

**THEME 1: A CITY WITH A SUSTAINABLE FUTURE  
CATEGORISATION OF COMMENTS AND PLANNING ISSUE OR ACTION IDENTIFIED FOR CONSIDERATION**

**25th March 2018**

The comments have unique codes as follows:

- EQ = electronic questionnaire response
- Q = paper questionnaire response
- EM = email response
- WC = web comment

However, no personal details have been provided.

The letters making comments relevant to this theme are coded as follows:

- L2: The Coal Authority
- L4: Campaign to Protect Rural England
- L6: Durham Bird Club
- L8a: Durham City Cricket Club Response
- L9b: Durham County Council Appendices ABC
- L14: Environment Agency
- L15: Gladman Developments Limited
- L16: Historic England
- L18a: Lovegreen Developments
- L21: Natural England
- L23: Nevilles Cross Community Association
- L24: Northumbrian Water
- L25: Persimmon Homes Durham
- L26: Southlands Management

The codes for categorising the comments are as follows:

- c1: outside the remit of the neighbourhood plan
  - c1a: outside the Plan area
  - c1b: planning issue that has to be dealt with by the Council or by other bodies not by a neighbourhood plan
  - c1c: not a planning issue
- c2: a generic style comment of praise, blame, opinion etc not requiring a response just an acknowledgement
- c3: suggesting changes to the policies
- c4: suggesting changes to the projects

- c5: suggesting changes to the other text of the Plan

Comments have also been given traffic light shading where appropriate:

- **Support for a policy, project, the theme, or the Plan**
- **Comment that is already addressed in a policy, project or the theme**
- **Objection to a policy**

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	Categorisation	PLANNING ISSUE OR ACTION TO BE CONSIDERED
<b>COMMENTS ON THEME 1</b>		
EQ05. Consideration for pedestrians and cyclists consistently Copied to Theme 5	Copied to Theme 5	Copied to Theme 5
EQ08. Durham is a city of historic importance and its sustainability will rely on it remaining relevant as both a city of history but also as a pioneering sustainable city	<b>C2 Supportive comment</b>	Support noted
EQ13. Improved paving and lighting should not always be taken to mean more. Some road and path surfaces are best left as they are, apart from obvious repair. Parts of Durham have too much lighting. Illumination of the cathedral encourages planners to be provide excess lighting elsewhere. Tracks without vehicles such as Clay Lane Should avoid lighting.	C2 Concern about excessive lighting	Concern noted
EQ15. Sustainability must be put before profit by the Planners in Durham	<b>C2 Supportive comment</b>	Support noted
EQ18. Important that brownfield sites are utilised first New buildings not to dominate views of heritage sites Copied to Theme 2a	<b>C2 Supportive comment</b> Copied to Theme 2a	Support noted Copied to Theme 2a
Q04. Although I don't have a job as there are either no jobs on my chosen career or jobs a few miles out that either require further education or voluntary work In ... places ... of up to 6 to 8 weeks and I am 35 years old and am too old to do a level 3 qualification but require further work experience there are either jobs but no voluntary placements or jobs that ask you to do a further qualification or ...	C1c Not a planning issue	Not a planning issue
Q07. 4.19 Control of Taxi Ranks & Illegal parking on Claypath. Taxis with engines running affects air quality. Copied to Theme 5	Copied to Theme 5	Copied to Theme 5

Q09. We need more retail shops in the city eg John Lewis. Small business need to be encouraged to invest in shops (Less rent to pay) which would attract tourists in eg gift shops. Less coffee shops and charity shops. Copied to Theme 3	Copied to Theme 3	Copied to Theme 3
Q12. The University has grown too large for the size of the City. Further expansion should be resisted. Copied to Theme 4	Copied to Theme 4	Copied to Theme 4
Q13. We must always remember that it is a small city which would lose its charm if it was allowed to spread further out into green belt. The green area surrounding the city must be protected for the future. Copied to Theme 2b No more buildings like the dominating 'spider' building on the Stockton Road which completely dominates the area in a very unpleasant way. The Market Place was re-developed against the wishes of the majority of the population & might be made slightly more presentable by the removing of the chunks of concrete purporting to be seats & replacing them with more traditional seating Copied to Theme 2a	Copied to Theme 2b  Copied to Theme 2a	Copied to Theme 2b  Copied to Theme 2a
Q15. There should be greater emphasis on brownfield sites	C2 Supportive comment	Support noted
Q18. I endorse the protection of the Green Belt and biodiversity. I feel that the Green Belt can contribute to "public benefit" it is not simply a barrier to development but a resources as a public green space with access for leisure pursuits (G4) Copied to Theme 2b	C2 Supportive comment about green belt and biodiversity  Copied to Theme 2b	Support noted  Copied to Theme 2b
Q19. I agree with neighbourhood plan aims & comments. Vitally important to address what you have noted. This needs to occur quickly, very important to protect what we have left before there is further loss.	C2 Supportive comment	Support noted
Q22. Coherent & communicated recycling firm across the city = coordinate w/ Uni as theirs is bad too. COPIED FROM THEME 4	C2 Concern about recycling	Concern noted
Q28. I agree with it, but would feel it is very idealistic and general.	C2 Supportive comment	Support noted
Q32. As your summary says " isn't sustainability just mother hood & apple pie – no one could disagree:	C2 Supportive comment	Support noted
EQ26. Several out of character have already been built or approved which will not help if people appeal refusal Copied to Theme 2a	Copied to Theme 2a	Copied to Theme 2a
EQ27. Green belt sites need to be protected. Copied to Theme 2b	C2 Supportive comment about green belt Copied to Theme 2b	Support noted Copied to Theme 2b
EQ30. Agree absolutely with everything you say.	C2 Supportive comment	Support noted

