

Comment

Agent Mr Joe Ridgeon (1176271)

Email Address [REDACTED]

Address [REDACTED]

Consultee Thoroton and Croft Estate (1177696)

Email Address [REDACTED]

Address [REDACTED]

Event Name Darlington Local Plan 2016-2036 (Regulation 19)

Comment by Thoroton and Croft Estate (1177696)

Comment ID DBLPPS507

Response Date 17/09/20 15:00

Consultation Point 2 VISIONS, AIMS AND OBJECTIVES ([View](#))

Status Processed

Submission Type Email

Version 0.5

Files [Appendix A - Barmpton Farm.pdf](#)
[Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.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.

The Local Plan Vision is generally supported. In relation to the Specific Aims and Objectives we strongly support that to meet housing needs the plan needs “2.d. To have a portfolio of sites of different sizes, different housing products and delivery rates for the short, medium and long term.”

This will ensure that the plan is consistent with paragraph 61 of the NPPF2019, which requires local planning authorities to plan for a range of “size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”.

We also support the need for “A Well Connected Borough” with development located in sustainable locations with good access to services and facilities, helping to “Create Cohesive, Proud & Healthy Communities”.

Question 7

Please **upload any supporting documents** here. Please do not include any signatures or other personal data such as home addresses which you would not wish to see published on the Council's website.

[Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.pdf](#)

Comment

Agent	Mr Joe Ridgeon (1176271)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS508
Response Date	17/09/20 15:00
Consultation Point	Policy SD 1 Presumption in Favour of Sustainable Development (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.pdf Appendix A - Barmpton Farm.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)	<input checked="" type="checkbox"/> 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.

The wording of Policy SD1 does not accord with the wording set out in paragraph 11 of NPPF2019.

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.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.

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.

To be found sound the wording should be amended to be consistent with national policy or deleted as necessary.

Comment

Agent	Mr Joe Ridgeon (1176271)
Email Address	[REDACTED]
Address	[REDACTED]
Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS509
Response Date	17/09/20 15:00
Consultation Point	Policy SH 1 Settlement Hierarchy (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.pdf Appendix A - Barmpton Farm.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 3b

Your Comments

As you have supported this part of the plan do you wish to provide any additional comments?

Policy SH1 is strongly supported, especially the identification of the Darlington Urban Area as the priority area for development.

We also support paragraph 4.0.8, which states that “the urban fringe has been identified as the most sustainable, suitable, available and developable” location for new housing development.

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS510
Response Date	17/09/20 15:00
Consultation Point	Policy DC 1 Sustainable Design Principles and Climate Change (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.pdf Appendix A - Barmpton Farm.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)	
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.

Policy DC1 is considered to be out of date and the reference to the Darlington Design of New Development SPD should be amended to refer to the National Design Guide (October 2019), which sets out the characteristics of well-designed places and demonstrates what good design means in practice.

Furthermore, parts b. and c. repeat each other and the wording should be amended so that it is clearly written and unambiguous, in accordance with paragraph 16 of the NPPF2019.

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS511
Response Date	17/09/20 15:00
Consultation Point	Policy DC 2 Flood Risk & Water Management (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Appendix A - Barmpton Farm.pdf Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.pdf

Question 2

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

Effective

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.

Policy DC2 is generally supported, though it is considered that the wording of the policy is excessively long and repetitive of national guidance. Despite its length, the policy does not acknowledge that opportunities provided by new development to reduce the causes and impacts of flooding (as identified at paragraph 157c) of NPPF2019).

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.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.

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.

To be found effective, part g. should be amended to 'rainwater harvesting are utilised where appropriate'.

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS512
Response Date	17/09/20 15:00
Consultation Point	Policy DC 3 Health and Wellbeing (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.pdf Appendix A - Barmpton Farm.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.

Policy DC3 is generally supported. Part b. seeks to support the provision of new or improved health facilities in sustainable locations. There is an opportunity for the land at Heighcroft House, Heighington to accommodate health facilities.

Part g of Policy DC3 requires the submission of a Health Impact Assessment in line with Department of Health and Social Care, Health Impact Assessment Tools <https://www.gov.uk/government/publications/health-impact-assessment-tools>. This document is focused on policy and does not appear to be specifically aimed at residential development.

Part g. also refers to all other 'major' development. The NPPF2019 defines major development of 10 or more homes. To be found sound the wording of the policy should be amended

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS513
Response Date	17/09/20 15:00
Consultation Point	Policy DC 5 Skills and Training (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Appendix A - Barmpton Farm.pdf Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.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.

