close proximity to services, local amenities, public transport, community facilities and employment areas. The list below shows the services and facilities accessible to the site:

- Retail Opportunities
    - Public Houses (Bay Horse / Otter and Fish) and restaurant/takeaways along eastern Church Row
    - Retail units north of The Green/Croft Road

- Education Facilities
    - Hurworth Primary School
    - Hurworth Secondary School
    - Priory Hurworth House School

- Health Facilities
    - Rockcliffe Surgery
    - Hurworth Dental Practice
    - Rockcliffe Court Surgery & Pharmacy

- Community Facilities
    - All Saints Church – Hurworth
    - Bus stop library
    - Hurworth Grange Community Centre

- Sport and Recreation Opportunities
    - HASCO Sports Field
    - Hurworth Albion
    - Kyosho Karate – Martial Arts Club
    - Rockcliffe Park Cricket Club

3.2. The site also benefits from immediate access to public transport. A bus stop at Strait Lane provides the site with access to the 12 bus route, which connects Hurworth to Darlington, Teesside Airport and surrounding settlements.

4. Vision / Development Proposals

4.1. The site provides an opportunity to deliver approximately 190 high quality dwellings in a sustainable location on the edge of the settlement of Hurworth.

4.2. Whilst our client has yet to design a detailed proposal for the site, Story Homes is committed to delivering an ambitious and high quality scheme, which responds to the local context of Hurworth with a view to including the following key design features:

- Design principles which respect of the traditional architectural style of the wider village of Hurworth including the Conservation Area (see below);
- Provision of a range of different sized dwellings which enable the creation of a mixed community including the provision of affordable homes which respond to local need in terms of size, type and density;
- Provision of a safe access onto Neasham Road to facilitate trips to and from the site and provide safe pedestrian and cycling access;
- Landscaping proposals which help integrate the site into its surroundings, reinforcing planting along the eastern and northern boundaries in particular, to provide a defensible village boundary; and
- Provision of play and amenity space for residents which enables safe enjoyment of the residential estate

4.3. Overall, development of the site provides an opportunity to deliver high quality market and affordable homes in a sustainable and visually attractive landscaped setting.

5. Deliverability of the Site for a Residential Use

5.1. The site has previously been assessed as "*Site 83: North of Neasham Road, Hurworth*" in the 2017 HELAA (**See Appendix 1**). In the 2017 HELAA, the Council correctly assessed the site as being **suitable, achievable and available** for a residential use, with expected deliverability timeframes of 6-10 years and 11-15 years. It is clear these conclusions remain the same today as nothing on the ground has changed to meaningfully alter any of the results from the previous assessment. To assist on this matter, we consider each of the above matters further below.

Suitability

5.2. The Planning Practice Guidance (PPG) states:

"A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated." (ref: ID: 3-017-20190722)

5.3. The PPG goes on to state that *"When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:*

- *national policy;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation."*

5.4. In respect of the subject site, we consider the following:

- The site has no physical issues which affect its suitability for housing development. The site is not located in an area at risk of flooding (it is entirely within Flood Zone 1), does not suffer from contamination or ground stability issues and is not affected by air pollution or odour issues. The site has multiple options for a safe access to the adopted highway for both pedestrians and vehicles and is accessible to public transport with bus stops located within 100 metres of the site boundary. Local services in Hurworth, as identified previously, including primary/secondary schools, a local church and a community centre are all accessible from the site by foot and bicycle. The site therefore contributes towards the objectives of Darlington's Sustainable Community Strategy which encourages people to feel part of their community and be more physically active to improve health.

- The site is not in an area protected for its ecological or historical importance. Despite this, the site is adjacent to both the Hurworth Conservation Area and a Grade II listed structure to the south, Strawberry Cottage. By utilising appropriate mitigation where necessary and sensitive scheme design, this is not considered to be a constraint to the development of the site. In fact Story Homes considers that their

design approach is often benefited by the proximity of such features given the importance placed upon high quality sympathetic design choices.

- In market terms, the site's location on the edge of Hurworth in south Darlington would be suitable for a full range and choice of housing. In particular the site location provides an ideal location for the provision of higher quality detached and semi-detached family housing with gardens.

- The site is of a scale that it can deliver homes whilst protecting the amenity of existing and prospective residents. Adequate set back distances can be achieved within the site to ensure privacy and overlooking is not an issue.

5.5. In conclusion, given the absence of technical constraints and the site's sustainable location in relation to Hurworth village, the site clearly continues to remain suitable for residential development following the 2017 HELAA.

Availability

5.6. The PPG (ID 3-019-20190722) advises:

"A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development."

5.7. Our client has an option agreement with the site landowner and can confirm that all of the land is available for housing immediately. Indeed it is now the express intention of our client to facilitate the housing development of the site at the earliest opportunity. Furthermore, the landowners have also confirmed that there are no legal or ownership impediments to development. This confirms the absence of difficulties in landownership recorded in the 2017 HELAA.

Achievability

5.8. The PPG (ID 3-020-20190722) advises:

"A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time."

5.9. Story Homes has an option agreement with the landowner over the entire site and access can be facilitated without the requirement of any additional third party land. There are therefore no legal ownership impediments to development that would obstruct or delay delivery.

5.10. In our view the scale of the site is capable of securing approximately 190 houses, subject to more detailed design work and consideration of potential mitigation. We consider that a build-out rate of approximately 30-40 dwellings per annum is easily achievable.

6. Summary

6.1. Story Homes is a homebuilder with more than 30 years history of developing high quality residential developments across the North East, North West and Cumbria.

6.2. The site is readily available, with a realistic prospect of delivery within 5 years in accordance with the definition in the PPG. Subject to an allocation for residential development being secured, a planning application for housing development could be submitted within 12 months. The site is in a strong and established residential market.

6.3. The previous 2017 HELAA, which concluded that the site was **suitable, available and achievable,** demonstrated that there would be limited technical constraints to development and any issues can be reasonably mitigated against. The absence of technical constraints also means that delivery on the site would not be delayed. Therefore the site could be completed within 5-10 years, contributing to Darlington's housing targets and subsequent economic objectives set out in the plan.

6.4. In summary, development of the site provides a unique opportunity to deliver an aspirational development on a sustainable and visually attractive landscaped site.

Appendix 1
HELAA Site Assessment 83 - “North of Neasham Road”

Borough of Darlington
Housing and Employment Land Availability Assessment (HELAA)

SITE 83: North of Neasham Road, Hurworth

Assessment Pack

DARLINGTON
BOROUGH COUNCIL

A) Site Details

1	Site Name	North of Neasham Road, Hurworth	
2	Site Address or Nearest Postal Address	Hurworth / Hurworth Village / Neasham Road / DL2 2LY	
3	Site Size (ha)		7.26ha
4	OS Location	Map Ref E: 431333 Map Ref N: 510221	
5	Site Boundaries	As on map	
6	Current Use	Agriculture	
7	Surrounding Land Uses	Agriculture / Residential	
8	Character of Surrounding Area	Rural Edge of Village	
9	Physical Constraints (Trees, contamination, sewers etc)	Listed Building / Eastern edge of Conservation Area /	
10	Development Progress		

*Additional Information

As well as completing the assessment pack, in order to catalogue the site effectively it is essential the following additional information should, be attached:

- OS map with site development boundary clearly defined
- Where available site photographs, including aerial photographs

B) Site Suitability

Proximity to Services		Tick Relevant Box				Comments
11	The nearest GP is within 1km	Yes	x	No		
12	The nearest primary school is within 1km	Yes	x	No		
13	The nearest secondary school is within 2km	Yes	x	No		
14	The nearest local/district/town centre is within 2km	Yes	x	No		
15	The nearest significant employment site is within 2km	Yes		No	x	
16	Daytime (8am to 6pm) bus services operate every 30 mins or better during weekdays within 300m	Yes	x	No		

Maximising the use of Previously Developed Land		Tick Relevant Box				Comments
17	Entirely brownfield	Yes		No	x	
18	Majority brownfield	Yes		No	x	
19	Majority greenfield	Yes		No	x	
20	Entirely greenfield	Yes	x	No		

Sequential Approach to Development		Tick Relevant Box				Comments
21	Locally important open space	Yes		No	x	
22	Outside of development limits	Yes	x	No		

Employment Land		Tick Relevant Box				Comments
23	Is it used or safeguarded for employment purposes	Yes	x	No		Small part of the site
24	Is the site identified in the Employment Land Review as being suitable for residential development	Yes		No	x	

Site suitability continued on next page…

Flood Risk		Tick Relevant Box				Comments
25	Within or intersects with flood zone 3	Yes		No	x	
26	Within or intersects with flood zone 2	Yes		No	x	

Hazardous Risk		Tick Relevant Box				Comments
27	Within HSE middle zone (max capacity 30 dwellings)	Yes		No	x	
28	Within HSE outer zone	Yes		No	x	
29	Not within HSE zone	Yes		No	x	

Bad Neighbour		Tick Relevant Box				Comments
30	Is the site adjacent to potentially incompatible neighbouring uses	Yes		No	x	

Conservation		Tick Relevant Box				Comments
31	Is the site within an area of potential archaeological significance	Yes	x	No		
32	Is the site within or may potentially affect and area of ecological significance	Yes		No	x	
33	Is the site within or may potentially affect and area of geological significance	Yes		No	x	

Site Suitability Additional Comments
SITE: SUITABLE

C) Site Availability

Ownership		Tick Relevant Box				Comments
34	Is the site subject to multiple or difficult land ownerships (including ransom strips)	Yes		No	x	
35	Is the site currently actively used and the uses would be difficult to re-locate	Yes		No	x	

Contamination		Tick Relevant Box				Comments
36	The costs (based on an initial desktop assessment) of investigation/remediation are likely to be high	Yes		No	x	

Access		Tick Relevant Box				Comments
37	Satisfactory access can be achieved	Yes	x	No		

Water Infrastructure		Tick Relevant Box				Comments
38	There is adequate water capacity	Yes		No	x	
39	There is a limited water capacity	Yes	x	No		
40	There is no spare water capacity	Yes		No	x	
41	The diversion or easement of mains that cross the site is required	Yes		No	x	
42	Water capacity is unknown	Yes		No	x	

Site availability continued on next page…

Sewerage Infrastructure		Tick Relevant Box				Comments
43	There is adequate sewerage capacity	Yes		No	x	
44	There is a limited sewerage capacity	Yes	x	No		
45	There is no spare sewerage capacity	Yes		No	x	
46	The diversion or easement of sewers that cross the site is required	Yes		No	x	
47	Sewerage capacity is unknown	Yes		No	x	

Highways Capacity Infrastructure		Tick Relevant Box				Comments
48	There are major perceived network implications that would unlikely be resolvable through planning obligation funding	Yes		No	x	
49	There are major perceived network implications that would likely be resolvable through planning obligation funding	Yes	x	No		
50	There are no major perceived network implications	Yes		No	x	

Site Availability Additional Comments
SITE: AVAILABLE

D) Site Achievability

Deliverability		Tick Relevant Box				Comments (for the first 5 years please include Phasing profile on annual basis)
51	0 to 5 Years	Yes		No	x	
52	6 to 10 Years	Yes	x	No		
53	11 to 15 Years	Yes	x	No		
54	More than 15 Years	Yes		No	x	

Employment Land Uses		Tick Relevant Box				Comments
55	B Class Uses (B1 / B2 / B8)	Yes		No	x	
56	Other Commercial Uses	Yes		No	x	
House Types		**Tick Relevant Box**				**Comments**
57	Upper-market executive or executive-style housing (larger detached properties)	Yes		No	x	
58	Mid/Upper-market executive or retirement apartments	Yes		No	x	
57	Mid-market family housing (e.g. detached, semi-detached and large terraced properties)	Yes	x	No		
58	Lower-cost market housing, including 'starter homes'	Yes	x	No		
59	Affordable housing (intermediate or social rented housing)	Yes	x	No		
60	Sheltered or special needs housing	Yes		No	x	

Development Type		Tick Relevant Box				Comments
61	Employment / Commercial Land	Yes		No	x	
62	Housing only	Yes	x	No		
63	Housing as part of a mixed-use development	Yes		No	x	

Site achievability continued on next page…

Dwelling Estimate		Dwelling Numbers / Employment sqm	Comments
64	Based on using the density multiplier technique, the site assessment shows an **indicative dwelling / employment use sqm** estimate of	190	Size x 35 x0.75
65	If different, what is your actual **dwelling estimate / sqm estimate** for the site		

Site Achievability Additional Comments
SITE: SUITABLE/ AVAILABLE / ACHIEVABLE (6-10years) (11-15 years)

engineering solutions, delivering results

FAIRHURST

Our Ref: **EH/114039/025**
Date: **September 2020**

1 Arngrove Court
Barrack Road
Newcastle upon Tyne
NE4 6DB

TEL: 0191 221 0505 FAX: 0844 382 4412
Email: newcastle@fairhurst.co.uk
Website: www.fairhurst.co.uk

Planning Policy
Darlington Borough Council

Via Email

Dear Sirs

ABERDEEN
BIRMINGHAM
BRISTOL
DUNDEE
EDINBURGH
ELGIN
GLASGOW
HUDDERSFIELD
INVERNESS
LEEDS
LONDON
NEWCASTLE
PLYMOUTH
SEVENOAKS
TAUNTON
THURSO
WATFORD
WESTHILL

114039: Representations to Proposed Submission of the Darlington Local Plan (Regulation 19) Consultation – Darlington Local Plan

These Representations are made by Fairhurst on behalf of Story Homes in relation to the Proposed Submission of the Darlington Local Plan. We are aware at this stage comments must relate only to the legal and procedural requirements of preparing the Local Plan and the 'soundness' of the Proposed Submission Draft.