EQ31. Slightly amending of the wording of the vision statements to provide consistency of wording with the overall vision would be helpful. For Theme 1: Durham City will have developments that meet current needs without limiting the ability of future generations to meet their needs. All new development will contribute to a long-term sustainable future for Durham City by ensuring a satisfactory balance among environmental, social and economic outcomes.	C5 Suggested text change to vision statement	Consider suggestion. Note that ALL vision statements need revising. We had agreed changes.
EQ34. I support both these sustainable proposals	C2 Supportive comment	Support noted
EQ35. Building need to be in keeping with layout of Durham	C2 Supportive comment	Support noted
EQ39. Quality development with a social conscience is important to me	C2 Supportive comment	Support noted
EQ42. All future developments in the city must meet clear and sensible environmental, social and economic benchmarks in order to protect and prioritise the well-being of it's residents and visitors, and to preserve the heritage of our built-environment and local ecology for future generations. I fully agree with all recommendations put forward in this section of the plan. I welcome the plan's proposals to protect the city's biodiversity and geodiversity alongside the promotion of 'green' energy development where feasible. COPIED FROM THEME 2b"	C2 Supportive comment about biodiversity, geodiversity and green energy	Support noted
EQ45. I approve of the sustainability thread running through the plan.	C2 Supportive comment	Support noted
EQ46. All new developments and renovations should be sustainable and climate change should be considered. All builds should be as energy efficient as possible. Conservation areas should be preserved! Copied to Theme 2a Would add to H5 that development proposals must also be climate-considerate and sustainable. COPIED FROM THEME 2a"	Supportive comment about climate change	Support noted
Q39. A worthy ambition Sustainability is a huge concern = massive work needed. COPIED FROM THEME 6"	C2 Supportive comment	Support noted
Q42. The Social Function: The needs of an increasing population of older people. There is not an adequate provision of suitable housing for this age group. The emphasis so far seems to be only student accommodation. Copied to Theme 4	Copied to Theme 4	Copied to Theme 4
Q48. Ease of access must also include disabled people i.e. wheelchair users, blind, deaf and also people pushing prams.	Copied to Theme 5	Copied to Theme 5

Provision for cyclists must not be at the detriment of pedestrians. Copied to Theme 5		
Q49. Need more car free areas Copied to Theme 5	Copied to Theme 5	Copied to Theme 5
Q53. Adherence to these principles will in the long run prove economical. Respect for the greenbelt and biodiversity is essential for the future. Copied to Theme 2b	C2 Supportive comment about green belt and biodiversity	Support noted
Q56. The right balance must be struck between private / commercial development and public interests, whilst protecting the environment etc.	C2 Supportive comment Copied to Theme 2b	Support noted Copied to Theme 2b
Q57. See attached comments [provided as scanned document in pdf format]. I will attach this to the email when I circulate the categorisation table.	It is difficult to respond to these comments. They cover a wide range of issues and generally say sensible things (apart from the preamble that states that the consultation document was not a plan). However, they do not correspond to what is said in Theme 1 generally and in S1 and S2 in particular. I would welcome advice about how to deal with these comments. Others will face the same issue as the comments cover all themes and policies.	Needs WG discussion
Q58. 4.19 Indicates that NPs have limited means for addressing Air Quality. Nitrogen Dioxide is a serious issue for parts of Durham City. This should be addressed specifically in the NP to encourage the County Council to be more active in addressing this.	C1b Concern about poor air quality, mostly outside remit (for Council)	Concern noted. DCC primarily responsible but we need to consider any measures we can include
Q60. I'm glad that sustainability is such a strong theme in the Neighbourhood Plan. Green Belt shouldn't be built on. Copied to Theme 2b	C2 Supportive comment  Copied to Theme 2b	Support noted  Copied to Theme 2b
Q61. I am in complete agreement with the entire plan. Copied to Further Comments	Copied to Further Comments	Copied to Further Comments
Q64. While I agree with the broad aims I am concerned that currently pedestrian crossings at lights etc. are not well designed for pedestrians in timing and siting. I consider the proposals for the new bus station to be flawed and unnecessary. Copied to Theme 5	Copied to Theme 5	Copied to Theme 5

Q66. The proposals for the conservation areas need to be enforced.	Copied to Theme 2a	Copied to Theme 2a
Q69. The effect of proposed developments on existing residents should be considered. Student accommodation should be developed substantially on college campus sites and proposed student developments diverted to other housing needs. Copied to Theme 4 As regards transport, vehicles transiting the city should be diverted to new by-passes, thus helping the air quality problem and easing current congestion. Copied to Theme 5 Green energy – we should avoid further wind turbines. The County already suffers grievously from a plethora of these grossly expensive and unjustifiable eyesores. COPIED FROM THEME 2b"	Copied to Theme 4  Copied to Theme 5  Cc1b Concern about wind turbines	Copied to Theme 4  Copied to Theme 5  Concern noted
Q74. Has to be done in context of realistic resources	C2 Concern about resources	Concern noted
Q75. Any future developments must include impact assessments with regards to its 'fit' within the city landscape and its provision of appropriate transport links ie walking, cycle routes, public transport. Copied to Theme 5 No further encroachment on Greenbelt, utilisation of brownfield sites and refurbishment of existing structures wherever possible. PART Copied to Theme 2b	Copied to Theme 5  C2 Supportive comments about green belt PART Copied to Theme 2b	Copied to Theme 5  Support noted PART Copied to Theme 2b
WC13 Comment on your post "Chapter 2: Introduction" Sustainability-the "golden thread" The way in which the principles of sustainability are interpreted and applied are, in my view, of paramount importance to planning decisions with the potential to damage Our Neighbourhood. Balance within the Plan My sense, at the moment, is that the draft Plan does not quite strike the right balance between seeking to conserve and protect all that is good about Our Neighbourhood and promoting and enabling beneficial development. This will be difficult to achieve when the role of Neighbourhood Planning Forum is constrained the way it is. Hopefully the opportunity may still exist to redress this imbalance by seeking to further strengthen the Implementation Section.	C5 Supportive comment but concern about balance between protection and development	Support noted but need to consider concern about balance and need to strengthen implementation section
WC58 Comment on your post "Theme 1: A City with a Sustainable Future"	C2 / c4 Supportive comment about low carbon energy	Support noted. Pursue reference to Durham