Policy DC5 states that the Borough Council "will seek to enter into a S106 Agreement to secure appropriate commitments and targets for employment skills and training". The proposed wording of the policy is imprecise and has not been accounted for in the viability assessment as it is not included in Table 8 – Other Policy Requirements (page 57-58 of Local Plan Viability Assessment – Working Draft, August 2020).

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS514
Response Date	17/09/20 15:00
Consultation Point	Policy H 1 Housing Requirement (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	Appendix A - Barmpton Farm.pdf Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.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)	<input type="checkbox"/> 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.

Policy H1 states that 'housing will be delivered to meet a minimum requirement of 422 net additional dwellings per annum over the plan period from 2016 to 2036'. However, it goes on to state the Council also has a 'Local Plan housing target of 492 net additional dwellings per annum over the plan period from 2016 to 2036' and that 'the above approach has been taken to provide a housing requirement range rather than a single figure' and that 'the housing target is not a restrictive maximum figure'.

We are supportive of Darlington's decision to utilise a figure over and above the minimum 'Standard Method' housing requirement. The proposed level will help support sustainable development, boost housing supply and support the economic prosperity of the area. However, as the policy refers to two figures it is unclear and ambiguous and contrary to paragraph 16 of the NPPF2019. We do not consider that a range is appropriate and are concerned that the top figure could be seen as maximum, even with text to state it is not, and could limit the development of homes. This is unsound as it is not in line with national policy, which looks to support the Government's objective of significantly boosting the supply of homes.

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 Joe Ridgeon (1176271)
Email Address	[REDACTED]
Address	[REDACTED]
Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS515
Response Date	17/09/20 15:00
Consultation Point	Policy H 10 Skertingham - Strategic Site Allocation (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Representations Statement.pdf Appendix A - Barmpton Farm.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.

Policy H10 is strongly supported. The proposed Allocation accords with the NPPF, which states:"72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate,

strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should: a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access; c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided; d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."

The Policy requires the submission of a "comprehensive masterplan" to ensure cohesive development is delivered at Skertingham. It is also recognised in the policy that a "network of green and blue infrastructure" is required to make the proposals acceptable.

To ensure that the Strategic Allocation is deliverable and can be found sound, it is imperative that all landowners, not just the site promoters and major landowners (paragraph 6.10.3) are fully involved in the process. No land equalisation agreement has yet been agreed and we recommend that the Council seek to ensure that this is place prior to submitting the draft Local Plan to the Secretary of State.

It is clear from the Landscape Sensitivity of Potential Housing Sites in Darlington Borough (Prepared by LUC for Darlington Borough Council July 2019) that the network of green and blue infrastructure proposed as part of the masterplan is integral to the development coming forward in a sustainable manner. The report states:

"Any development within site 251 should retain the green corridor along the River Skerne and the railway line, and the Skertingham Community Woodland. Public access and habitat enhancements should be part of proposals. The setting of Great Burdon, Barmpton, Skertingham Manor and Low Skertingham must be key considerations."

The green and blue infrastructure will therefore play a key role in the acceptability of the proposed development.

Furthermore, the policy states that: "To ensure that a cohesive development is delivered at Skertingham, the Council will only approve planning applications that adhere with the masterplan and deliver the necessary local and strategic infrastructure to support the development."

Given the timescales involved, it is considered that flexibility should be allowed for, to ensure the expected rate of housing delivery over the plan period can be assured. This will be beneficial especially where it would allow additional development outlets and to take advantage of any changes to the masterplan to accommodate opportunities arising from the potential Link Road Connection identified in the Skertingham Masterplan Framework.

Support from all of the landowners will be essential to ensure deliverability of the wider scheme, as this is key to ensuring the acceptability of the whole Strategic Allocation by mitigating the harm caused by the development, as well as being required as part of Policy H10, ENV4 and ENV5.

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS516
Response Date	17/09/20 15:00
Consultation Point	Policy ENV 4 Green and Blue Infrastructure (Strategic Policy) (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	Appendix A - Barmpton Farm.pdf Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.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 3b

Your Comments

As you have supported this part of the plan do you wish to provide any additional comments?

We support Policies ENV4 and ENV5, which are consistent with national policy and will have far reaching benefits to the environmental, social and economic needs of the community as set out in paragraph 9.4.3. To be deliverable all stakeholders, including landowners will need to be involved.