These Representations have no comments to make on the legal and procedural requirements of preparing the Local Plan, however, will focus the soundness of the Proposed Submission Draft. This will focus specifically on the soundness of Policy H2 of the inclusion of Site 99 – Maxgate Farm as an allocated site with an indicative site yield of 260 dwellings. Story Homes are supportive of the current draft of the Darlington Local Plan and can confirm that the inclusion of Site 99 – Maxgate Farm as a housing allocation within Policy H2 is sound and is welcomed.

The NPPF states that Plans are 'sound' if they are:

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

These Representations will demonstrate that these criteria are met with regard to the proposed Policy H2 and the allocation of Site 99 – Maxgate Farm with an indicative site yield of 260 dwellings.

Positively Prepared

The NPPF requires Local Plans to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

Story Homes agree that the inclusion of Site 99 is necessary to ensure that the Local Plan meets the identified housing need in the Borough and within Middleton St George. It is also agreed that the site has an indicative yield of 260 dwellings within the Plan period, with the yield being confirmed through a live planning application for development on the site for 260 dwellings (16/00976/OUT). This planning application was previously scheduled to be determined at Planning Committee on 5th June 2019 with an Officer Recommendation for approval. The application was unfortunately removed from said agenda, with this a determination was not reached. The Committee Report prepared for this meeting demonstrates that there are no statutory or internal objections to the proposed development illustrating that the proposed yield is achievable. Story Homes are committed to the delivery of this site and have consistently worked in a collaborative manner with Darlington Borough Council to bring the site forward in-line with the development Trajectory.

Chairman: R B McCracken *Senior Partner:* R Bryson
Partners: P A Ridge A R Milne G L Bruce D J Clayton I McKay J M Message N M McSpadden A J Scott-Kiddie S J Holmes J Lau G J Allan A R Blair N McGarry A Simmons

Story Homes also welcome that the minimum housing requirement identified within Policy H1 is based upon a commitment to support the economic growth of the Borough and attract new business and industry to the Borough. This is of note within Service Villages such as Middleton St George, as outlined within the Settlement Hierarchy, where new development can help stimulate and maintain economic vitality.

Justified

The NPPF requires Local Plans to be based upon an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Story Homes consider that the strategy to include Site 99 Maxgate Farm as an allocation within Policy H2 for residential development is sound. There is sufficient evidence that this site is deliverable within the plan period and will contribute to achieving the housing required within the Borough. The site, as confirmed in previous representations, has both a willing landowner and a willing developer attached. This evidence is discussed throughout this representation, particularly with regard to the current live planning application for the development of the site.

Through appropriate financial contributions the allocation will also support the Council's strategy to deliver sufficient education facilities throughout the Borough. The scheme will support the land reservation for a school within Site 247 which currently benefits from planning permission with this land reservation included. The delivery of a school on this site is identified within Policy IN10 of the Proposed Submission Draft Local Plan.

Story Homes support the Councils justified and evidence-based led approach to making allocations through the emerging Local Plan, and as demonstrated in the Submission draft. The allocation of Site 99 is a direct result of the housing land availability evidence produced by Darlington Borough Council through the undertaking of a Housing and Economic Land Availability Assessment (HELAA 2017). This aligns with the requirements as set out in the NPPF and the PPG. The evidence-led approach ensures that Darlington Borough Council have considered all reasonable alternatives for future development when proposing an allocation at Maxgate Farm for 260 dwellings.

Effective

The NPPF requires Local Plans to be deliverable over the plan period.

Story Homes can confirm that the site is deliverable over the Plan period, ensuring the deliverability of this element of the Local Plan. In line with the requirements of the NPPF, Story Homes can confirm that the site is:

Available Now: Story Homes have entered into a contractual arrangement with the landowner to purchase the site following the grant of planning permission. The live planning application for the development of the site acts to further demonstrate that the site is currently available for residential development.

Offer a Suitable Location for Development Now: It has been established through the live planning application and the previous officer recommendation for approval that the sites location is appropriate for residential development. This is explored further in the following section of this Representation.

Be Achievable with a Realistic Prospect that Housing will be Developed on the Site in the next 5 Years: As this site is subject to a live planning application submitted by a willing developer and contractual agreement with the Landowner it is evident that the site is achievable. Following the grant of planning permission it is envisaged that housing will begin to be delivered within 5 years with the development being completed within the intended plan period. This aligns with the proposed Development Trajectory as outlined within the Submission draft. The live planning application has also undergone consultation with statutory and internal consultees with no outstanding objections. This demonstrates that the site is deliverable from a technical perspective.

The delivery of this site and associated financial contributions related to the delivery of a new school within Middleton St. George will also act to ensure the effectiveness of the Council's strategy to deliver the education facilities identified in Policy IN10 of the Local Plan. Policy IN10 identifies that land should be reserved for education uses within Site 247 which currently benefits from planning permission with this reservation in place.

Consistent with National Policy

The NPPF requires planning policies to enable the delivery of sustainable development in accordance with the policies of the Framework. Story Homes supports the Councils alignment with national policy with respect to the housing target set out in policy H1. The Housing Requirement is identified as a '**minimum**' figure, this is consistent with current planning policy. Story Homes welcomes that the housing target, as set out within Policy H1, is not identified as being a restrictive maximum figure and consider that this is in line with the NPPF requirement to boost the supply of housing and identify the minimum number of homes needed.

With specific regard to Site 99 its allocation is considered to be entirely consistent with the requirements and sustainable development principles of the NPPF. The NPPF aims to ensure the delivery of a sufficient supply of homes and that a sufficient amount of land can come forward where it is needed. The allocation of land within a Service Village ensures a range of type and size of new dwellings can come forward where development need is identified, including settlements outside of the urban core.

As set out above the site benefits from a live planning application which was previously intended to be determined by planning committee with an officer recommendation for approval (16/00976/OUT). The Committee Report prepared in respect of this states '*the application site is in an area which the Council considers to be suitable for housing development*'.

In the determination process undertaken to date, the application has been subject to review by statutory and internal consultees and there are no outstanding objections. This demonstrates that the site is considered to accord with national planning policy in relation to each technicality.

In conclusion Story Homes support the Submission Draft Local Plan and consider that the above demonstrates that the allocation of Site 99: Maxgate Farm for residential dwellings is a sound contribution to the Local Plan and will act to assist in ensuring the deliverability of the plan.

I trust that the above is self-explanatory, however if you should have any further queries please do not hesitate to contact me.

Yours Sincerely,

Dominic Waugh MRTPI
Technical Director – Planning and Development

Tel: 0191 221 0505
Email: Dominic.waugh@fairhurst.co.uk

Site specific representations to the Darlington Borough Council Proposed Submission Local Plan - August 2020

Land at Great Burdon (Site 20)

Prepared on Behalf of Bellway Homes Ltd and Story Homes Ltd

September 2020

bartonwillmore.co.uk

BARTON WILLMORE

Site specific representations to the Darlington Borough Council Proposed Submission Local Plan - August 2020

Land at Great Burdon (Site 20)

Prepared on Behalf of Bellway Homes Ltd and Story Homes Ltd

Status:	Draft	Final
Issue/Rev:	01	02
Date:	September 2020	September 2020
Prepared by:	CB	CB
Checked by:	JH	JH
Authorised by:	JH	JH

Barton Willmore LLP
1st Floor
14 King Street
Leeds
LS1 2HL

Tel: 0113 204 4777

Email: chris.binns@bartonwillmore.co.uk

Ref: 29109/A5/Reps/CB

Date: September 2020

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Appendices

A Context Plan

B Indicative Masterplan

C Infrastructure Delivery Statement

1.0 INTRODUCTION

Background

1.1 Barton Willmore is instructed by Bellway Homes Ltd/Story Homes Ltd (hereafter referred to as our 'Clients') to submit representations to the Darlington Borough Local Plan Proposed Submission currently subject to public consultation until 17 September 2020.

1.2 Our Clients are some of the UK's leading housebuilders, committed to the highest standards of design, construction and service. They have a number of site interests across Darlington and are therefore keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

Land Interests

1.3 This site-specific document focusses solely on the land at Great Burdon. A site Context plan outlining the site can be found in **Appendix A** of this report along with the latest Indicative Masterplan at **Appendix B** and a Infrastructure Delivery Statement at Appendix C.

Consultation

1.4 The current consultation seeks comments on the Proposed Submission version of the Darlington Borough Local Plan.

1.5 The Plan sets out the broad spatial planning and policy framework for Darlington Borough up to 2036. The current consultation runs for a period of six weeks from 6 August 2020 to 17 September 2020 and this is the final opportunity to comment on the legal compliance and soundness of the Local Plan before it is submitted for independent examination by the Planning Inspectorate.

The National Planning Context

1.6 These representations set out our Clients' comments on the Proposed Submission Local Plan and highlight several issues in relation to the Local Plan that our Clients believe should be addressed during the examination stage.

1.7 Where appropriate, these representations refer to relevant paragraphs in the revised National Planning Policy Framework (2019) (the NPPF), with which the Local Plan must be consistent. Paragraph 35 of the NPPF sets out that the Plan must be:

> **Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;**

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.8 We trust these representations will be afforded full consideration by Darlington Borough Council (the 'Council') and the Inspector in relation to the emerging Local Plan.

Structure of this Report

1.9 These representations refer to our Clients' land interest at Great Burdon.

2.0 SITE SPECIFIC REPRESENTATIONS – GREAT BURDON

Overview

2.1 Site specific representations relating to Great Burdon are provided below. A site Context Plan outlining the sites can be found in **Appendix A** of this Report.

Site 20: Great Burdon

2.2 Our Clients' land interests at Great Burdon is allocated as an urban extension by Policy H2. It is anticipated that the site will deliver approximately 1,250 dwellings, along with a range of other uses including Green Infrastructure, public open space, and new walking and cycling corridors. Whilst out Client supports the principle of the allocation, they have some formal objections to Policy H2, and the site references in Appendix A and Appendix B and reserve the right to expand on this at the subsequent Examination.

2.3 The site is located on the eastern edge of Darlington, approximately 2.5 miles from Darlington town centre and in close proximity to the village of Great Burdon. The site measures approximately 96 hectares in size and comprises low quality agricultural land.

2.4 The site is sustainably located and has a range of services within walking and cycling distance. It is served by a number of existing vehicular and pedestrian access points and is easily accessible by public transport.

