

**2019 PRE-SUBMISSION CONSULTATION
CATEGORISATION OF COMMENTS AND PLANNING ISSUE OR ACTION IDENTIFIED**

**Theme1 - A City with a Sustainable Future
17 August 2019**

The comments have unique codes as follows:

- SEQ = electronic questionnaire response
- SQ = paper questionnaire response
- SEM = email response
- SWC = web comment

However, no personal details have been provided.

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

- L1 = Coal Authority
- L2 = City of Durham Trust
- L4 = Durham City Access For All
- L5 = Durham County Council
 - L5b = Durham County Council Appendix
- L6 = Durham University
 - L6a = Durham University Response
- L7 = Environment Agency
- L8 = Historic England
 - L8a = Historic England, Letter on Plan
- L9 = Kier Property Ltd
- L17 = Southlands Management Ltd
- L18 = WHS Coordinator

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 input into initiatives in 'Looking Forwards'
- c5: suggesting changes to the other text of the Plan

THEME 1

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	CATEGORISATION	PLANNING ISSUE OR ACTION IDENTIFIED
COMMENTS RELEVANT TO THEME 1		
<p>SQ10 {Parts copied to Theme 1, 2b,3,4,Comments} I do wonder if this - or indeed the eventual County Plan - really takes into account the climate emergency. Personally, I'd be happy to see PV panels on roofs and turbines where they can be accommodated. {Resident DH1}</p>	C2 Whether the plan takes account of the climate emergency	The CDP deals with wind turbines in Policy 35. NP Policy S1 h) promotes on-site renewable energy generation wherever possible. Not all locations are suitable for solar panels and there are restrictions in Conservation Areas.
<p>L1 Coal Authority The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing. As you will be aware the Neighbourhood Plan area lies within the current defined coalfield. According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity including; mine entries, recorded and likely unrecorded shallow coal workings and reported surface hazards. Allocations for new development should consider the potential risks posed by past coal mining activity to potential development sites. This is specifically prudent when mine entries are present on a site and these may impact on the quantum of development which can be accommodated. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our</p>	C1b Concern about developments in the coalfield area.	The Coal Authority is a statutory consultee for all planning applications in Our Neighbourhood.

<p>adopted policy: https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries In addition any allocations on the surface coal resource will need to consider the impacts of mineral sterilisation in accordance with National Planning Policy.</p>		
<p>SQ14 {Parts copied to Themes 1,3,4} S1: insist on solar panels on new builds. {Resident DH1}</p>	C3 Solar panels should be compulsory	NP Policy S1 h) promotes on-site renewable energy generation wherever possible. Not all locations are suitable for solar panels and there are restrictions in Conservation Areas.
<p>L7 Environment Agency Flood Risk <u>Flood Zone 1:</u> We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1. Based on the environmental constraints within the area, we therefore have no further detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p>	C2 Support for NP S1 with regard to flood zones	Support for NP S1 with regard to flood zones noted. Coming from the Environment Agency, this endorsement of Policy S1 is important in view of other criticisms of the plan's treatment of flood zones.
<p>L18 WHS Coordinator {parts copied to Themes 1,2a,2b,3,4,5, Comments}</p>	C2 Support for policies S1 and S2 for their role in requiring developments to respond fully to the special historic	Support for NP S1 and S2 noted from a key stakeholder in the importance of Our Neighbourhood's unique heritage.