<p>I support all of the listed measures and would like to see more work on low carbon energy and the possibilities in Durham.          Would it be possible to draw up a map showing low carbon energy sites of interest?          These could include the Rivergreen Centre and the Archimedes Screw on the river Wear, and maybe sites outside the boundaries of the Neighbourhood Plan such as Sacriston Medical Centre and Harehope Quarry near Frosterley (which have won environmental awards). There must be other interesting micro/community initiatives out there worthy of attention and the Durham Energy Institute is a mine of information.          If energy prices rise and new forms of energy/better insulation &amp; energy efficiency become pressing needs then people will need inspiration and guidance. It would be great if Durham could build on its coal heritage to be a '21st century energy city' with cheap and sustainable energy for householders and businesses.</p>		<p>Energy Institute (Check with Evelyn Tehrani); perhaps an additional project?</p>
<p>WC71 Comment on your post "Summary: Theme 4: A City with Attractive and Affordable Places to Live" Copied to Theme 1          All new houses should be built to conserve as much energy as possible. This will make them cheaper to run and help the environment. We absolutely must try to return houses built for families to families. I agree with this policy.</p>	<p>C2 Supportive comment about energy conservation           Theme 4</p>	<p>Support noted</p>
<p>WC74 Comment on your post "Summary: Theme 1: A City with a Sustainable Future"          I agree with this policy.</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>
<p>WC82 Comment on your post "Theme 1: A City with a Sustainable Future"          I wholeheartedly agree with the policies. I strongly wish that the Planning Department scrutinises all proposed developments to ensure that they are not just for profit but also sustainable.</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>
<p>WC94 Comment on your post "Plan as pdf" Theme 1          In the section on sustainability and planning the guidelines are too vague - 'as many as possible' and as appropriate. Protecting green belt should be paramount, with sustainable energy use and climate change resilience next.          Dense use of land is not part of desirable attributes of a plan , but this is</p>	<p>C3 Suggested policy strengthening           Copied to Theme 4</p>	<p>Need to consider introductory wording of S1 and S2. Similar comment from DCC &amp; Q62 &amp; WC15.           Copied to Theme 4</p>

<p>one of the most important features to prevent use of green belt, reduce travelling distances, and thus make cycling and walking more desirable. There should need to be a proven demographic need for development, in the case of residential development, by comparison of number of residences with certain number of bedrooms and number of families in permanent residence together requiring that number of bedrooms. In general household size is shrinking so never mind squeals of developers, smaller properties are needed, not luxury developments.</p>		
<p>WC120 Comment on your post "Summary: Theme 1: A City with a Sustainable Future" I am very pleased to see sustainability placed at the centre of this Plan, and particularly welcome the fact that sustainability is given a meaningful definition, rather than being used as a general but empty term of approbation.</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>
<p>WC149 Comment on your post "Theme 1: A City with a Sustainable Future" WC15 and WC151 has made some very observant and worthwhile comments, I would agree.</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>
<p>WC151 Comment on your post "Theme 1: A City with a Sustainable Future" Upon reflection I am clear that by far the biggest single challenge facing the City in the Plan period will be how the University will be permitted to progress its further growth aspirations and how the further worsening of the already severe imbalance between "Town &amp; Gown" can be managed. Further University growth within the City on the scale recently announced will further substantially damage our City, create further pressures on infrastructure and support services, and challenge sustainability. Would I be naive in hoping that, once the Neighbourhood Plan is approved and in place, the planning system will enable unsustainable planning applications submitted piecemeal to be identified and rejected? At this late stage is there any way that the Neighbourhood Plan could include an additional provision which might give the City greater protection against University menace? Not an easy question, but worth thinking about. Copied to Theme 4</p>	<p>Concern about university expansion. Copied to Theme 4</p>	<p>Concern noted Copied to Theme 4</p>
<p>WC211 Comment on your post "Theme 1: A City with a Sustainable Future"</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>