2.5 In terms of topography the site gently rises along the western boundary, peaks at a local high point in the centre, and then falls towards the northern, eastern and southern boundaries.

2.6 Towards the eastern edge of the site is a Scheduled Monument comprising a World War II bombing decoy control shelter and is located approximately 600 metres to the south-east of Great Burdon Farm.

2.7 With specific reference to Policy H2 our Client **objects** to the housing delivery targets and believes that the delivery of new dwellings should be increased to 625 dwellings during the Plan period, rather than 500 dwellings, to tie in with the delivery outlined in the Infrastructure Delivery Statement Appended to these Representations at **Appendix C.**

2.8 Our Client also **objects** to the housing trajectory for the site as set out in Appendix A of the Local Plan. The delivery of our Clients site earmarked for 2027 can be brought forwards to 2024/25.

2.9 With reference to Appendix B within the Local Plan our Client **objects** to the wording of the following subsections:

2.10 Section e) Our Client recommends the wording should be amended from 'significant new green infrastructure' to 'appropriate new green infrastructure';

2.11 Section i) relating to the easements of the utilities – these could also be diverted where appropriate rather than accommodating them as they are;

2.12 Section j) Our Client recommends the wording is amended from 'significant buffer' to 'appropriate buffer'. We also object to the reference to 'monitoring', this is overly onerous on the developer and incurs unnecessary costs; and

2.13 Section k) the former Stockton and Darlington Railway route lies outside of the site so the text should be amended from 'incorporated into the development' to 'respected by the development'.

2.14 The amendments proposed above are considered to meet the relevant tests of soundness required by paragraph 35 of the NPPF. Our Client objects to the wording of Policy H2 and Appendix B as written as they are not 'effective', 'justified' or 'positively prepared'.

2.15 To inform development of the site, various supporting technical work has been undertaken to help inform the constraints and opportunities of the site and to develop an indicative masterplan for the site, the following sub headings touch upon these.

Transport and Access

2.16 The site is located to the north of the B6279, Darlington Eastern Transport Corridor (DETC) and bound to the east by the A66 and to the north by the A1150, Darlington Road.

2.17 It is currently envisaged that the site will be accessed to the north via a new signalised junction formed with the A1150, Darlington Road and will utilise the existing signal-controlled junction on the B6279 along the southern boundary of the site. In response to Appendix B of the Local Plan, which requests that the site layout makes an allowance for a distributor road which will run north south through the site, the Context Masterplan incorporates this vital infrastructure.

2.18 In addition to the proposed distributor link road providing connectivity through the site, the location makes it possible to utilise the existing infrastructure in the area to encourage and enhance the use of sustainable modes of travel, including bus connectivity through the site and improvements to pedestrian and cycle links (in line with the Council's Health Agenda), whilst providing access to the local, regional and nationally significant strategic road network and mainline rail services. All of the above provisions are intrinsic to the sustainability of the site.

Ecology

2.19 A number of ecological surveys have been carried out on the site which demonstrate that there are no significant ecological constraints to development. Furthermore, the proposed development will achieve net gains for nature conservation to align with the Council's requirements and in accordance with national planning policy. At the time of writing ongoing surveys have been undertaken and further, up to date ecology survey information will be submitted as part of a planning application for the site in due course.

Landscape

2.20 The site has been assessed for its key landscape and visibility characteristics. It is an area of pastoral and arable farmland on the eastern edge of Darlington with a relatively poor tree and hedgerow pattern. The line of the River Skerne marks the sites western boundary; and other boundaries are formed by a network of roads including the A1150, A66 and the B6279.

2.21 The landform pattern of the site is a distinctive feature. The western boundary lies in the flood plain of the River Skerne (at approximately 44m AOD); the land then rises in an undulating pattern to a local high point in the northern and central part of the site (at approximately 64m AOD); levels then fall to the north, east and south. In line with the aspirations of Appendix B of the Local plan the proposal is to bolster the boundaries of the site adjacent to the A1150, A66 and B6279 and to retain historic field boundaries.

2.22 As such, the proposed development is designed to respond to the site and surrounding area and will not result in any adverse effects which would preclude development.

Flood risk

2.23 The site is identified as being located across Flood Zones 1, 2 and 3. The River Skerne flows south through the western part of the site. In accordance with national planning policy and Environment Agency guidance, development of residential dwellings and community facilities will only be considered within Flood Zone 1 (areas which have a flood risk of 1 in 1,000 years or greater from fluvial sources) and this is clearly demonstrated on the Context Plan.

2.24 The western part of the site will be restricted to appropriate uses for Flood Zones 2 and 3. These uses will include the creation of wildflower meadows, wetlands, and public open landscape.

2.25 The development will be designed to ensure that there will be no net increase in surface water flows to the river and surface water from the development will be restricted to pre-development 1 in 1-year greenfield rates, via SUDS attenuation ponds and wetlands created as part of the landscape area.

2.26 The creation of SUDS areas will allow surface water from the development to be treated naturally in accordance with SUDS guidance, to ensure that water quality is maintained or even enhanced from the current use.

2.27 In addition to the attenuation of flows, wetland areas and ponds will add to the ecological diversity of the open space.

Archaeology

2.28 An archaeological desk-based assessment has been undertaken on and around the site. With the exception of the cropmark sites, the potential archaeological remains within the proposal area relate to low-level, low-impact activity, are utilitarian in nature and are not considered to be high quality or important heritage assets.

2.29 The desk-based assessment and the information available identified a SAM on the site and heritage assets to the north west, these are clearly showin on the Context plan and will inform the future development of the site. Aside from the aforementioned, it is concluded that no high quality or important assets have been identified in connection with the site.

Noise

2.30 A noise survey has been carried to assess the noise levels resulting from road traffic on the A1150, A66 and B6279. Attended noise measurements were taken at various monitoring locations.

2.31 The results of the assessment confirm that the proposed development could be accommodated on the site without any significant adverse effects, subject to design and suitable mitigation.

Conclusion

2.32 The site represents a sustainable and logical residential extension to the existing settlement. The site is deliverable and will significantly contribute to Darlington's identified housing need. The allocation of this is therefore fully supported by our Clients.

2.33 An indicative Master Plan is provided at **Appendix B**.

3.0 CONCLUSIONS

3.1 Barton Willmore is instructed by Bellway Homes Ltd and Story Homes Ltd to submit representations to the Darlington Borough Local Plan Proposed Submission Local Plan 2016 - 2036 which is currently subject to public consultation until 17 September 2020.

3.2 These representations set out our Clients' comments on the Proposed Submission Local Plan with specific reference to Great Burdon identified as Site 20 within the Council's Housing Employment Land Availability Assessment 2018 (HELAA) and Appendix B of the Plan.

3.3 It is considered that residential development at Great Burdon will help support the provision of a significant number of new dwellings required to meet the Council's identified housing need. Our Clients' land interests at Great Burdon is allocated as an urban extension by Policy H2. It is anticipated that the site will deliver approximately 1,250 dwellings, along with a range of other uses including Green Infrastructure, public open space and new walking and cycling corridors.

3.4 The site is sustainably located and has a range of services within walking and cycling distance. It is served by a number of existing vehicular and pedestrian access points and is easily accessible by public transport.

3.5 The site at Great Burdon represents a sustainable and logical mixed-use urban extension to the existing settlement. The site is deliverable and will significantly contribute to Darlington's identified housing need. The allocation of this is therefore fully supported by our Clients.

3.6 Site location plans outlining the site can be found in **Appendix A** of this Report along with the latest indicative Masterplan at **Appendix B.**

3.7 We trust these representations will be afforded full consideration by Darlington Borough

APPENDIX A

Context Plan

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REV	BY	DATE	NOTE

1. Vehicle access is to be taken from Darlington Road (A1150) and Tornado Way (B6279).
2. Distributor road which will run north south across the site, linking Darlington Road (A1150) and Tornado Way (B6279).
3. Development to be concentrated on the southern part of the site to the south-east of Burdon Hill.
4. The western area of the site is within flood zone 2 and 3 Development avoided within this area.
5. The river corridor of the River Skerne along the western boundary to be protected and enhanced.
6. Local recreation and green infrastructure links surrounding Red Hall Local Wildlife Site to be expanded, with additional green buffer before the development site.
7. Vegetation along existing road corridors strengthened in order to enhance green connectivity.
8. Historic field boundaries maintained.
9. Appropriate easements provided to existing pylons and gas mains crossing the site.
10. Appropriate buffer to the Scheduled Monument with improved interpretation and accessibility to this historic asset.
11. Access to and relationship with the historic route of the former Stockton and Darlington Railway.
12. A Public Right of Way crosses the western part of the site, north to south, to be incorporated into the site proposals.

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TOFFEE FACTORY | NEWCASTLE UPON TYNE | NE1 3DF | 0191 495 7700 | INFO@PODNEWCASTLE.CO.UK

PROJECT:

Land at Great Burdon, Darlington

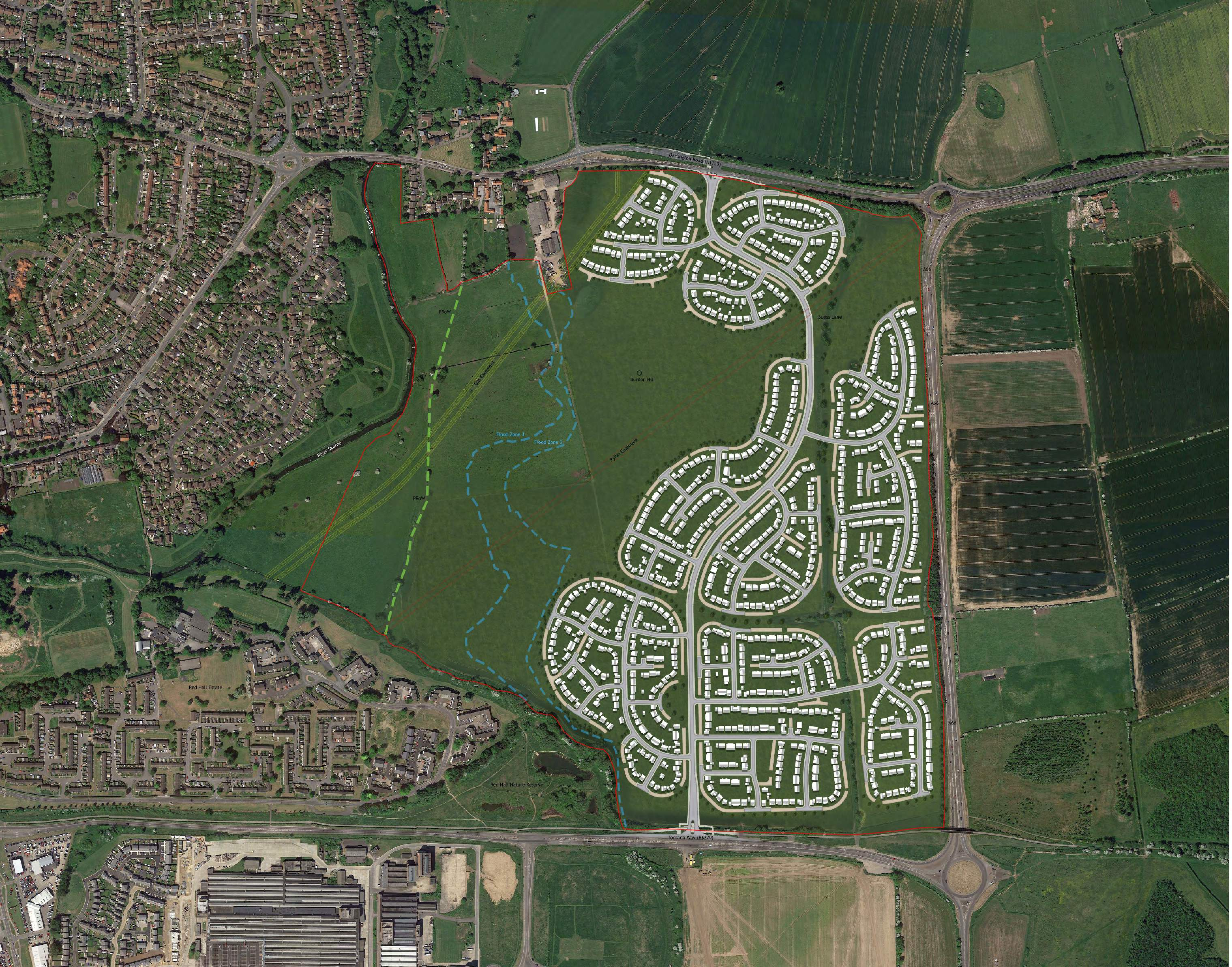
DRAWING TITLE:

Indicative Context Plan

CLIENT:		STATUS:		
Bellway Homes (NE) Ltd		Stage 1		
SCALE: 1:2000	SHEET SIZE: A0	DATE: 09:20	DWN BY: LC	CHECKED BY: CVB
PROJECT NO: 119-BEL	DRAWING NO: 200		REVISION:	

APPENDIX B

Indicative Masterplan



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REV	BY	DATE	NOTE

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PROJECT:
Land at Great Burdon, Darlington

DRAWING TITLE:
Indicative Masterplan as Proposed Aerial Montage

CLIENT:	STATUS:
Bellway Homes (NE) Ltd	Stage 1

SCALE:	SHEET SIZE:	DATE:	DWN BY:	CHECKED BY:
1:2000	A0	09:20	LC	CVB

PROJECT NO:	DRAWING NO:	REVISION:
119-BEL	200	

APPENDIX C

Infrastructure Delivery Statement

Burdon Hill, Darlington

Infrastructure Delivery Statement

September 2020

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Appendix 2 Indicative Proposed Masterplan

1. Introduction

1.1 This Statement has been prepared by Bellway Homes (North East Division) ('Bellway Homes') and Story Homes to provide information on infrastructure delivery in support of the emerging allocation in the Darlington Local Plan of land at Great Burdon on the eastern edge of Darlington known as 'Burdon Hill'.

Background and Purpose

1.2 Burdon Hill is a proposed strategic urban extension housing allocation in the 'Darlington Borough Local Plan – Proposed Submission Local Plan 2016 – 2036' (August 2020). It is referred to as 'Great Burdon (strategic)' in the Plan and allocated under Policy H 2 with 500 dwellings to be delivered during the Plan period and 750 dwellings beyond 2036. It is identified as Site 20 in Appendix B – 'Housing and Employment Allocation Statements'.

1.3 The Site was also included in the previous iteration of the emerging Local Plan which was published in June 2018 where it was allocated for 550 dwellings during the Plan period and 700 dwellings beyond 2036. Part of the Site was also part of the Eastern Urban Fringe strategic allocation in the adopted Core Strategy (2011).

1.4 Bellway Homes and Story Homes consider that the Site offers a unique opportunity to deliver a high quality sustainable neighbourhood in the east of Darlington. The development would provide quality housing in an accessible landscape led scheme which will contribute to meeting Darlington's future housing aspirations.

1.5 Bellway Homes and Story Homes have been working with Darlington Borough Council and other stakeholders to promote the Site. This Statement sets out key considerations about the Site including identifying the infrastructure requirements linked to the proposals and the approach to the schemes delivery.

Structure

1.6 This Statement comprises a series of sections which set out the strategic context, opportunity and deliverability of the Burdon Hill site as follows:

- **Section 2: Strategic Context –** a strategic description of the context of the Site;
- **Section 3: The Opportunity at Burdon Hill –** a description of the proposed opportunity that Burdon Hill offers to Darlington;
- **Section 4: Infrastructure Provision –** details of the infrastructure provision related to the proposals for Burdon Hill;
- **Section 5: Site Deliverability –** discussion on the deliverability and phasing of infrastructure for the Burdon Hill development; and
- **Section 6: Summary and Conclusions –** a summary of the main factors and merits of the Burdon Hill proposals.

2. Strategic Context

2.1 This section of the Statement describes the strategic context of the Site.

2.2 Darlington is one of the most strategically located Boroughs in the North East of England, mainly due to its transport connections (road, rail and air transport) and the strength and versatility of its local economy. Darlington, is therefore, an attractive location to both live and work within the North East of England. The introduction of additional residential and employment-led development will help stimulate economic growth which will ultimately aid regeneration within the urban core and make Darlington a more attractive place to live, work and invest in.

2.3 The site at Burdon Hill should be considered against all levels of policy making, starting with the National Planning Policy Framework (NPPF 2019) of which all proposals seek to accord with. The NPPF is used as a plan-making tool with the emerging Darlington Local Plan, which is currently at Proposed Submission draft. The site at Burdon Hill is included within the emerging Local Plan as a Strategic Allocation (site reference 20) for approximately 1,250 dwellings across and beyond the Plan period. It should be noted that the site was previously included within the previous iteration of the Local Plan (published June 2018).

2.4 The emerging Darlington Local Plan is the strategic development plan which will enable and facilitate growth within Darlington Borough. It is critical to implementing and grasping the opportunities presented in the Region, as well as planned investments elsewhere in the North East. In this respect, the emerging Darlington local Plan seeks to establish a pragmatic and achievable yet aspirational plan for growth which can revitalise communities and encourage the local economy.

2.5 As outlined within this document, and the associated Site-Specific Representation, Darlington Borough Councils spatial strategy is led by a series of large-scale developments which deliver a significant proportion of the housing requirement. This is alongside a level of medium and small-scale development in settlements outside of the urban core to provide a mix and variance to residential development in the Borough. With this in mind, the allocation of Great Burdon aligns with this spatial strategy, allowing the Council to pursue an ambitious growth strategy. The planned expansion of the Borough, through a plan-led approach, not only aligns with the principles within the NPPF but allows it to be brought forward in a sustainable manner.

2.6 Bellway Homes and Story Homes are supportive of the emerging Darlington Local Plan and are encouraging of the Councils pro-growth stance. Through collaborative work with the Council and key stakeholders, it is thought a sustainable and high-quality scheme can be brought forward and the Burdon Hill site.

3. The Opportunity at Burdon Hill

3.1 Burdon Hill offers the opportunity to deliver a sustainable development within the eastern urban fringe of Darlington. The c. 96 hectare Site is located in a sustainable location with good transport connections close to a range of services and facilities which can be easily accessed by local residents. These include retail, employment, schools, medical facilities, and sports facilities all within reasonable walking distance.

3.2 The size of the Site provides the opportunity to create a landscape-led community providing housing within green surroundings. There is significant potential for Green Infrastructure and biodiversity enhancements across the Site as part of the proposals.

3.3 The Site is considered to be one of the best sites in the Borough and its allocation has been supported by Darlington Borough Council through various planning policy documents. Part of the Site was allocated within the Eastern Urban Fringe strategic allocation in the adopted Core Strategy in 2011. The Site has been supported through subsequent evidence base work by the Council culminating in its current emerging allocation in the new Local Plan.

3.4 It is noted that the development will necessitate delivery of new and enhanced infrastructure provision within the Site and local area. This will ensure that the development is capable of integrating with existing neighbouring communities and the character and sense of place in its eastern Darlington location.

Site Suitability

3.5 Bellway Homes and Story Homes have undertaken wide ranging and detailed technical surveys and assessments of the Site over a number of years to ensure that opportunities and constraints of the Site have informed the indicative masterplan proposals. These have included in relation to:

- Transport
- Ecology
- Landscape
- Heritage/Archaeology
- Topography
- Air Quality
- Noise
- Flood Risk and Drainage
- Ground Conditions
- Utilities

3.6 These have been discussed in previous representations to emerging local planning policy and included in a previous Vision Statement for the Site.

3.7 The surveys and assessment work has demonstrated that the Site is not subject to any significant or insurmountable constraints which would present an obstacle to development. Indeed, they highlight the opportunities that exist at the Site to create a sustainable residential community.

3.8 It is recognised that updated surveys, including those relating to ecology and archaeology, will be required to support a future planning application for the development of the Site. These will be conducted at the appropriate times to ensure that the relevant information is accurate and available to enable the consideration and determination of an application. It should be noted that Bellway Homes and Story Homes are working collaboratively to update some technical documents ahead of the Examination in Public of the emerging Local Plan.

3.9 Details from some of the surveys carried out to date are referenced in Section 4 of this Statement and have informed the proposed infrastructure provisions for each element of the emerging indicative masterplan proposals.

The Proposed Development

3.10 Bellway Homes and Story Homes' proposals for Burdon Hill will be familiar to the Council and have been provided indicatively in a Vision Document in 2014. This set out proposals for the delivery of a residential led scheme of approximately 1,500 dwellings including family and affordable homes with private garden spaces and substantial areas of public open space.

3.11 Bellway Homes and Story Homes has continued to refine the proposals for the Site in parallel to the Council's move towards a new Local Plan for the Borough. This has involved reducing the number of proposed dwellings to be delivered at the Site to approximately 1,250 new dwellings including appropriate provisions of market and affordable homes.

3.12 The indicative masterplan for the Site has been developed further to respond further to physical and technical constraints and opportunities set out in the Context Plan at Appendix 1 ensuring that:

- Site vehicle access is to be taken from Darlington Road (A1150) (including new east and westbound bus stops) and Tornado Way (B6279) via signalised junctions with a distributor road through the Site connecting the two accesses.
- Development is concentrated on the southern part of the Site to the south/ south east of Burdon Hill. A limited proportion of development is proposed to the north of Burdon Hill.
- Development avoids the western parts of the Site which lie in Flood Zones 2 and 3.
- The River Skerne corridor on the western edge of the Site will be protected and enhanced through Green Infrastructure provision including new linkages to the area.
- Local recreation and Green Infrastructure links surrounding Red Hall Local Wildlife Site will be strengthened.

- There are opportunities to strengthen vegetation along existing road corridors on the northern, eastern and southern boundaries in order to enhance green connectivity.
- Historic field boundaries will, where possible, be maintained.
- Appropriate easements for the existing gas pipe line, electricity pylons, water mains and sewers that cross the Site have been allowed for unless diversions are proposed.
- A buffer has been provided to the scheduled monument (a World War II bombing decoy control shelter) located in the north east part of the Site to improve interpretation and accessibility to it whilst conserving its setting.
- The historic route of the former Stockton and Darlington Railway along the southern boundary of the Site has been considered and incorporated into the emerging indicative masterplan proposal. This will enable interpretation and access to be provided as part of the proposals.
- The Public Right of Way (PRoW) which crosses the western part of the Site (north to south) and Buess Lane which crosses the eastern part of the Site (also north to south) have been accommodated in the emerging indicative proposals as part of an internal pedestrian connectivity network within the Site and to the wider surrounding network.

3.13 These proposals are consistent with the Council's stated requirements for development at the Site (Site 20) set out in Appendix B of the 'Darlington Borough Local Plan – Proposed Submission Local Plan 2016 – 2036' (August 2020).

3.14 It is acknowledged that the current masterplan proposals are still indicative. As the proposals are developed for a planning application in discussions with the Council and stakeholders they will continue to evolve and be improved upon. This will include providing greater detail on housing mix and locations, vehicular access and circulation arrangements, pedestrian connectivity routes, Green and Blue Infrastructure provision, and design principles.

3.15 Notwithstanding this, the current indicative masterplan (at Appendix 2) highlights the quality of the opportunity that exists at the Site for the Borough and the extensive technical and design work that has been carried out to date to demonstrate the deliverability of the proposals.

Land Ownership

3.16 The Site is currently under the control of a single landowner; Durham Cathedral. Bellway Homes and Story Homes have an agreement with Durham Cathedral to promote the Site for development.

3.17 Both Bellway Homes and Story Homes have strong track records of delivering residential development within the North East and other parts of the country. Our involvement is therefore a key attribute which will assist in ensuring:

- Early delivery of the Site as there are willing developers already involved who have undertaken significant work to-date to develop proposals.