Comment

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Consultee	Thoroton and Croft Estate (1177696)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Thoroton and Croft Estate (1177696)
Comment ID	DBLPPS517
Response Date	17/09/20 15:00
Consultation Point	Policy ENV 5 Green Infrastructure Standards (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Appendix A - Barmpton Farm.pdf Reps to Local Plan Submission Reg 19 - Thoroton and Croft Estate.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 3b

Your Comments

As you have supported this part of the plan do you wish to provide any additional comments?

We support Policies ENV4 and ENV5, which are consistent with national policy and will have far reaching benefits to the environmental, social and economic needs of the community as set out in paragraph 9.4.3. To be deliverable all stakeholders, including landowners will need to be involved.

Darlington Borough Local Plan

Local Plan Submission (Regulation 19) representations

Land at Barmpton Grange Farm, Darlington

September 2020



Document Review Schedule

Client:	Thoroton and Croft Estate
Report Title:	Local Plan Submission (Regulation 19) representations
Version (Draft/Final):	FINAL

	Reviewee Name	Position	Date
Author:	Joe Ridgeon	Director	8/9/20
Reviewed:	Joe Ridgeon	Director	16/9/20
Updated			
Approved/Issued to Client:	Joe Ridgeon	Director	17/9/20
Issued to LPA:	Joe Ridgeon	Director	17/9/20

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Contents

- 1.0 Introduction
- 2.0 Response to Local Plan Submission (Regulation 19) consultation

1.0 Introduction

- 1.1 We have been instructed to make the following representations to the Local Plan Submission (Regulation 19) consultation. The additional evidence has been assessed against paragraph 35 of the National Planning Policy Framework (“NPPF2019”). Paragraph 35 states that for a plan to be found “sound” it should be:
- a) **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;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **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
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.2 The additional evidence and actions has also been considered against paragraph 31 of NPPF2019, which requires that the preparation of all policies should be “underpinned by relevant and up-to-date evidence”.
- 1.3 Our client, Thoroton and Croft Estate **supports** the Draft Local Plan and **strongly supports** Policy H10 – Skertingham Strategic Allocation. The proposed strategic allocation includes 17.88 hectares of land in the Estates ownership (Appendix 1). The Skertingham Masterplan Framework identifies the land as helping to deliver Strategic Green Infrastructure along the River Skern.
- 1.4 Each Section of the Draft Local Plan will be considered in turn and all paragraph numbers referred to relate to paragraphs of that document, unless otherwise stated.

2.0 Response to Local Plan Submission (Regulation 19) consultation

Chapter 2 Vision, Aims and Objectives

- 2.1 The Local Plan Vision is generally **supported**. In relation to the Specific Aims and Objectives we strongly support that to meet housing needs the plan needs “*2.d. To have a portfolio of sites of different sizes, different housing products and delivery rates for the short, medium and long term.*”
- 2.2 This will ensure that the plan is consistent with paragraph 61 of the NPPF2019, which requires local planning authorities to plan for a range of “*size, type and tenure of*

housing needed for different groups in the community should be assessed and reflected in planning policies”.

- 2.3 We also support the need for “A Well Connected Borough” with development located in sustainable locations with good access to services and facilities, helping to “Create Cohesive, Proud & Healthy Communities”.

Chapter 3 Presumption in Favour of Sustainable Development

- 2.4 The wording of **Policy SD1** does not accord with the wording set out in paragraph 11 of NPPF2019. To be found sound the wording should be amended to be consistent with national policy or deleted as necessary.

Chapter 4 The Settlement Hierarchy

- 2.5 **Policy SH1** is strongly **supported**, especially the identification of the Darlington Urban Area as the priority area for development.
- 2.6 We also support paragraph 4.0.8, which states that “*the urban fringe has been identified as the most sustainable, suitable, available and developable*” location for new housing development.

Chapter 5 Design, Climate Change and Construction

- 2.7 **Policy DC1** is considered to be out of date and the reference to the Darlington Design of New Development SPD should be amended to refer to the National Design Guide (October 2019), which sets out the characteristics of well-designed places and demonstrates what good design means in practice.
- 2.8 Furthermore, parts b. and c. repeat each other and the wording should be amended so that it is clearly written and unambiguous, in accordance with paragraph 16 of the NPPF2019.
- 2.9 **Policy DC2** is generally supported, though it is considered that the wording of the policy is excessively long and repetitive of national guidance. Despite its length, the policy does not acknowledge that opportunities provided by new development to reduce the causes and impacts of flooding (as identified at paragraph 157c) of NPPF2019).
- 2.10 To be found effective, part g. should be amended to ‘rainwater harvesting are utilised where appropriate’.
- 2.11 **Policy DC3** is generally supported. Part b. seeks to support the provision of new or improved health facilities in sustainable locations. There is an opportunity for the land at Heighcroft House, Heighington to accommodate health facilities.