<p>First, it was good to see the bringing together of the County Council's aims in the "Context" coupled with the discussion of where the Neighbourhood Plan could fit in this context.</p> <p>It struck me that part of this theme should be about using "brown field" sites for developments in the first place thus sustaining green space. I appreciate that this is also covered later.</p> <p>The comment about the University development is well made and its impact on the environment and local services. The impact on local service funding is important given the increased call on local government and health services none of which will receive increased funds as a consequence and in some cases income will be reduced.</p> <p>Copied to Theme 6</p>	<p>Concern about university expansion and impact on services.</p> <p>Copied to Theme 6</p>	<p>Copied to Theme 6</p>
<p>L4. CPRE supports the principles of this section and certainly promotes the redevelopment of suitable brownfield sites over Greenfield (or even green space within the Neighbourhood Plan area) sites.</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>
<p>L9b The county council has previously provided comments upon earlier iterations of the Durham City Neighbourhood Plan (DCNP) which have not yet been addressed. The Neighbourhood Plan Forum are again invited to reconsider the comments previously provided.</p> <p>Vision The county council supports the proposed Vision set out in (4.7).</p> <p>Objectives The objectives set out in 4.8 fail to fully reflect the actual stated scope of the policies proposed within this section of the plan given Policy S2 includes alterations to existing buildings.</p> <p>Furthermore it is unclear as to whether the intention of this section of the plan is to relate to all new proposals requiring planning permission which fall within the wide planning definition of 'development' or whether this has been intentionally omitted and a much narrower scope relating to new buildings and conversions/ renovations of existing buildings adopted.</p> <p>Context The county council considers that this section is an accurate and appropriate reflection of the existing context in this regard.</p> <p>Justification At 4.13 the county council considers that the text does not fully reflect the</p>	<p>Concern that previous comments have not been addressed.</p> <p>C2 Supportive comment about the vision</p> <p>c5 Concern about the mis-match between objectives and policies</p> <p>c5 Concern about the intention of the policies</p> <p>Support for Context section</p> <p>Concern about the text not fully</p>	<p>Some of them were addressed in the consultation draft and others are addressed in this document.</p> <p>Support noted</p> <p>Consider reviewing consistency of objectives and scope of policies</p> <p>Consider reviewing definitions and intention of the policies</p> <p>Support noted</p> <p>Consider reviewing text in light of</p>

<p>actual scope of the policies in this section of the plan as Policy S2 also relates to 'renovations and extensions' to existing buildings.</p> <p>Furthermore, as mentioned above it is unclear as to whether the intention of this section of the plan is to relate to all new proposals requiring planning permission which fall within the wide planning definition of 'development' or whether this has been intentionally omitted. This ambiguity is replicated in the titles and opening sentences of Policies S1 and S2. It is also very unclear as to whether it is intended that these policies may be used in conjunction with one another in some instances, particularly where a proposal relates to part new build and part conversion. It would be prudent to combine these policies or make it more explicit if they are intended to be used in conjunction with one another, particularly as some of the criteria potentially relates to all proposals.</p> <p>At 4.16 it is presumed, having read the remainder of the justification that reference is made to the county council's strategies to demonstrate that the policies within this section support and compliment these. It is suggested that the text is amended to clarify this so as to provide a clearer justification for these policies.</p> <p>Furthermore, in the interests of clarity the justification text (at 4.13 -4.23) would in parts benefit from a degree of rationalisation and rewording to ensure that a clear and focused justification for the policies is apparent to the reader.</p> <p>At 4.23 the relevant saved local plan policy has been referenced. The text would appear to relate to the content of saved Policy U9 and not U10 as stated. This point has previously been highlighted to the Forum.</p>	<p>reflecting the scope of the policies</p> <p>c5 Concern about the definitions and scope of the policies</p> <p>c3 Concern about the opening text of the policies. This concern is also voiced when commenting on S1 and S2.</p> <p>C3 Concern about whether these policies are to be used together</p> <p>c5 Concern that the text does not make it clear enough that the policies are intended to support and complement DCC's strategies</p> <p>c5 Concern that justification is not sufficiently clear</p> <p>c5 Concern that reference to saved policy is correct</p>	<p>final version of policies</p> <p>Consider reviewing definitions and intention of the policies</p> <p>Consider reviewing opening words of the policies with specific advice from DCC</p> <p>Consider reviewing text and make relationship between the policies clear</p> <p>Consider amending text to make this clear</p> <p>Consider reviewing text to make sure it is clear</p> <p>This point was not plucked up from DCC's earlier response and the reference will be checked and revised as necessary</p>
<p>L8a. The Club welcomes the thrust of the Plan and supports its themes and objectives. In particular the Club welcomes its recognition of the need to embrace sustainability and protect a truly beautiful and historic city.</p>	<p><b>C2 Supportive comment</b></p>	<p>Support noted</p>
<p>L14. We welcome the acknowledgement of flood risk within the neighbourhood plan area and the environment function set out in the vision and objectives of Theme 1.</p> <p>Although the consultation document makes reference to issues such as</p>	<p><b>C2 Supportive comment</b></p> <p>C3 / c5 Extensive suggestions about</p>	<p>Support noted</p> <p>Consider ways to strengthen</p>