- A high-quality development given the commitment to core planning and design principles.
- Complementary styles which will assist in place making and delivery rates for the Site yet ensure appropriate diversity.

3.18 The size of the proposed development will allow the delivery of a diverse range of house types including homes for first time buyers, family homes and a proportion of dwellings that accommodate a range of accessibility needs. It is currently envisaged that there would also be a proportion of affordable homes provided on-site.

4. Infrastructure Provision

4.1 This section of the Statement summarises the infrastructure provisions related to the Burdon Hill proposals.

Highways and Access

4.2 The proposed Burdon Hill development is bounded to the north by the A1150 (Darlington Road), to the south by the B6279 (Tornado Way) and bounded to the east by the A66.

4.3 Burdon Hill will be accessed to the north via a new junction formed with the A1150 (Darlington Road). At present this is proposed to be via a new signal controlled junction. The proposed southern access will utilise the existing signal controlled junction along the southern boundary of the Site.

4.4 The Site is located within the development corridor associated with an area wide assessment model developed by Darlington Borough Council and the Highways England. The model is aimed at providing an integrated approach to the delivery of physical improvements to the road network and sustainable travel in the area, to avoid a piecemeal approach associated with individual developments. The proposed development at Burdon Hill will embrace the collaborative approach associated with the model and will work with the Council and Highways England to deliver sustainable and equitable solutions as required to the strategic and local networks.

4.5 The proposed access arrangements will allow the provision of a north/south distributor link road through the Burdon Hill development which will be designed to standards to accommodate bus services. The introduction of such services will ensure that the dwellings within the development will have good access to public transport services to ensure that the majority will be within 400m of bus stops. At present the public transport services operate distinctly to the north and south of the site area. The link through Burdon Hill will provide the bus operators with an opportunity to expand existing services to serve this new sustainable community and to maintain services to the existing community. In the short-term bus stops on the east and west bound carriageways of the A1150 are proposed as part of the initial junction works for the northern Site access.

4.6 The development will establish strong links with the existing pedestrian and cycle infrastructure surrounding the Site. The external links will connect with internal greenway infrastructure to ensure excellent permeability within the development, designed to encourage integration with and between the existing communities. In particular, the enhancement of Buess Lane as a north-south greenway will not only link the development to the surrounding pedestrian-cycle network, it will also provide benefits to the wider community. Buess Lane will connect the two existing east-west cycle routes to the north and south of the Site; the route to the south is part of the National Cycle Network (Route 14). The enhancements of connections to the Red Hall Local Wildlife Site and the River Skerne corridor as well as the improvement of the existing PRoW running north/south through the Site will all be benefits of the development.

4.7 The development has been assessed and shown to be accessible to existing facilities in the surrounding area. The Burdon Hill development is within acceptable walking and cycling distance of the following existing facilities:

- Education: Primary and Secondary Schools;
- Convenience shopping;
- Doctor and Dental Surgeries;
- Employment Opportunities; and
- Public Transport.

4.8 In a wider context the A66 forms part of the strategic road network. The road is of regional and national significance, providing an east-west link to the A1 and the A19, which in turn provide direct connections to Tyneside and Scotland to the north and to North Yorkshire and the south and midland regions of England to the south. Darlington Rail Station, located within Darlington Town Centre, is part of the East Coast Mainline railway, and provides direct services to destinations including Newcastle, London, Edinburgh and Aberdeen. There are also First Trans Pennine Express rail services to Manchester and Liverpool.

4.9 Durham Tees Valley Airport is located to the south-east of the Burdon Hill development, providing flights to various destinations within Europe.

4.10 The Site is situated in a location that makes it possible to utilise the existing infrastructure in the area to encourage and enhance the use of sustainable modes of travel whilst providing access to the local, regional and nationally significant strategic road network and mainline rail services.

Education

4.11 Burdon Hill is located within sustainable distances of primary education provision at Whinfield Primary School (north west of the Site), and Red Hall Primary School (west of the Site), as well as Springfield Academy – The Education Village (west of the Site). Secondary education provision is located at Houghton Academy which is also part of The Education Village located to the west of the Site.

4.12 It is proposed that financial contributions in line with the provisions set out in emerging Policy IN 10 of the Local Plan will be made towards any necessary creation of additional capacity at these schools. Contributions would be made on a phased basis as required given the scale of proposed development at Burdon Hill.

Health

4.13 Whinfield Medical Practice is located to the north west of the Site and providing local GP surgery access. It is also noted that the proposed Skerningham masterplan envisages a Health Hub being located as part of the Skerningham proposals to the north of the Site.

4.14 Should there be any evidenced and demonstrable need for financial contributions towards enhancements to capacity of existing local medical services these will be considered during discussions with the Council in developing proposals for the Site.

Green Infrastructure

4.15 The Site has been assessed for its key landscape and visibility characteristics. It is an area of pastoral and arable farmland on the eastern edge of Darlington with a relatively poor tree and hedgerow pattern. The line of the River Skerne marks the Sites western boundary; other boundaries are formed by a network of roads (A1150, A66 and the B6279 that form three sides of a rectangle. The landform pattern of the Site is a distinctive feature of the site. The western boundary lies in the flood plain of the River Skerne (at approximately 44m AOD); the land then rises in an undulating pattern to a local high point in the northern and central part of the site (at approximately 64m AOD); levels then fall to the north, east and south.

4.16 The Site is currently accessed from the A1150 entrance to Great Burdon Farm and from a gated entrance from the B6279. A track from Great Burdon Farm runs southwards and then eastwards to link with another north-south track called Buess Lane. A bridleway connects the village with Red Hall. Significantly the line of Bridleway 61 in Darlington runs along the site's southern boundary, connecting the centre of the town with the South Burdon Community Woodland.

4.17 The Site falls within the Tees Lowland National Character Area and exhibits many of the characteristics of that landscape, being:

- Gently undulating low lying land;
- With visible urban and industrial development;
- With pylons and overhead power lines;
- With sparse woodland cover;
- With a distinctive lowland along the line of the Skerne;

4.18 The Site is visible from residential areas of Great Burdon, Haughton le Skerne and Red Hall. It is also visible from the A1150, A66 and B6279 roads.

4.19 The line of the River Skerne is identified as a Wildlife Corridor and Green Wedge in the Tees Valley Green Infrastructure Strategy.

4.20 The River Skerne is identified as a part of the Strategic Network of Green Infrastructure for the Tees Valley as follows:

- Darlington, Middleton St George, A66/67 Corridor to Stockton
- A potentially major corridor linking with the River Skerne Corridor in Darlington via the SUSTRANS route towards Middleton St George.

4.21 The key landscape issues arising from any development proposal on the Site are as follows:

- Avoiding the floodplain;

- Creating an attractive edge to the River Skerne corridor;
- Responding to the distinctiveness of Great Burdon;
- Significantly enhancing the woodland, tree and hedgerow structure of the Site;
- Enhancing the high point within the Site as a green space;
- Retaining key features of the old, agricultural landscape structure of the Site;
- Enhancing public access;
- Enhancing landscape character;
- Enhancing habitat value;
- Making the development a significant enhancement of the green infrastructure of Darlington and the River Tees.

4.22 The principal landscape and visual mitigation features arising from a proposal to construct housing on the Site are subordinate to the landscape, recreation and biodiversity opportunities that good masterplanning can provide. For, correctly considered, the need to retain and enhance the flood capacity of the River Skerne whilst designing a new community according to best design practice creates a generational opportunity to see a significant enhancement of the landscape setting, public open space facility and nature conservation value of this eastern part of Darlington.

4.23 The indicative masterplan has developed three landscape led ideas for the Site:

- The retention and enhancement of the flood plain as the Skerne River Meadows;
- The containment of the built development within a structure of accessible planting that will, over time, contain and hide views of housing, while increasing the bio-diversity value of woodland, tree and hedgerow cover on the Site;
- The retention of the idea of a high point of open ground on the Site by a considered increase of the Sites current higher ground; and the fixing of this as a focal point in a number of key view corridors.

4.24 These simple but powerful ideas contain a potential to transform the pattern of public open space and access on the eastern edge of Darlington, with a major increase in area, use and management for landscape, recreation and biodiversity purposeswith appropriate new woodland, tree, shrub, hedge and meadow planting. The developments landscape proposals will make the link between an old parkland asset of Darlington and its newest: between the Skerne Corridor and South Burdon Community Woodland.

4.25 Such a Green Infrastructure strategy will more than mitigate any short term visual impact from the construction and early years of the scheme and for the longer term substitution of residential land for arable agriculture.

Ecology

4.26 Extensive ecological work has been undertaken over a prolonged period at the Site identifying only a limited number of features of ecological importance which need to be taken into account.

4.27 Key features within the Site are:

- Small number of birds of high conservation importance, such as skylark and yellowhammer;
- A few habitats that are of principal importance (as defined under the Natural Environment and Rural Communities Act 2006), in particular hedgerows and ponds;
- A small number of mature trees that may be used by roosting bats.

4.28 Key features outside of the Site area:

- The River Skerne corridor to the west, which forms part of the green network that is identified in the Council's Green Infrastructure Strategy;
- An unnamed watercourse adjacent to the southern boundary of the Site providing a link with the River Skerne;
- Red Hall Nature Reserve (also a Local Wildlife Site), which is recently created outside the southern boundary of the Site where new ponds are located.

4.29 It is noted that the Council's Green Infrastructure Strategy and Local Plan proposes to designate Red Hall Nature Reserve as a Local Nature Reserve. The proposed habitat creation within the Site will ensure that the Nature Reserve links up with habitats within and outside the Site, resulting in a much stronger habitat network.

4.30 Ecology will be protected and enhanced by undertaking the following where possible:

- Protection and enhancement of the River Skerne corridor and floodplain which could be utilised to accommodate any potentially displaced birds;
- Protection and enhancement of the unnamed watercourse corridor which could also be utilised to accommodate any potentially displaced birds and to maintain a habitat corridor that links Red Hall Nature Reserve to the River Skerne corridor;
- Replacement of any ponds and hedgerows which will be removed elsewhere on Site as part of the landscaping proposals;
- Retention of mature trees, particularly those along the green land that runs from north to south across the northern part of the Site being proposed as a corridor within the Council's Green Infrastructure Strategy;
- Providing a buffer along the southern edge of the Site adjacent to the Red Hall Nature Reserve.

4.31 Immediately to the east of the A66 is the South Burdon Community Woodland which is another area of accessible green space. There is scope for the development to include

recreational opportunities such as green infrastructure to provide a circular walking route or dedicated walking areas and this can be explored further.

4.32 The work carried out for the Site demonstrates that it has very few ecological features, all of which can be mitigated and enhanced. There is considerable scope to ensure that delivering approximately 1,250 new homes results in achieving net gains for nature conservation in accordance with paragraph 170 of the NPPF.

Noise

4.33 Noise survey and assessment work has been carried out on Site to assess the noise levels resulting from road traffic on the A1150, A66 and B6279. Attended noise measurements were taken at various monitoring locations.

4.34 The results of this work indicated that to achieve an acceptable outdoor amenity some form of acoustic mitigation would be required for any proposed outdoor living areas facing or with direct line of sight of the A1150, A66 and B6279. However, where gardens are located on the screened sides of dwellings it is unlikely that any noise mitigation will be required.

4.35 With regards to achieving acceptable internal noise levels in living room and bedroom areas, the use of standard thermal double glazing in a solid brick or blockwork façade has been assessed as being sufficient. The implementation of such glazing would ensure that internal noise levels are met in living rooms and bedroom areas across the Site with the windows closed. However, it is noted that acoustic ventilation would be required within habitable rooms located nearest to, and with a direct of sight of the A1150, A66 and B6279, to enable the windows to remain closed.

4.36 The facades and garden areas of any dwellings further into the site are likely to be protected by other more peripheral buildings.

4.37 The noise survey and assessment work carried out demonstrates that acceptable internal and external noise levels can be achieved at the site through appropriate mitigation and scheme design. This will ensure that there would be no detriment to the amenity of future residents from noise sources external to the site.