- 2.12 Part g of Policy DC3 requires the submission of a Health Impact Assessment in line with Department of Health and Social Care, Health Impact Assessment Tools <https://www.gov.uk/government/publications/health-impact-assessment-tools>. This document is focused on policy and does not appear to be specifically aimed at residential development.
- 2.13 Part g. also refers to all other ‘major’ development. The NPPF2019 defines major development of 10 or more homes. To be found sound the wording of the policy should be amended.
- 2.14 **Policy DC5** states that the Borough Council “will seek to enter into a S106 Agreement to secure appropriate commitments and targets for employment skills and training”. The proposed wording of the policy is imprecise and has not been accounted for in the viability assessment as it is not included in Table 8 – Other Policy Requirements (page 57-58 of Local Plan Viability Assessment – Working Draft, August 2020).

Chapter 6 Housing

- 2.15 **Policy H1** states that ‘housing will be delivered to meet a minimum requirement of 422 net additional dwellings per annum over the plan period from 2016 to 2036’. However, it goes on to state the Council also has a ‘Local Plan housing target of 492 net additional dwellings per annum over the plan period from 2016 to 2036’ and that ‘the above approach has been taken to provide a housing requirement range rather than a single figure’ and that ‘the housing target is not a restrictive maximum figure’.
- 2.16 We are supportive of Darlington’s decision to utilise a figure over and above the minimum ‘Standard Method’ housing requirement. The proposed level will help support sustainable development, boost housing supply and support the economic prosperity of the area. However, as the policy refers to two figures it is unclear and ambiguous and contrary to paragraph 16 of the NPPF2019. We do not consider that a range is appropriate and are concerned that the top figure could be seen as maximum, even with text to state it is not, and could limit the development of homes. This is unsound as it is not in line with national policy, which looks to support the Government’s objective of significantly boosting the supply of homes.
- 2.17 **Policy H10** is strongly **supported**. The proposed Allocation accords with the NPPF, which states:

“72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development

where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
- c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."

2.18 The Policy requires the submission of a "comprehensive masterplan" to ensure cohesive development is delivered at Skerningham. It is also recognised in the policy that a "network of green and blue infrastructure" is required to make the proposals acceptable.

2.19 To ensure that the Strategic Allocation is deliverable and can be found sound, it is imperative that **all** landowners, not just the site promoters and major landowners (paragraph 6.10.3) are fully involved in the process. No land equalisation agreement has yet been agreed and we recommend that the Council seek to ensure that this is place prior to submitting the draft Local Plan to the Secretary of State.

2.20 It is clear from the *Landscape Sensitivity of Potential Housing Sites in Darlington Borough* (Prepared by LUC for Darlington Borough Council July 2019) that the network of green and blue infrastructure proposed as part of the masterplan is integral to the development coming forward in a sustainable manner. The report states:

"3.29 Any development within site 251 should retain the green corridor along the River Skerne and the railway line, and the Skerningham Community Woodland. Public access and habitat enhancements should be part of proposals. The setting of Great Burdon, Barmpton, Skerningham Manor and Low Skerningham must be key considerations."

2.21 The green and blue infrastructure will therefore play a key role in the acceptability of the proposed development.

2.22 Furthermore, the policy states that:

“To ensure that a cohesive development is delivered at Skerningham, the Council will only approve planning applications that adhere with the masterplan and deliver the necessary local and strategic infrastructure to support the development.”

2.23 Given the timescales involved, it is considered that flexibility should be allowed for, to ensure the expected rate of housing delivery over the plan period can be assured. This will be beneficial especially where it would allow additional development outlets and to take advantage of any changes to the masterplan to accommodate opportunities arising from the potential Link Road Connection identified in the Skerningham Masterplan Framework.

2.24 Support from all of the landowners will be essential to ensure deliverability of the wider scheme, as this is key to ensuring the acceptability of the whole Strategic Allocation by mitigating the harm caused by the development, as well as being required as part of Policy H10, ENV4 and ENV5.

Chapter 9 Environment

2.25 We **support Policies ENV4 and ENV5**, which are consistent with national policy and will have far reaching benefits to the environmental, social and economic needs of the community as set out in paragraph 9.4.3. To be deliverable **all** stakeholders, including landowners will need to be involved.

Land at Brampton Farm



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