<p>flooding, green infrastructure, green corridors and biodiversity, we would support greater references to water quality. In particular, we would welcome references to blue infrastructure and the importance of water for people and the environment. Blue infrastructure is a subset of green infrastructure and included rivers, ponds, streams, wetlands and their riparian margins. Rivers, lakes, coastal and ground waters are an important resource for people, the environment and supporting industry, wildlife, tourism and recreation. We would welcome the inclusion of objectives in relation to The Water Framework Directive (WFD). The WFD is a European Directive that requires all water bodies to achieve good status by 2021. It also aims to prevent deterioration in waterbody status; reduce water pollution; conserve aquatic ecosystems and habitats; reduce the effects of floods and droughts on waterbodies and promote sustainable use of water as a natural resource. We suggest that further detail could be included in the plan regarding the protection of waterbodies from pollution and management of waterbodies so that they reach and maintain a good and sustainable waterbody status. The Northumbria River Basin Management Plan sets out which actions and measures are needed to achieve the objectives of the WFD.</p>	<p>blue infrastructure, Water Quality, waterbodies and the Water Framework Directive.</p>	<p>policies and supporting text in light of this strong guidance from the Environment Agency.</p>
<p><b>Policy S1</b></p>		
<p>Q11. 2. and 3. under Policy S1 are most important to retain the character of Durham.</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>
<p>EQ25. Two very thorough and comprehensive policies.</p> <p>S1.7. is particularly important to resist some of the unsustainable aspects of the university expansion, like the demolition of Dunelm House. Copied to Theme 2a</p> <p>One point I think that might not have been considered is food sustainability and food waste, and working together as a community to ensure we reduce this. Maybe a mention of support for local projects that are trying to tackle this issue would be helpful? Copied to Further Comments</p>	<p>C2 Supportive comment</p> <p>Concern about demolition of Dunelm House. Copied to Theme 2a</p> <p>Concern about food sustainability and food waste Copied to Further Comments</p>	<p>Support noted</p> <p>Copied to Theme 2a</p> <p>This is covered in Project 22. Copied to Further Comments</p>
<p>Q29. S1: I agree with the statement but have no confidence that it will be applied, based on previous promises and resulting developments. Local residents needs have not been considered or protected.</p>	<p>C2 Supportive comment</p>	<p>Support and concern noted</p>
<p>EQ52. I agree with all of S1. A mix of uses is important so that student</p>	<p>C2 Supportive comment</p>	<p>Support noted</p>

<p>accommodation does not predominate areas and local communities can flourish. Wildlife and green spaces are important and must be preserved. Preservation and enhancement of conservation areas and heritage assets is particularly important. There should be a presumption for preservation and re-use of buildings. New buildings and alterations to existing ones should be sympathetic and in-keeping with the historic area and buildings should be restored rather than being allowed to become dilapidated so they can be knocked down and replaced with something new. Permission for anything other than restoration should be refused where a heritage asset has been allowed to deteriorate over a period of time. Large student halls of residence and other complexes should be built out of traditional materials rather than cladding and should not be prominent in the skyline. Character and local distinctiveness, tranquillity and contribution to the sense of place are appropriate factors to consider for development. Planning should seek to reverse concrete developments and 60s / 70s for buildings more in keeping with the character of the city. Traditional shop frontings should be encouraged. Public art and public facilities including seating and toilet facilities (including for disabled) are important. Public transport and good access for pedestrians, runners, cyclists and public transport are important. Taxis should be limited as huge rows of them add little to the city and add to congestion. Parts Copied to Themes 2a, 2b, 4, 5, 6 Vacant shops and buildings should be re-used.</p>	<p>Parts Copied to Themes 2a, 2b, 4, 5, 6</p>	<p>Parts Copied to Themes 2a, 2b, 4, 5, 6</p>
<p>Q47. S1: paving is hazardous in many areas Copied to Theme 5</p>	<p>Copied to Theme 5</p>	<p>Copied to Theme 5</p>
<p>Q62. The headline wording of S1 and S2 is too vague: "as many as appropriate of the following" will lead to approval. What if none of the clauses is met / achieved? How many is appropriate? Who determines what is appropriate?</p>	<p>C3 Suggested policy strengthening</p>	<p>Need to consider introductory wording of S1 and S2. Similar comment from DCC &amp; WC94 WC15.</p>
<p>Q68. S1 Should also include disabled access. We have an ageing population. We need to take this into account</p>	<p>C3 Concern about access</p>	<p>Covered in S1.10 but could be strengthened / highlighted.</p>
<p>WC15 Comment on your post "Theme 1: A City with a Sustainable Future" POLICY S 1. I support all the listed measures, but I would suggest that the second line of the opening sentence should say "...would promote as many as possible of the following measures." That might better</p>	<p>C3 Suggested policy strengthening</p>	<p>Need to consider introductory wording of S1 and S2. Similar comment from DCC &amp; WC94 &amp; Q62</p>

encourage planning applications which help to promote sustainable development.		
WC112 Comment on your post "Policy S1" The SRA fully endorsed this policy and placed particular emphasis on protecting the Green Belt and promoting resilience to climate change.	C2 Supportive comments about green belt and climate change	Support noted
WC185 Comment on your post "Policy S1" Copied to Theme 5 In its policy setting out requirements for all development and re-development sites in the City, the Plan draws attention to the need for a coordinated approach to paving, lighting and signage. We endorse this part of the policy, and also the part which draws attention to the need for ease of access by public transport, walking and cycling, to all development and re-development sites, provided that means ease of access for all residents and visitors, including those with disabilities.	C3 Supportive comment plus concern about access  Copied to Theme 5	Support noted Access covered in S1.10 but could be strengthened / highlighted.  Copied to Theme 5
WC212 Comment on your post "Policy S1" Fully endorse the set of criteria in this section	C2 Supportive comment	Support noted
L2. The Coal Authority would wish to see consideration given to the risks posed to the proposed developments by past coal mining activity in accordance with National Planning Policy prior to any formal allocation.	C3 Suggested policy addition to require checks with the Coal Authority before allocation of sites	Consider policy addition, though probably already covered by national policy
L6. In point 3 you mention the protection of biodiversity. Can I suggest that this should also include the enhancement of biodiversity – I suggest this is consistent with paragraph 109 of the NPPF.	C3 Suggested policy addition to enhance biodiversity	Consider policy addition
L9b Whilst the county council supports the inclusion of a policy which sets out parameters for judging the sustainability credentials of a proposal, as specified in a recent Health Check it maintains that in the interests of clarity and effective future application of the policy the opening sentence should be reworded. For example: 'Support shall be given to the development and redevelopment of sites which fulfil all of the following criteria that are applicable to it' As it reads at present it is not clear whether the policy would support a proposal if only one of the criteria is met. Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 7: It is considered that this criterion should simply refer to	C3 Concern about the opening words of the policy.  C3 Concern about the clarity of this	Similar concerns have been expressed by other respondents, though some want it to require all criteria to be met. Consider revising wording with advice from DCC  Consider revising wording with advice from DCC