Flood Risk and Drainage

4.38 The Site is within Environment Agency Flood Zones 1, 2 and 3. The River Skerne flows along the western boundary of the Site and flood risk is fluvial, caused by overspill of water from the river channel onto low lying land to the east and west of the River Skerne. In accordance with the NPPF and Environment Agency guidance, development of residential dwellings and community facilities will only be considered within Flood Zone 1 (areas which have a flood risk of 1 in 1,000 years or greater from fluvial sources).

4.39 The development of the western of the Site will be restricted to appropriate uses for Flood Zones 2 and 3, as required by NPPF. These uses will include the creation of wildflower meadows, wetlands, and public open landscape.

4.40 The development will be designed to ensure that there will be no net increase in surface water flows to the river and surface water from the development will be restricted to pre development 1 in 1 year Greenfield rates, via SuDS attenuation ponds and wetlands created as part of the landscape area. The creation of SuDS areas will allow surface water from the development to be treated naturally in accordance with SuDS guidance, to ensure that water quality is maintained or even enhanced from the current use.

4.41 In addition to the attenuation of flows, wetland areas and ponds will add to the ecological diversity of the open space.

4.42 Surface water from the development will be designed in accordance with the drainage hierarchy in Building Regulations, SuDS guidance and Sewers for Adoption. The sewer network will be adopted and maintained by Northumbrian Water Ltd on completion.

4.43 Due to ground conditions attenuation of surface water flows will be achieved via ponds/wetlands within the open space area. Landscape and ecological benefits will be maximised via the input of an appropriate specialist landscape and ecological consultant, and guidance within the SuDS Manual will be used to achieve water quality and safety objectives.

4.44 Water discharged from the Site will flow via a series of swales to the ponds where sufficient capacity to store up to the 1 in 100 year plus climate change rainfall event will be designed. The attenuation ponds will flow into tributary watercourses of the River Skerne at a controlled rate equivalent to current 1 in 1 year greenfield rates.

4.45 Foul flows from the development will outfall to the existing foul network with connection points, subject to phasing, into the 825mm diameter foul sewer running along the western bank of the River Skerne, or alternatively a connection into the 450mm diameter foul sewer which runs within the landscape open space to the north of Red Hall Estate. Discussions are ongoing with Northumbrian Water Ltd in terms of likely connection points and development phasing.

Utilities

4.46 Service utility plans have been obtained for the surrounding area and discussions with utilities regarding the means of providing services to the development are ongoing.

Electric

4.47 There are two electric overhead lines within the Site. A 132 KV line runs diagonally across the Site south west to north east on pylons. The emerging proposals for the Site respect the line of the existing lines as a constraint to development. A 6KV overhead line runs parallel to Darlington Road within the Site. This cable could be placed underground through the northern development cells along a route to be agreed with the operator.

4.48 The development will be supplied via the HV network with a series of sub stations which will be located within the development.

Gas

4.49 There are two intermediate pressure gas mains running through the northern development cell east of Great Burdon Farm. The majority of the gas main route is within land designated as land at risk of flooding and will not be affected. The intention is to divert the mains along new estate roads through the northern development cells in agreement with Northern Gas Networks.

4.50 The Site would be supplied via a low pressure mains network supplied from a gas governor house from the intermediate pressure mains.

Water

4.51 There is a 600mm diameter trunk water main within the northern verge of Darlington Road with smaller distribution mains within Great Burdon and Red Hall Estates.

4.52 The development will be supplied via an extension of the distribution main system from the 600mm diameter trunk main to the north subject to phasing and discussion with Northumbrian Water.

Telecoms

4.53 There are existing telecoms network within Darlington Road to the northern boundary and also Red Hall Estate.

4.54 The development can be served by an extension of the existing network from both the north and the south.

5. Site Deliverability

5.1 This section of the Statement considers the deliverability and potential approach to phasing for the Burdon Hill site. Whilst this information is indicative at present, as the proposals for the Site are developed with more detailed information it will be possible to refine the approach to the delivery of the Site.

Deliverability

5.2 Bellway and Story Homes have established track records in delivering high quality residential development with successful schemes. Within the Borough Bellway Homes currently has developments at Hurworth and Heighington, and Story Homes currently has developments at Blackwell Grange and Middleton St George.

5.3 Both Bellway Homes and Story Homes can confirm that the Site is developable in the short-term because it is:

- **Available** - land at the Site is under the control of Bellway Homes and Story Homes as willing developers with an existing agreement in place with the landowners as set out in Section 3. The Site is not subject to any significant legal or ownership constraints, such as ransom strips or tenancies, which might be obstacles to early delivery of dwellings. Therefore, the Site is 'available' for development now.
- **Achievable** – the Site is located in a good market area with high demand for new homes. The Site is also largely free from any environmental or technical constraints and there are none which would preclude development coming forwards.
- **Suitable** – the Site is in a sustainable location within the emerging settlement boundary of Darlington and offers the potential for good transport connections to services and employment opportunities in the surrounding urban area. It was accepted as a suitable location in being partly included within the Eastern Urban Fringe strategic development location in the adopted Core Strategy (2011) and in subsequent Strategic Housing Land Availability Assessments.

5.4 The development opportunity at Burdon Hill is deliverable and capable of contributing new homes quickly subject to the grant of planning permission. The involvement of two respected developers should provide the Council and stakeholders confidence that the scheme can begin to be developed in the short term and in a high-quality manner.

Delivery Trajectory

5.5 Bellway Homes and Story Homes wish to progress with development at the earliest opportunity at Burdon Hill and are in the process of preparing a planning application for the entire Site.

5.6 At present the application is proposed to be a hybrid planning application with some parts in detail and some in outline. It is envisaged that there would be elements of residential development and highways infrastructure in the north and also in the south

along with Green Infrastructure in west of the Site submitted in detail, with the remainder of the Site to be considered in outline. This approach would:

- facilitate early delivery of homes and infrastructure; and
- allow flexibility for the future phases of delivery consistent with a holistic approach to the principle of the development of the Site.

5.7 It is hoped that a hybrid planning application could potentially be submitted in Spring/Summer 2021 and would run in parallel to the preparation of the Local Plan. This would provide further certainty to the Council about Bellway Homes and Story Homes' commitment to the Site and its deliverability.

5.8 It is envisaged that the hybrid planning application would potentially be determined soon after the Local Plan is anticipated to be adopted in Summer 2022. There would then need to be a period allowed for the discharge of relevant pre-commencement conditions and obligations prior to the commencement of development.

5.9 Given the scale of the proposals it is considered appropriate to allow an 18 month lead in period from the submission of the hybrid planning application until a site start occurs. This would mean a site start potentially in late 2022 or early 2023.

5.10 Allowing for a lead in for initial Site preparation and infrastructure works it is estimated that the first occupations of dwellings could potentially occur in Autumn 2023. This is earlier than currently projected in Appendix A of the 'Darlington Borough Local Plan – Proposed Submission Local Plan 2016 – 2036' (August 2020) which anticipates delivery beginning in 2027.

5.11 With regards to the projected delivery rates on the Site Appendix A of the 'Darlington Borough Local Plan – Proposed Submission Local Plan 2016 – 2036' (August 2020) anticipates that there would be delivery of 50 dwellings per annum (dpa). This is considered to be conservative and could be exceeded due to the good market location of the Site and if additional outlets are added to the Site.

5.12 Based on this earlier start on-site and 50 dpa delivery it is estimated that during the Plan period to 2036 Burdon Hill has the potential to deliver at least 625 dwellings rather than the 500 dwellings set out in the emerging Local Plan Policy H 2. Should any additional outlets be added to the wider Site then this would increase the delivery rates further.

Infrastructure Phasing

5.13 The development of Burdon Hill will involve the delivery of enabling infrastructure including highways improvements, site accesses, utilities, Green Infrastructure, and pedestrian/cycle connections. The delivery of this infrastructure will be phased throughout the development of approximately 1,250 dwellings to ensure infrastructure is in place when it is needed whilst ensuring a viable scheme.

5.14 Notwithstanding this, it is possible to set out an indicative delivery programme based on the potentially anticipated delivery trajectory for the Site set out above. This involves phasing delivery of new infrastructure throughout the build programme for the Site.

5.15 The precise timing of the delivery of infrastructure will be agreed with the Council through the consideration of the hybrid planning application for the Site. This will be dependent on a variety of factors including viability, infrastructure needs, delivery programme and partners, and external funding opportunities.

Figure 5.1: Estimated Indicative Delivery

Period	Total Approx. No. of Dwellings per Phase (and Overall)	Indicative Infrastructure Delivery
2022/23 – 2030/31	375 (375)	• Junctions onto the A1150 and B6279. • Off-site highways improvements to local and strategic road network. • SuDS for appropriate phases. • Utilities connections into the Site from the north and south, utility diversions in northern part of the Site, and sub-stations and any gas governors as required. • Enhancement of Buess Lane. • Initial Green Infrastructure improvements in the west of the Site including the River Skerne corridor, connections to Red Hall Local Wildlife Site and pedestrian/cycle connections. • Enhancements to the planting of the northern and southern boundaries of the Site to the A1150 and B6279. • Ensuring connections are made to the former Stockton and Darlington Railway to the south of the Site. • Phased contribution towards local education and health provision as necessary.
2031/32 – 2039/40	450 (825)	• Provision of entire distributor road through the Site. • Contribution towards new/extended bus services through the Site. • SuDS for appropriate phases. • Sub-stations and gas governors as required • Enhancement of PRoW running north/south through western part of the Site. • Further Green Infrastructure improvements in the west of the Site and along retained field boundaries in the centre of the Site. • Enhancements to the planting of the eastern boundary of the Site to the A66. • Phased contribution towards local education and health provision as necessary.
2040/41 – 2048/49	425 (1,250)	• SuDS for appropriate phases. • Sub-stations and gas governors as required • Further Green Infrastructure improvements in the west of the Site and along retained field boundaries in the centre of the Site. • Phased contribution towards local education and health provision as necessary.

5.16 Bellway Homes and Story Homes will continue to liaise with the Council to discuss the infrastructure requirements and delivery for Burdon Hill to secure agreement on the core infrastructure principles involved.

6. Summary and Conclusions

6.1 This Statement demonstrates that Burdon Hill represents both a 'deliverable' sustainable site for high quality housing in Darlington and could provide in the region of 1,250 dwellings. It will offer an excellent opportunity to provide residential development in a landscape-led scheme which will offer:

- A range of high quality market and affordable homes which will contribute to addressing the local housing needs of Darlington.
- Contribute to improvements in the capacity of the strategic and local highway network including through the introduction of the new site accesses and distributor link road between Darlington Road (A1150) to Tornado Way (B6279).
- Bus connectivity through the introduction of services within the development to provide sustainable transport opportunities.
- Improvements to pedestrian/cycle connectivity within the Site and to the wider surrounding local networks.
- Accessible Green Infrastructure enhancements including along the River Skerne corridor in the west of the Site; enhanced vegetation on the site boundaries, and improved connections to the Red Hall Local Wildlife Site.
- Improvements to local infrastructure such as schools and health provisions as required.
- Sympathetic treatment of key landscape and heritage features within and surrounding the Site.

6.2 Consideration has been given to the need for associated education and health facilities and appropriate financial contributions towards appropriate new and enhanced local provisions will be made through appropriate mechanisms.

6.3 Whilst substantial work has been undertaken in respect of the deliverability of the Site further detailed work is still required in order to determine the precise scale and nature of infrastructure that the Burdon Hill proposals. These details will be considered through the preparation of a hybrid planning application for the Site.

Appendices

Appendix 1
Indicative Site Context Plan

Appendix 2
Indicative Proposed Masterplan

Tom Baker
E: tom.baker@savills.com
DL: +44 (0) 191 323 3144

71 Grey Street
Newcastle upon Tyne NE1 6EF
T: +44 (0) 191 917 1444
savills.com

Dear Sirs

REPRESENTATIONS TO DARLINGTON REGULATION 19 DRAFT LOCAL PLAN ON BEHALF OF STORY HOMES

These representations are prepared by Savills UK Ltd on behalf of Story Homes.

