

## Comment

<b>Agent</b>	Mr Martin Bonner (1300139)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod419
<b>Response Date</b>	26/11/21 16:34
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM 11
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

**Question 4**

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

HLL and HE welcome and support the modifications to DC1 which require development to "have regard to" the Darlington Design of New Development SPD and National Design Guidance to reflect the flexible approach to application of such documents as agreed during the hearings.

We would welcome the opportunity to comment on the content of the forthcoming Design of New Development SPD in due course.

**Question 5**

**Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.**

No modifications required.

## Comment

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<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMo420
<b>Response Date</b>	26/11/21 16:34
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM13
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

#### **Question 4**

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No modifications required.

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<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod421
<b>Response Date</b>	26/11/21 16:35
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM40
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

#### **Question 4**

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HLL & HE support the modifications to this text which permits the consideration of a range of relevant evidence in addition to the Strategic Housing Market Assessment (SHMA) for the purposes of determining a housing mix based on the most up to date information available.

The SHMA is indicative of a point in time and flexibility to review evidence will be required in delivering sites across the plan period.

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No modifications required.

## Comment

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<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod422
<b>Response Date</b>	26/11/21 16:36
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM41
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

**Question 4**

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

HLL & HE support the reduction in requirement from 80% to 45% which is reflective of our prior representations and representations made within the wider industry

**Question 5**

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No modifications required.



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<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod423
<b>Response Date</b>	26/11/21 16:36
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM44
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

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HLL & HE are broadly supportive of the amendments to Policy H5.

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Whilst the policy is considered sound via the inclusion of criterion c) of the policy which references "any other circumstances", as stated in our prior representations it would be beneficial to reference self-build developments of over 10 dwellings as an explicit exception to the requirement to provide of affordable housing on-site. Logistically the master developer would obtain an outline planning consent and provide infrastructure and serviced plots for self-builders to develop their homes individually via separate reserved matters applications. As such it would not deliver affordable housing on site in practice with bespoke homes being provided for owner occupiers.

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<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod424
<b>Response Date</b>	26/11/21 16:37
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM83-MM102
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

#### **Question 4**

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HLL & HE are supportive of the proposed modifications to policy H11 (Greater Faverdale) which are published as a result of a collaborative process between the promoters of the Site and Officers.

Whilst not referenced as a modification within the consultation document, HLL & HE welcome the amendment to the Monitoring Framework which specifies that the Masterplan will be received and agreed by Planning Committee as this provides clarity regarding the appropriate means of endorsing the Masterplan.

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We note a typing error at paragraph 6.11.11 of the supporting text with the wording used differing from the clear definitions provided within Policy H11. We have identified what we assume to be the missing text below in red and feel that this minor modification would assist in ensuring that the intent of the policy is clear: "Should development progress above the 750 dwellings or 24 hectares (net) of employment land in the local plan to 2036 it will be necessary to undertake a proportionate review of the infrastructure phasing plan to accompany any planning application for accelerated development. This could include evidence from a Transport Assessment for highways infrastructure but should also consider other additional infrastructure requirements where necessary. Significant additional infrastructure requirements for development not considered in this plan may necessitate the need for a plan or policy review".

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<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod425
<b>Response Date</b>	26/11/21 16:38
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM108
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

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The modifications regarding Greater Faverdale to reference E(g), B2 and B8 uses as acceptable for the employment element of the allocation are supported and ensure a sound plan with consistent references between H11 and E2.

**Question 5**

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No modifications required.

## Comment

<b>Agent</b>	Mr Martin Bonner (1300139)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMo426
<b>Response Date</b>	26/11/21 16:39
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM118
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

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HLL& HE support the exemption of retail and leisure development which is identified within Local Plan policies from impacts testing. The additional text at 8.2.6 is also supported which clarifies: "An impact assessment would not need to be undertaken for proposals to create the neighbourhood centres required by policies H10 and H11 at Skertingham and Greater Faverdale where proposals satisfy the requirements established in these policies" The exemption of the planned neighbourhood centres at Greater Faverdale is crucial for consistency and ensures a sound plan which does not prevent the delivery of allocated development.

#### **Question 5**

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No modifications required.



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<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMo427
<b>Response Date</b>	26/11/21 16:39
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM119
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

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HLL& HE support the exemption of retail and leisure development which is identified within Local Plan policies from impacts testing. The additional text at 8.2.6 is also supported which clarifies: "An impact assessment would not need to be undertaken for proposals to create the neighbourhood centres required by policies H10 and H11 at Skertingham and Greater Faverdale where proposals satisfy the requirements established in these policies" The exemption of the planned neighbourhood centres at Greater Faverdale is crucial for consistency and ensures a sound plan which does not prevent the delivery of allocated development.

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No modifications required.