<p>Theme 1: A City with a Sustainable Future Policy S1: Sustainable Development requirements of all Development and Re-development Sites Including all New Building, Renovations, and Extensions Conservation, preservation and enhancement of Our Neighbourhood by: <i>c) Harmonising with its context in terms of scale, layout, density, massing, height, materials, colour, and hard and soft landscaping;</i> <i>d) Conserving and enhancing the setting, character, local distinctiveness, important views, tranquillity and the contribution made to the sense of place by Our Neighbourhood's designated and non-designated heritage assets;</i> <i>e) Protecting and enhancing the diversity of Our Neighbourhood's natural environment in terms of biodiversity / geodiversity, designated wildlife sites and protected species, seeking biodiversity net gain wherever possible;</i> Policy S2: The Requirement for Master Plans In combination these two policies should be very useful in requiring developments to respond fully to the special historic context of the historic city core, the WHS and its setting.</p>	<p>context of the historic city core, the WHS and its setting.</p>	
<p>SEM3 {Parts copied to Themes 1,2a,2b,3,6,Comments) ... 1. Does the Parish intend to review its proposals in light of the Council's declaration of Climate Emergency? ... 5. I note there is reference to climate change, and the need for energy efficiency, but little mention of the practical infrastructure that will be</p>	<p>C2 Whether the plan takes account of the climate emergency</p> <p>C1b Need for infrastructure to support transition to low carbon</p>	<p>NP Policy S1 h) promotes on-site renewable and low carbon energy generation wherever possible. Not all locations are suitable for solar panels and there are restrictions in Conservation Areas.</p> <p>The first theme of the NP sets the tone and it is all about sustainable development. The text will be strengthened to emphasise the importance of combating climate change</p> <p>These infrastructure issues are</p>

<p>required to support this transition to low carbon. There will be a need for electrical charging infrastructure and heat networks to be installed, and there should be an explicit requirement for every new building to have photovoltaic cells and designed for low/zero carbon heating sources. This needs to be strengthened within all County Plans.</p>		<p>matters for DCC</p>
<p>SEM16 {parts copied to Themes 1,2b,3,4,5, Comments} The Climate Crisis and the Neighbourhood Plan Recent and growing concern about the climate crisis and the need for rapid transition to a low carbon economy suggests that neighbourhood plans will increasingly be judged by their effectiveness in these matters. Our Plan has been successful in doing this, but could benefit from more direct evidence that it is formative part of the development of the Plan. Here are some suggestions for changes in presentation to bring these concerns into a clearer focus.</p> <p>...</p> <p>Figure 1 – Key Resource Sustainability Issues. Figure 1 could be slightly reconfigured to become ‘The Climate Crisis and the Neighbourhood Plan’ while still referring to the key resource sustainability issues. Somewhere, a direct reference to permeable pavement systems to reduce the probability of local flooding could be added.</p>	<p>C5 Need for clearer focus in text on the plan’s response to the climate crisis</p>	<p>Figure 1 will be strengthened as suggested.</p>
<p>SEM16 /cont (ii) Policy S1: S.D. Requirements Looking at i) and j) again SUDS should be more about permeable pavement surfaces to avoid local flooding than water quality etc which is covered again in i) (perhaps it referred to directly because it is ignored so often in new development)</p>	<p>C3 Suggested changes to Policy S1</p>	<p>NP S1 sub-sections i) and j) will be reworded as suggested</p>
<p>SEM16 /cont (iii) Policy S2; The Requirement for Master Plans The master plans are the main opportunity to encourage exemplary development and should therefore include the test of contributing to the creation of a low carbon economy</p>	<p>C3 Suggested change to Policy S2</p>	<p>NP S2 is strongly challenged by other respondents and is likely to be subject to revision. This suggestion will be considered as part of that process. However, NP S1 is already strongly focussed on promoting a low carbon economy.</p>

<p>L11 Northumbrian water {parts copied to Themes 1,2b,3,4,Comments}</p> <p>We support Theme 1 and the associated policies. We welcome recognition of the importance of developing the city to be resilient to flooding, to minimise waste and pollution and to adapt to climate change. We welcome the clear criteria set out relating to “Flood Risk” underneath policy S1 where paragraph 8 clearly states that parts of the Neighbourhood area are “at risk of surface water flooding when heavy rainfall causes flooding from sewers, drains, groundwater and runoff from land, small watercourses and ditches”. We trust that this will encourage developers and land users to be mindful of all aspects of flooding and the implications which can arise.</p>	<p>C2 Support for NP S1 in general and with particular regard to flood zones</p>	<p>Coming from Northumbrian Water, this endorsement of Policy S1 is important in view of other criticisms of the plan’s treatment of flood zones.</p>
<p>L11 /cont (i) We encourage all policies to adopt the principles of sustainable drainage and water management in order to support climate change, resilience and minimise flood risk. In advance of the County Plan being adopted with its County wide Water Management and Water Infrastructure policies these principles should be clearly identified within the Neighbourhood Plan.</p>	<p>C5 Need to reference principles of sustainable drainage and water management</p>	<p>The text about Flood Risk in Figure 1 will be amended to reference these principles (see footnote 132 on page 195 and footnote 135 on page 197 of the CDP)</p>
<p>L2 {parts copied to Themes 1,2b,4,5,6, Comments}</p> <p>The City of Durham TrustThe Trust welcomes Policy S2 that proposals for “large” planning developments should submit a “masterplan” outlining the overall scope and final impact of a project, such that large scale change cannot occur by piecemeal development, as was recently the case with the damage wrought to the Green Belt by the large sports facilities near Maiden Castle.</p>	<p>C2 Support for Policy S2</p>	<p>Support for NP S2 noted. This is important in view of other criticisms of this policy.</p>
<p>L9 {parts copied to Themes 1,2a,2b}</p>	<p>C3 Need to reference the sequential test in flood zones</p>	<p>Some amendments to NP S1 j) have already been noted in response to</p>