Story Homes are a medium sized housebuilder with 30 years' experience of delivering high quality aspirational housing in Cumbria, the North East, Lancashire and Scotland. Story Homes have successfully delivered several schemes in the Borough of Darlington including Paddocks View in Middleton St George and The Willows in Blackwell.

Story Homes continues to invest in the Borough and these representations provide constructive comments on the emerging Darlington Local Plan ('eDLP') and the changes necessary to ensure the Borough continues to grow.

Story Homes is promoting three sites through this local plan process; Great Burdon (Allocation 020); Middleton St George (Allocation 099) and Hurworth on Tees (Unallocated).

This letter responds specifically to the Regulation 19 Draft of the eDLP. Where necessary it makes recommendations regarding the soundness of the plan. It is accompanied by a site specific representation for a sustainable extension to the village of Hurworth on Tees and supportive representations for Allocation 020 (Great Burdon) and Allocation 099 (Middleton St George).

Story Homes' Representations to the eDLP

Policy SH1 Settlement Hierarchy

Policy SH1 is the strategic policy which describes the role of the different settlements in the Borough of Darlington and the hierarchy in which they sit. It describes three tiers within the hierarchy; Darlington Urban Area, Service Villages and Rural Villages.

Our client is promoting three sites in the Borough. The first site at Great Burdon sits adjacent to the built up area of Darlington itself (allocation 020) and once developed would become part of the Darlington Urban Area, maintaining the town's *'role as a leading sub-regional centre for transport connectivity, services, employment and retail and leisure.'*

The other sites are located on the edge of the Service Villages of Hurworth (an unallocated site) and Middleton St George (allocation 099).

Policy SH1 states that Service Villages should be *"maintained"* to ensure that they continue to *"offer a range of facilities and services*" that *"meet local needs and facilitate the economic diversification of rural areas."* Our client supports the recognition of the valuable role that Service Villages play in supporting the sustainability of local communities but considers that the policy should contain a stronger recognition of the role of spatial planning in the vitality of these settlements.

Hurworth and Middleton St George have most of the services which local people need on a day to day basis including primary and secondary schools, convenience retail, restaurants, cafes, formal parks, churches, village halls, doctors, dentists and public transport (Middleton St George also has a train station). The future success of these settlements is critical to the future viability of these services and the future sustainability of the communities that rely on them.

The NPPF (paragraph 78) advises that *"housing should be located where it will enhance or maintain the vitality of rural communities"* (Savills emphasis). It states that "*Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."* (Savills emphasis)

Our client considers that the wording of Policy SH1 should be stronger to recognise the importance of growth in these settlements and to put in place a requirement for the local authority to maintain the vitality and services of these villages specifically. Without these amendments the policy is too ambiguous about the role of the local plan in maintaining the status of these villages within the settlement hierarchy. Paragraph 4.0.9 of the Regulation 19 Local Plan recognises that the Borough's villages need growth to survive, *"whether it be by retaining services or supporting new development, such as affordable housing, that help to maintain sustainable communities".* Furthermore, the 'Proposed Submission Local Plan Sustainability Appraisal (August 2020) confirms (Table 3.3) that a shortfall of housing and affordable housing provision in rural areas is a key sustainability issue.

Settlement Hierarchy (Strategic Policy)

1. **Service Villages (Heighington, Hurworth and Middleton St George)** – The vitality of these villages will be maintained ~~as villages~~ to ensure that they continue to offer a range of facilities and services. ~~where a level of~~ Development will be supported where it meets ~~local~~ the needs of the village and the local area and facilitates the economic diversification of rural areas. Development should safeguard and reinforce the distinctive character of each settlement and not detract from their landscape setting;

Story Homes considers that the villages of Hurworth and Middleton St George can play an important role in meeting the housing needs of the wider rural areas in a sustainable manner which protects the vitality of these settlements as well as their services and facilities. Any shortfall in market and affordable housing in the rural areas can be met within these Service Villages.

Policy DC1 Sustainable Design Principles

Policy DC1 sets out the Council's design policies including its requirements for low carbon technology. The policy states (DC1c) that *"energy efficiency measures and low carbon technologies will be encouraged"* and that development will need to demonstrate how (DC1b) *"buildings have been made energy efficient and how measures have been implemented to reduce carbon emissions."*

Story Homes provides its customers with efficient and sustainable homes including energy efficient lighting systems, water saving appliances and thermally insulated walls and roofs all of which reduce the energy demands of their homes. Story Homes' product meets all building regulation energy efficiency standards. Whilst we support measures to ensure the development of high quality sustainable homes in the Borough, our client has significant concerns about Policy DC1 as currently drafted.

The policy requires all new development to follow the design principles of the Darlington Design of New Development Supplementary Planning Document (SPD) (July 2011 or subsequent replacement). The purpose of an SPD is to provide additional explanatory detail around a policy requirement in a local plan. The July 2011 SPD was prepared to support the policies of the Core Strategy (adopted May 2011) and contains explicit references to its policies. For example, the SPD requires all residential development from 2016 to achieve Code for Sustainable Homes rating 6 (page 18) and sets minimum renewable and low carbon targets for residential development (page 18). The SPD requires each new development to undertake a 'renewable energy matrix' (Appendix 5 of the SPD) which provides exact calculations for renewable energy requirements and states that it will be updated to take into account changes in building regulations, albeit no updates have been made and the document remains extant. Reference to initiatives in the SPD such as Code for Sustainable Homes is confusing when the emerging Local Plan (paragraph 5.1.10) states that *"the code has been phased out as part of the Government's wider review of housing standards".*

Our view is that the SPD is out of date and the reference to it in the Regulation 19 Local Plan would be unsound because the SPD is not effective, justified or consistent with national planning policy. Furthermore, the SPD contains many energy requirements which are likely to affect the overall viability of development across the Borough when combined with other policy requirements. A new SPD should be prepared which is consistent with this local plan (and is fully viability tested) and current national planning policy and reference to the preparation of this SPD can be made in the explanatory text to Policy DC1. Below we set out the changes required to address this issue:

Good design is required to create attractive and desirable places where people want to live, work and invest. Good design will help to reduce carbon emissions and increase the resilience of developments to the effects of climate change. All development will be required to ~~follow the design principles of the Darlington Design of New Development SPD by demonstrating~~ demonstrate that:

a. Energy efficiency measures and low carbon technologies will be encouraged, where possible and viable and where this does not result in harm to the significance of a heritage asset;

Policy DC2 - Flood Risk and Water Management

Policy DC2 sets out the requirements of development regarding flood risk, drainage and water quality. Our client's concern regarding this policy relates to the wording around the requirements for mitigation. Currently the policy requires any risks from the construction or proposed use of the site on ground water or surface water to be mitigated. Risk is a compound measure of both probability and severity and therefore not all risks are the same. Some risks are more severe than others and some have a greater probability of occurring. The requirement to mitigate any risks is in our view not justified or consistent with the flexbility required by paragraph 11 of the NPPF. The policy therefore requires the following amendment to ensure that mitigation is required where the risk is a reasonable in nature the proposed development:

New developments should make an assessment of and address via mitigation measures where required, any reasonable risks from the construction and proposed use of the site to underlying groundwater, watercourses and other surface waters, in order to protect these resources and prevent contamination.

Policy DC3 Health and Wellbeing

Our view is that the requirement for a full Health Impact Assessment ('HIA' in line with DHSC guidance) for developments of over 100 dwelling or other 'major development' is too onerous. A full HIA involves in-depth evidence-based analysis of all potential health and wellbeing impacts on different population groups, using research and community engagement. To require this at the

planning application stage will be a significant burden on the planning process, will delay the preparation and submission of planning applications and is unnecessary for the majority of the schemes. This is not a proportionate policy requirement and is not justified.

In the majority of local plan allocation sites, the health and wellbeing impacts will have been assessed through the emerging development plan process including the Sustainability Appraisal. In some cases there may be a need to look more closely at the impacts once an application has been submitted but this should be done in a proportionate approach. For example, the NHS's Health Urban Development Unit[1] in London states that there can be three 'levels' of HIA assessment; full, rapid or desktop. A desktop HIA for example, is described by the Unit as a series of questions based on local health and wellbeing policy requirements and standards which if met can positively influence health and wellbeing. This level of HIA for example could be delivered through the planning statement or design and access statement.

Whilst we recognise that some major infrastructure projects (airports) and regeneration programmes (estate renewal schemes) will require full HIA, the majority of schemes will have been adequately assessed through the local plan or can be appropriately assessed through a desktop assessment of the health and wellbeing effects of the scheme assessed through existing validation documentation (planning statement for example). We therefore consider that to the make the policy sound the following amendments are required to Policy DC3:

Health and Wellbeing

Require, in the case of development of 100 or more homes and all other 'major' development, the consideration of health and wellbeing impact and a statement showing how these been considered and mitigated through the planning process. Environmental Impact Assessment development may require the submission of a Health Impact Assessment (HIA) as part of the application to explain how health considerations have informed the design. This will be determined through the ES Scoping, pre-application or validation process.

Policy H1 Housing Requirement

Our client supports Policy H1 which sets out a minimum requirement of 422 dpa and an increased housing target of 492 dpa to meet the Council's growth targets. The Council is required by the NPPF (paragraph 60) to base its local housing need calculation on the standard methodology as set out in the planning practice guidance *"unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."*

Furthermore whilst the local housing need figure should be the starting point for strategic policy-making, the PPG[2] states that a higher housing need figure than that derived by the standard methodology should be considered:

- Where additional growth above historic trends is likely to or is planned to occur over the plan period;
- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth;
- Where strategic infrastructure improvements are planned that would support new homes;

[1] https://www.healthyurbandevelopment.nhs.uk/our-services/delivering-healthy-urban-development/health-impact-assessment/

[2] Paragraph: 010 Reference ID: 2a-010-20180913

- Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground; and
- Where previous delivery has exceeded the minimum need identified and this is indicative of greater housing need.

The PPG also states that where a recent SHMA suggests higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified.

The Strategic Housing Market Assessment (2017) that supports the housing requirement and target demonstrates that the 2014 Household Projections are flawed in Darlington and cannot therefore be relied upon.[3] These are the same projections that support the standard methodology and demonstrate that it would not be appropriate to use the standard method in Darlington.

The SHMA therefore produces its own projection based on a long term migration scenario using data from the ten year period leading up to the start of the eDLP Plan Period (2006 to 2016).[4] This approach is justified and in line with the requirements of paragraph 60 of the NPPF which requires an alternative approach to reflect current and future demographic trends. In terms of market signals, the 2017 SHMA concludes that house prices, affordability and rental prices do not justify increasing the housing number, but the SHMA does make an adjustment for concealed families to reflect the growth in this indicator of overcrowding[5]. Again, this is consistent with the requirement of paragraph 60 of the NPPF which requires an alternative approach to 'reflect market signals'. Furthermore the SHMA includes an adjustment for older persons housing (typically in institutional homes) due to a local plan ambition (Paragraph 5.3.1 of the eDLP) to keep older people in their own homes. Again this accords with the PPG which states that planning for the housing needs of older people is a requirement of planning policy.[6] Taking these adjustments together it results in a need for 422 dpa – the minimum requirement for Policy H1.

Furthermore we support the Council's job target of 7,000 jobs (taken from the Tees Valley Strategic Economic Plan) and the Council's housing 'target' to reflect this – 492 dpa. The PPG states that a higher housing figure can be considered where there is a growth strategy in place and this part of planning guidance supports Policy H1's housing target. Furthermore the PPG states that if a number goes above the minimum need the assumption is that it is sound.[7]

Our client supports the recognition in Policy H1 that where there is no five year housing land supply, sustainable sites beyond the settlement limits, including in Service Villages, will be supported. As discussed, our client is promoting sites on the edge of the Service Village of Hurworth (an unallocated site) which is suitable, available and achievable (see separate representation on the Hurworth site for more detail).