## Comment

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<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
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<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod428
<b>Response Date</b>	26/11/21 16:44
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM126
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

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Yes

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With regard to the proposed modification of Part D of ENV1 in relation to non- designated heritage assets, HLL & HE are supportive of the proposed removal of the text identified within the consultation documents.

#### **Question 5**

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However, if the reasoning for the deletion is as per the Main Modifications Schedule which seeks to ensure consistency with national policy then we would request that further amendments are considered. For ease of reference national policy sets out a simple test in relation to non-designated heritage assets as follows:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Whilst ENV1 criterion D) has the same intent, it adds unnecessary additional wording such as referencing proposals which “harm or undermine the significance” of a non-designated heritage asset. This adds some uncertainty as to the definition of what “undermines” the significance and whether that is any different from “harming” the significance. In order to avoid any interpretation that this policy seeks to achieve something in addition to national policy this policy could be further enhanced through inconsequential revisions to remove any unintended ambiguity and simply reflect the test as set out in the NPPF i.e. “proposals which remove, or harm the significance of a non-designated heritage asset will only be permitted where the benefits are considered to outweigh the harm”.

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<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod429
<b>Response Date</b>	26/11/21 16:45
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM158
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

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Yes

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The minor text changes to the reference to Greater Faverale link road in IN1 simply add clarification of the route and are supported. Furthermore, the revised Figure 10.2 is supported as a sound addition which identifies the infrastructure required to deliver allocation H11 and clarifies the route of the “orbital route” as referenced in the supporting text.

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No modifications required.

## Comment

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<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
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<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod430
<b>Response Date</b>	26/11/21 16:46
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM159
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

#### **Question 4**

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

The minor text changes to the reference to Greater Faverale link road in IN1 simply add clarification of the route and are supported. Furthermore, the revised Figure 10.2 is supported as a sound addition which identifies the infrastructure required to deliver allocation H11 and clarifies the route of the “orbital route” as referenced in the supporting text.

#### **Question 5**

**Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.**

No modifications required.



## Comment

<b>Agent</b>	Mr Martin Bonner (1300139)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod431
<b>Response Date</b>	26/11/21 16:53
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM161
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

#### **Question 4**

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

HLL & HE are supportive of the amended text within criterion D of Policy IN2 as follows which provides clarity regarding the application of the policy when combined with supporting text as amended via modification M164.

The inclusion of policy text at the end of criterion d) to reference the potential need for financial contributions "where appropriate" is supported but it is only effective when combined with modification M164 of the supporting text which provides further explanation regarding the application of this policy and takes into account material considerations.d) All new major development should provide easy and safe access for those who wish to use be accessible by public transport. Accessibility is based on It is therefore expected that 80% or more of the dwellings on a site being within a 400 metres walking distance of a bus stop served by a regular daytime service (every 30 minutes). Where appropriate, financial contributions to provide a supported or extended bus service for up to 5 years, and bus stop infrastructure will be sought where sites are not currently served by regular services.

#### **Question 5**

**Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.**

No modifications required.

## Comment

<b>Agent</b>	Mr Martin Bonner (1300139)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod432
<b>Response Date</b>	26/11/21 16:55
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM164
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

#### **Question 4**

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

HLL & HE welcome this addition to the supportive text at 10.6.6 as a key point of clarification of the application of Policy IN2. Whilst they are supportive of the objectives of Policy IN2 criterion d) regarding accessible bus service provision it is important that there is a mechanism within the plan to enable other considerations beyond a fixed walking distance. Indeed, Policy IN2 will consider financial contributions “where appropriate” but this supporting text is necessary to clarify the application of the policy. It is considered that the proposed reference to “other material considerations” allows scope for each development proposal and their circumstances to be considered on their own merits and this is an important addition to ensure that Policy IN2 is effective and therefore sound. “Developments that are not within a reasonable walking distance of existing bus services will be expected to contribute to provide a supported bus service for 5 years. A reasonable walking distance is considered to be 400m, but other material considerations will be taken into account at the planning application stage including the distance to local services on foot, the frequency of existing bus services on routes further than 400m away and the likelihood, or otherwise, that a supported service will become commercially viable”.

#### **Question 5**

**Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.**

As highlighted above, reference within the proposed modification is imperative to ensuring flexibility in the application of policy IN2. For clarity we do not propose any amendments to this policy or modification MM164.

## Comment

<b>Agent</b>	Mr Martin Bonner (1300139)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Consultee</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Hellens Land Limited and Homes Engl (1300143)
<b>Comment ID</b>	DBLPMod433
<b>Response Date</b>	26/11/21 16:55
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Policies Map Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	PM1
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Support
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

Yes

**Question 4**

**Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.**

As per MM158 and MM159 in relation to the orbital route and the role of the Faverdale Link Road within it. HLL & HE are supportive of the modification to Map 1 which shows this route in red.

**Question 5**

**Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.**

No modifications required.