<p>designated and non -designated heritage assets or provide an exhaustive list of those assets should be included. At present the list provided is incomplete and reference to heritage asserts is repeated in the same sentence.</p> <p>Criterion 8: It remains concerning that specific reference is not made to biodiversity. Although it could be argued that biodiversity is included within the term 'green assets' this is not explicit and a definition is not provided within the plan. The county council considers that the use of the term 'natural environment' or provision of a clear definition is required.</p> <p>Criterion 11: In order that it is clear that this criterion relates to ensuring a development's has a good relationship to existing transportation opportunities is considered that this should be amended to read; 'ease of access to public transport, walking and cycling opportunities'</p> <p>Since the Health Check criterion 2 has been amended. This criterion now effectively introduces a sequential test. There is already well established national and local Green belt policy available for determining the acceptability of development in the Green Belt. Therefore it is considered that 'to protect the Green Belt' should be deleted.</p>	<p>criterion</p> <p>c3 Concern about lack of clarity about biodiversity</p> <p>c3 Concern about the clarity of this criterion</p> <p>c3 Concern about the wording of this criterion. At the moment it reads:" redevelopment of a brownfield site to protect the Green Belt, as long as its biodiversity is protected."</p>	<p>"Green assets" are defined in para 4.62. However, this wording can be reviewed with advice from DCC</p> <p>Consider accepting suggested re-wording</p> <p>Unsure about the reference to a sequential test. Suggest that the reference to protecting the Green Belt should be moved to the justification text</p>
<p>L14. Further to this we support Policy S1 to promote resilience to climate change including avoidance of sites in the flood plain. However for clarity I would advise that point 5 of policy S1 could be re-worded to the following: <i>resilience to climate change including avoidance of sites in flood zones 2 and 3.</i></p>	<p>C3 Suggested policy wording to avoid sites in flood zones 2 and 3.</p>	<p>Consider adopting suggested wording</p>
<p>L15. Whilst we support the general approach to the policy in principle, Gladman is concerned that the emphasis of the policy is to 'protect' the greenbelt through the redevelopment of brownfield land. Whilst noting the importance of Green Belt, it is important to note that the Plan does not set out an approach which seeks to 'protect' the existing Green Belt when the redrawing of Green Belt boundaries may be necessary through the subsequent Local Plan review and it is important the DNP does not undermine the potential future need for development and release of land from the Green Belt and could result in the NDP becoming out of date should this occur. In this regard, this element of the policy should be modified to 'Redevelopment of a brownfield site within the neighbourhood area will be supported'.</p>	<p>C3 Suggested policy amendment to reduce protection of GB. See L26</p>	<p>Consider suggestion</p>

<p>Gladman is further concerned with the policy's emphasis towards the 'protection of biodiversity/geodiversity, designated wildlife sites and protected species'. It is a concern that the emphasis of the policy is very much on 'protection' of these assets as opposed to the approach required by paragraph 113 of the Framework which refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives appropriate weight to their importance and contribution to wider networks.</p>	<p>C3 Suggested policy amendment to reduce protection of biodiversity etc.</p>	<p>Consider suggestion</p>
<p>L16. I am concerned that the main sentence of both policies [S1 and S2] only requires proposals to 'promote' the criteria set out. This is a less onerous requirement than 'satisfy' or 'fulfil', which I recommend using instead.</p> <p>The revised wording of Policy S1 point 7 still does not reflect our recommendation at the last stage. Following our previous comments, the word 'significance' is still missing (a very important concept which underpins the NPPF's approach to historic environment management) and the wording in brackets in the policy ambiguously includes some types of heritage assets but excludes others. It would be better to read, for example: "Protection and enhancement of the significance of designated and non-designated heritage assets, including significance derived from their setting, as well as of character, local distinctiveness, views, tranquillity and the contribution made to sense of place". You could name the different types of heritage asset (see the NPPF's definitions) in the supporting text.</p>	<p>C3 Suggested policy re-wording to strengthen requirements</p> <p>C3 Suggested policy re-wording to clarify policy. Previous comments dated 16 Jan 2017</p>	<p>Consider suggestion, noting that DCC is also concerned about this wording, as are several other respondents</p> <p>Consider suggestion after checking previous comments</p>
<p>L18a. Development Briefs were in the past very useful to developers and the general public alike, not to mention the LPA. Would it not be in the interests of the City to restore them?</p>	<p>C3 Suggests restoration of Development Briefs</p>	<p>Consider suggestion. Also relevant to Theme 4</p>
<p>L21. Natural England welcomes the inclusion of biodiversity in Policy S1, however, instead of only referring to the protection of biodiversity, we advise adding the enhancement as well, in line with NPPF policies 9 and 109.</p>	<p>C3 Suggested policy re-wording to strengthen requirements</p>	<p>Consider suggestion</p>
<p>L23. We agree with Policies S1 and S2 as general statements of intent but our agreement is only partial in that we consider that the Plan should be more direct about what type of City the Plan wants. From the Plan the inference is for a City whose primary focus is as a tourist destination and</p>	<p>C2 Support for S1 and S2 in general, but critical that overall vision not strong enough</p>	<p>Support noted</p>