Our client supports the housing requirements for Hurworth and Middleton St George but would like it clarified that these figures are a minimum not a ceiling. Hurworth and Middleton St George are sustainable service villages with education, retail, leisure, community uses, health facilities and public transport. Their continued growth should be supported going forward through the plan.

One of the principles espoused by paragraph 78 of the NPPF is that a settlement is not an island and that growth in one settlement can ensure the future sustainability of a wider rural area. This is very much the case in Hurworth where the Service Village has an important role in delivering services to the residents of smaller villages including Croft on Tees and Neasham. It is critical that this role is not hindered by the Local Plan and that sufficient housing allocations are identified to meet the needs of these important smaller settlements and rural areas.

[3] Paragraph 2.15 of the 2017 SHMA
[4] Paragraph 2.22 and 2.31 of the 2017 SHMA
[5] Paragraph 3.37 of the 2017 SHMA
[6] Paragraph: 001 Reference ID: 63-001-20190626
[7] Paragraph: 015 Reference ID: 2a-015-20190220

Housing Requirement (Strategic Policy)

The NPPF states that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The table below outlines the minimum housing requirement for the neighbourhood areas in the Borough, following the above approach.

Policy H2 Housing Allocations

Our client supports the following housing allocations (identified in Table 6.3);

020 – Great Burdon (strategic)

Our client's allocation sits on the eastern edge of Darlington. The site is located approximately 2.5 miles to the east of the town centre in close proximity to the existing area of Great Burdon. The site has a range of services within walking and cycling distance including ; Whinfield and Red Hall Primary Schools; Springfield Academy (primary); Haughton Academy (secondary); supermarkets at Asda and McColls; Whinfield Medical Practice as well as Lingfield Point employment and mixed-use area.

The site is free from constraints which would affect its deliverability. There are multiple access options which could be implemented. The site does not flood, it is not protected in terms of heritage, ecology or landscape.

There are a number of bus services (X66 and 11) which operate in the vicinity of the site along the A1150, Stockton Road, Winchester Way, McMullen Road and Coombe Drive offering a range of accessible services close by. New bus stops could be provided to the north to access eastbound and westbound services along the A1150, Stockton Road. Existing bus stops within the Redhall Estate will be accessible from the south west of the site.

The site is being promoted by two established house builders with a track record of delivering houses in Darlington (Story Homes and Bellway Homes). These house builders have confirmed that the proposed allocation is deliverable and the indicative yield over the plan period can be delivered. The site offers an excellent opportunity for a sustainable urban extension with housing, education, open space and the potential for other facilities.

A site specific representation is being prepared by Barton Wilmore on behalf of Bellway Homes and Story Homes and additional technical information can be found within that documentation.

099 – Maxgate Farm, MSG at Policy H2

Middleton St George is a sustainable service village which will be supported by the provision of new housing. The village has a range of services including a primary and secondary school, train station, cricket club, allotment gardens, shops and health services. We note that there are potential capacity issues in the local school and therefore the option exists for additional education provision on our client's site.

The site is located on the edge of the village within walking distance of the aforementioned services. Story Homes have a live planning application with the Council demonstrating our client's commitment to the site (16_00976_OUT) and as part of that application have undertaken a range of technical surveys which conclude that there are no constraints which would preclude the site coming forward for development, specifically;

- An ecological impact assessment, bat survey, great crested new survey and breeding bird survey conclude that the development of the site will have no adverse impacts on protected species;

- An archaeological desk based assessment demonstrates that archaeology is not a constraint to development;
- A transport assessment demonstrates that the proposals can be accessed safely and have no severe impact on the highway network;
- All utilities have been taken into account and can be addressed through the design and construction of the scheme

Our client's submission of a planning application for the site demonstrates its commitment and belief that the site is deliverable over the next five years, and can contribute towards the Council's five year supply. We therefore support the allocation and consider that it is sound.

A site specific representation is being prepared by Fairhurst on behalf of Story Homes and additional technical information can be found within that documentation.

Land north of Neasham Road, Hurworth

Our client considers that the site 'land north of Neasham Road' in Hurworth should be allocated in the eDLP to meet the housing needs of Hurworth village over the plan period. This is discussed in detail in the accompanying site-specific representations which conclude that the site provides a unique opportunity to deliver an aspirational development on a sustainable and visually attractive landscaped site.

The previous 2017 HELAA, which concluded that the site was **suitable, available and achievable,** demonstrated that there would be no technical constraints to development and any issues can be reasonably mitigated against. The absence of technical constraints also means that delivery on the site would not be delayed. The site is readily available, with a realistic prospect of delivery within 5 years in accordance with the definition in the PPG. The site is in a strong and established residential market and therefore can contribute to Darlington's housing targets and the economic objectives set out in the plan.

In terms of housing need, the eDLP sets out a requirement for 625 dwellings in Hurworth. With completions in the village sitting at around 300 dwellings and allocations at around 190 there is a requirement for further growth in the village.

We understand that Hurworth has been designated as a Neighbourhood Plan Area and that this offers an opportunity for the village to bring forward its own allocations and development limits. Story Homes will engage with that process when it moves forward, but at present there has been limited progress. It is therefore our view that an allocation should be made in the eDLP to provide certainty that the indicative housing requirements for Hurworth will be met.

Policy H4: Housing Mix

Story Homes has concerns with the requirement in Policy H4 for 80% of new homes as category M4(2) and 9% as category M4(3).

The PPG[8] states that local planning authorities should take account of evidence that demonstrates a **clear need** for housing for people with specific housing needs. The PPG sets out evidence that may be required including:

- *"the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*

[8] Paragraph: 005 Reference ID: 56-005-20150327

- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*
- *the overall impact on viability."*[9]

The justification for the inclusion of the requirements for category M4(2) is the SHMA and specifically the expectation that the proportion of the population in older age groups is *"projected to increase during the Plan period, including among those aged 75 or over."*[10].

An increase in older population is not unique to Darlington. In a recently adopted Core Strategy Sunderland Council requires major development to provide 10% Category M4(2). Stockton-on-Tees 2019 Local Plan includes a requirement for 50% of new dwellings to meet category M(2).

Regarding the requirement for wheelchair user dwellings (M4(3)) the SHMA justifies this by reference to MHCLG data which shows that 3.3% of households have at least one wheelchair user, reiterating that this too should be expected to increase over the plan period[11]. There is therefore no statistical basis for the 80% and 9% figures identified in Policy H4.

In our client's view this is not *"evidence of a clear need"* as required by the PPG. This policy as worded is therefore unjustified and unsound.

Policy ENV 3

Draft Policy ENV 3 makes provision for a Green Wedge at 'Haughton/Red Hall'. At present, the extent of the north eastern part of the Green Wedge to the east of Burdon Farm is considered to be unnecessary and unduly restrictive on the potential development of the northern part of the adjacent Great Burdon strategic allocation (Site 20) to the east.

Whilst the Housing Allocation Statement for Site 20 in Appendix B of the Plan states that development should be concentrated on the southern part of the site sufficient housing must be provided in the north of the site to ensure the northern site access from the A1150 and the northern portion of the distributor link road is delivered. Bellway Homes and Story Homes have prepared a masterplan for the Burdon Hill site (Site 20) – see enclosed site specific representation – which should be read in conjunction with this letter. This has been prepared taking into account detailed site appraisal work including topographical, landscape and ecological surveys of the Site. This demonstrates that the Site can retain sufficient green open space to the east of Burdon Farm to provide the necessary landscape buffer. In our client's view it is neither justified nor effective to protect the full extent proposed within the Green Wedge east of Burdon Farm.

We also note that paragraph 9.3.4 of the Draft Local Plan states that the three Green Wedges in Policy ENV 3 are 'identified in the Darlington's [sic] Green Infrastructure Strategy'. However, there are no spatial indications of the extent of the features the Council wishes to preserve as Green Wedges in 'Darlington's Green Infrastructure Network' (page 12) which is replicated in the Local Plan as Figure 9.1. This diagram does not identify any features immediately to the south or east of Burdon Farm. Similarly, the 'Darlington Landscape Character Assessment' (2015) does not specify or justify any need to extend a Green Wedge to the south and east of Burdon Farm.

It is therefore requested that the extent of the Green Wedge is amended and the portion highlighted in blue in Figure 1 is undesignated from Policy ENV 3 and included in the proposed allocation at Great Burdon (site 20) under Policy H 2. This will provide flexibility for the delivery of the northern part of the Site and enable the Council to control the retention of the green space to the east of Burdon Farm through the planning application process. Indeed, development at Burdon Hill will not be able to

[9] Paragraph: 007 Reference ID: 56-007-20150327

[10] Darlington Strategic Housing Market Assessment 2015 – Report of Findings: Part 2, para 7.19

[11] As above, para 7.20

cover all the land to the east of Burdon Hill as there are there are gas mains running across part of the area and a need to respect the heritage areas to the north west which preclude unacceptable development.

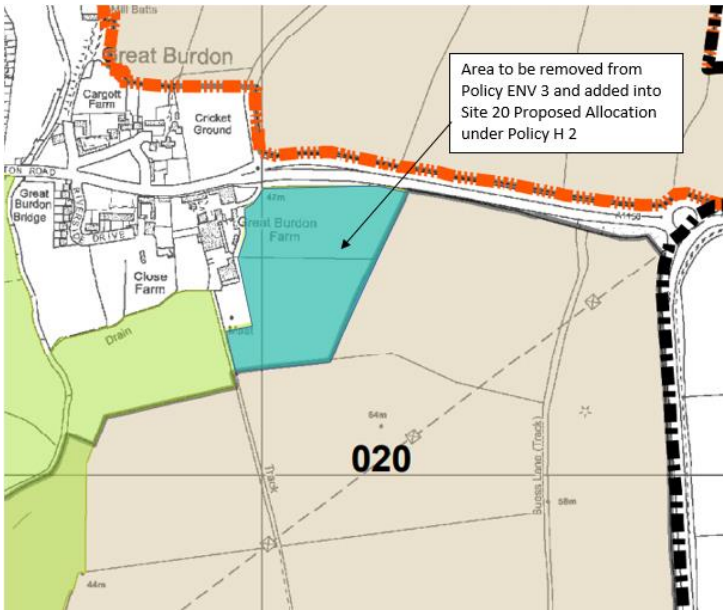

Figure 1. Suggested Amendment to Draft Proposals Map

Policy EN5 Green Infrastructure Standards

Policy EN5 requires the delivery of on-site green infrastructure in line with the 'Planning Obligations DPD' as part of new development. The policy makes no reference to the need to consider the existing supply of green infrastructure when calculating on-site green infrastructure provision. This is an important consideration as it is requirement of the NPPF which states that planning obligations should only be sought where they are necessary and relate to the scale and impact of the proposed development. The policy should therefore make it clear that any site should not be required to make good existing deficiencies but instead should only be required to mitigate its own needs or impact. Furthermore, if there is over provision elsewhere, new development should not be expected to provide additional green infrastructure as it would fail the tests of paragraph 56 of the NPPF.

In areas of open space deficiency, developments including 20 dwellings (or 0.2 hectares) or more, or non-residential developments of 1,000m gross floorspace or more, will be expected to deliver new green infrastructure in line with the standards contained in the adopted Planning Obligations SPD, or its replacement.

Policy IN2 Improving Access and Accessibility

Policy IN2 requires contributions to be sought from all developments, where considered appropriate, for the sustainable travel measures. This is not consistent with national planning policy. Contributions should only be sought in line with the requirements of paragraph 56 of the NPPF and CIL Regulations not *"where considered appropriate"* as the policy states.

Where consistent with paragraph 56 of the NPPF, planning obligation contributions will be sought from all developments, where considered appropriate, for the following sustainable travel measures:

Summary

We trust that these representations are in order but please do not hesitate to contact us should you require anything further.

Story Homes would welcome further engagement with the Council on the matters raised in these representations. We look forward to engaging in the examination in public next year.

Yours Faithfully

Tom Baker
Associated Director

ENCLOSED

Site specific representations for

- Land north of Neasham Rd, Hurworth – Appendix i
- Maxgate Farm – Appendix ii; and
- Great Burdon – Appendix iii