<p>residents' city, which we support. We believe that both an unrealistic ambition for an entrepreneurial hub which is not supported by empirical evidence and a rapidly-emerging likelihood of a campus city by default. In relation to the latter, the failure to establish an overall strategic focus for the City has also led, either explicitly or implicitly, to the vacuum being filled by the University whose unrelenting ambitions is likely to lead to demands for changes that could affect the City's infrastructure, facilities and services at the expense of residents and tourism.</p>		
<p>L24. Furthermore, we welcome Policy S1 - Sustainable Development Requirements of All Development and Re-development Sites. We particularly support Point 4 of this policy, whereby the Neighbourhood Plan promotes the prudent and efficient use of natural resources, particularly in the context of water efficiency and conservation. In addition, we welcome point 5 of Policy S1, which refers to resilience to climate change. We are pleased to note the inclusion of a point that recognises climate change is a crucial element that requires consideration. The justification highlights "proactive strategies are needed to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations". Identifying and mitigating flood risk will help ensure new developments are sustainable, particularly in light of predicted changes in weather patterns as a result of climate change.</p>	<p><b>C2 Support</b> for S1, particularly S1.4 promoting water conservation and S1.5 promoting resilience to climate change.</p>	<p>Support noted</p>
<p>L 26. Policy S1: Sustainable Development Requirements of All Development and Re-development Sites I partially agree                  Policy S2: Sustainable Development Requirements Of All New Building Including Renovations and Extensions I partially agree                  Any comments on Theme 1: We broadly support the intentions of draft Policies S1 and S2 although we suggest the following minor amendments to ensure the policies are consistent with national policy. Policy S1 sub point 2 includes the following measure: "redevelopment of a brownfield site to protect the Green Belt, as long as its biodiversity is protected". We suggest revising this to: "encouraging the redevelopment of brownfield sites as long as its biodiversity is protected". The reference to protecting the Green Belt is not required as national policy outlines that inappropriate development will only be permitted in the Green Belt in very special circumstances or in exceptional circumstances if proposed for</p>	<p><b>C2 General support</b> for Theme 1 and policies S1 and S2.</p> <p><b>C3 Suggested re-wording of S1.2 to remove reference to protecting GB. See L15</b></p>	<p>Support noted</p> <p>Consider suggested wording</p>

development through the emerging Local Plan.		
<b>Policy S2</b>		
EQ43. Re: Policy S2.9 - Appropriate adaptation for re-use of existing buildings in the city centre is something we wholeheartedly back as an organisation. We would like to see evidence that property owners have explored the potential for adaptive re-use of primary and secondary frontage premises before permission is granted for demolition or major alteration, unless the usage is deemed to be a priority i.e. appropriate to town centre use as defined in the Economic policy proposals. Copied to Theme 3	C2 Supportive comment Copied to Theme 3	Support noted Copied to Theme 3
Q29. S1: I agree with the statement but have no confidence that it will be applied, based on previous promises and resulting developments. Local residents needs have not been considered or protected. S2: See previous comment – work so far carried out does not demonstrate these themes."	C5 Supportive comment but concern about ineffective implementation.	Support noted but need to consider concern about implementation
EQ40. S2 describes very high standards, they will not always be achievable, but the emphasis must be on developers to provide compelling reasons for the hopefully, minority of cases when these high standards are not met.	C2 Supportive comment	Support noted
EQ52. I agree with all of S2. Keeping harmony in an area is particularly important. Appropriate adaptation and re-use vacant buildings is important, particularly where they are of historic interest. Ensuring privacy to neighbours is important.	C2 Supportive comment	Support noted
Q62. The headline wording of S1 and S2 is too vague: "as many as appropriate of the following" will lead to approval. What id none of the clauses is met / achieved? How many is appropriate? Who determines what is appropriate?	C3 Suggested policy strengthening	Need to consider introductory wording of S1 and S2. Similar comment from DCC & WC94 & WC15.
Q68. S2 Buildings should not be built to minimum building standards but to best practice. Plans for new builds and refurbishing must be assessed by a qualified access consultant not an architect who thinks he knows.	C3 Supportive comment but concern about access	Support noted Access covered in S1.10 but could be strengthened / highlighted.
Q76. S2-1: Attempt firstly if possible to always try to reuse historic buildings or partially reuse them, to adapt them and include appropriate	C2 Supportive comment	Support noted

renovations and extensions. Reuse their materials and architectural features. Copied to Theme 3 This should be included also on p.4.16 regarding resilience to climate change.	Copied to Theme 3 C3 Suggested text change	Copied to Theme 3 Consider text change in 4.16. Not clear what it would be!
WC15 Comment on your post "Theme 1: A City with a Sustainable Future" POLICY S 2. I support all the listed measures and, as for Policy S 1,would wish approved developments to promote as many of them as possible.	C2 Supportive comment	Support noted
WC106 Comment on your post "Policy S2" The SRA fully supported this policy.	C2 Supportive comment	Support noted
WC213 Comment on your post "Policy S2" Fully support the criteria in this section with particular emphasis on the architectural styles and local impact. The development of the PBSAs in many places is a good example where this, in my opinion has failed to date as we see the solid walls of the developments at Nevilles Cross and County Hospital. Heavy visual impact. Plans as considered currently often don't set the buildings in their local context. There are other examples in progress.	C2 Supportive comment	Support noted
L6. Point 6 (SUDS) is fully supported as these can also benefit wildlife particularly some water birds.	C3 Supportive comment about SUDS with additional benefits to birds	Consider additional wording
L9b Whilst the county council supports the inclusion of a policy which sets out parameters for judging the sustainability credentials of a proposal, as specified in a recent Health Check it maintains that in the interests of clarity and effective future application of the policy the opening sentence should be reworded to read. For example: 'Support shall be given to the alteration or extension of existing buildings which fulfil all of the following criteria that are applicable to it' As mentioned earlier it is unclear at present as to what type of development this policy relates to given the reference to 'new building development' which would appear to replicate the purpose of Policy S1. Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion1: This criterion does not accord with paragraph 63 of NPPF. The implication is a resistance to modern architecture and stifling of innovative	C3 Concern about the opening words of the policy.  C3 Concern about the relationship to S1  c3 Concern that the criterion does not accord with NPPF	Similar concerns have been expressed by other respondents, though some want it to require all criteria to be met. Consider revising wording with advice from DCC  Note: S1 refers to sites and S2 refers to buildings  Reconsider wording, but there is no intention to resist "outstanding or innovative designs which help to

<p>design.</p> <p>Criterion 4: The wording introduces an intangible measure which could result in inconsistent decisions.</p> <p>Criterion 5: Clarification as to what constitutes ‘water environment’ should be provided.</p> <p>Criterion 9: As there is ambiguity regarding the scope of developments relating to Policies S1 and S2 it is unclear as to whether should in fact be located in Policy S1. Furthermore, the unstated implication of this criterion is that proposals relating to under used or occupied building are not supported which may be an unintended consequence.</p>	<p>c3 Concern about the implications of this criterion which reads: “utilisation of the highest appropriate building standards to ensure minimal energy consumption and maximum energy generation and use from renewable resources, including the use of energy efficient solar design principles”</p> <p>c3 Need to clarify “water environment”</p> <p>c3 Suggestion that this should be in S1 and that there might be an unintended consequence</p>	<p>raise the standard of design more generally in the area” (NPPF, 63)</p> <p>Unclear about the nature of this comment. Reconsider wording with advice from DCC</p> <p>This needs to be considered in the light of comments from the Environment Agency in L14 which wants more emphasis on “blue infrastructure”. Adopting their suggestions should address this point.</p> <p>The criterion relates to buildings rather than sites and so should be in S2. The intention is to encourage the re-use of vacant buildings and it is intended precisely to support proposals relating to under-used or unoccupied buildings</p>
<p>L14. We encourage sustainable flood prevention measures within new development such as SuDs and we recommend that these are designed in a way that provides additional habitat.</p>	<p><b>C3 Support for SUDS</b> with addition about habitat enhancement. (See L6 and L24)</p>	<p>Consider additional wording</p>
<p>L15. Although recognising the importance of design principles, it is important that this policy does not place unsubstantiated requirements to conform to certain development forms and style and that the policies contained in the plan avoid unnecessary prescription or detail that does not render development proposals unviable.</p>	<p>C2 Comment that policies should not be unnecessarily prescriptive about design</p>	<p>Comment noted</p>

<p>L16. In Policy S2, I am surprised you have deleted point 2 from the previous draft because the issue of views, setting and skyline is so important in your plan area. My revised wording for point 7 in Policy S1 might provide similar protection (you will note I included the word 'views' in that).</p>	<p>C3 Suggested policy re-wording to clarify policy. Previous comments dated 16 Jan 2017</p>	<p>Consider suggestion after checking previous comments</p>
<p>L24 We also support Policy S2 - Sustainable Development Requirements of All New Building Developments Including Renovations and Extensions. We particularly support point 5 that wishes to prevent any negative effects, either directly or indirectly, on the quality of the water environment, and where possible lead to an improvement of the water environment. Furthermore we are pleased to welcome point 6 which aims to utilise a sustainable drainage approach through promoting the use of Sustainable Urban Drainage System (SUDS). Such systems can provide multiple benefits in addition to their primary role in flood risk management. Additional benefits include the potential for improvements to water quality, amenity and biodiversity in the local area. We welcome that the Neighbourhood Plan encourages the use of SuDS on new developments and consider that this will promote sustainable water management in the neighbourhood plan area.</p>	<p>C2 Support for S2, particularly S2.5 improving the water environment  C3 Support for S2.6 promoting SUDS and its environmental benefits (See L6 and L14)</p>	<p>Support noted  Support noted Consider additional wording</p>
<p>L 25. Persimmon Homes object to Policy S2 point 4. The latest update to Building Regulations introduced a requirement for new dwellings to achieve or better a fabric energy efficiency target in addition to carbon dioxide targets. In essence the issue of energy efficiency, energy generation and move toward zero carbon are no longer planning matters nor are Building Standards generally both of which are matters of Building Regulations, and as such point 4 of Policy S2 is unnecessary. It is unclear if the purpose of the policy is to ensure new developments achieve appropriate Building Regulations as it refers to simply building standards. Due to the above points Persimmon Homes suggest that either Policy S2 point 4 is removed or amended to read: "Constructed to the appropriate Building Regulations Standard."</p>	<p>C3 Suggested re-wording of S2.4 about Building Regulations.</p>	<p>Consider suggested wording</p>
<p>L 26. Policy S1: Sustainable Development Requirements of All Development and Re-development Sites I partially agree Policy S2: Sustainable Development Requirements Of All New Building Including Renovations and Extensions I partially agree</p>	<p>C2 General support for Theme 1 and policies S1 and S2.</p>	<p>Support noted</p>

Any comments on Theme 1: We broadly support the intentions of draft Policies S1 and S2		
<b>Policy S3 - new</b>		
Q43. I think the quality of new development in the City is barely adequate for an ordinary place, let alone a Cathedral City with a World Heritage site, A Policy S3 is needed that requires any sites above a minimum size to have a design brief or for larger sites a master plan	C3 Suggested policy addition	Consider policy addition; could perhaps be incorporated in S1