<p>These representations have been prepared on behalf of our Client, Kier Property Ltd, in response to the Durham City Neighbourhood Draft Plan (“DCNDP”) Consultation. ...</p> <p>S1 – Sustainable Development Requirements</p> <p>Part j) of this policy requires development to, amongst other criteria to reduce climate change by:</p> <p><i>“Avoiding sites in the Flood Zones 2 and 3, and incorporation of the sustainable urban drainage system (SUDS) to achieve improvements in water quality, aquatic ecosystems, and habitats in order to increase resilience to climate change”.</i></p> <p>It is noted that Figure 1 which identifies Key Resource Sustainability Issues makes reference to paragraphs 157 to 164 of the NPPF regarding the requisite sequential test. The different levels of vulnerability to flooding are also noted with commercial development recognised as “less vulnerable”. However, Kier Property Ltd consider that the Policy wording in its current form does not meet the basic legislative conditions as required and objects to its inclusions within the Neighbourhood Plan unless suitable amendments are made. In the absence of a direct cross reference to Figure 1 and to ensure that this policy is clear it is important that the Policy wording itself accords with national policy and makes clear reference to the sequential test. As such, we suggest the following amendment to the Draft Policy wording:</p> <p><i>j) Applying the Sequential Test and if necessary the Exceptions Test (as required by paragraphs 158, 159 and 160 of the NPPF) with the aim of directing development away from the Flood Zones 2 and 3 where possible and necessary taking into account the level of flood risk vulnerability for the relevant land uses.</i></p> <p><i>[New sub paragraph k] incorporation of the sustainable urban drainage system (SUDS) to achieve improvements in water quality, aquatic ecosystems, and habitats in order to increase resilience to climate change.</i></p> <p>...The suggested amendments above would also ensure that the DCNDP are better aligned with Draft Strategic Policy 36 (Water Management) of the Draft County Durham Plan (DCDP) which also refers to the need for Sequential and Exceptions tests where appropriate.</p>		<p>comment SEM16. The comments here will be addressed at the same time, but we also need to take account of the fact that The Environment Agency (L7) and Northumbrian Water (L11) have expressed support for the way NP S1 deals with flood risk.</p>
<p>L9 /cont (i)</p>	<p>C3 Need to define “large”</p>	<p>We shall address this by adopting</p>

<p>S2 – The Requirement for Masterplans</p> <p>The requirement for Masterplans for all “large sites” is noted in Draft Policy S2. However, the definition of what constitutes a large site is ambiguous for the purposes of this Draft Policy, both within the Draft Policy text or the accompanying justification. As such, Kier Property Ltd object to the Draft Policy as presented. Paragraph 16 notes that Plans should:</p> <p><i>a) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals [Savills emphasis];</i></p> <p>In order to demonstrate regard for national planning policy, a clear definition of what constitutes a large site should be provided. Alternatively the specific sites subject to masterplan requirements should be named and reasoning provided. The Policy justification as drafted makes reference to sites whereby Durham City Parish Council consider that masterplanning would be necessary, namely Milburngate House, Aykley Heads, Mount Oswald, Mountjoy, Hild/Bede and Elvet Riverside but also notes that “other sites may become available in the future”. In the absence of clear criteria, a decision maker or developer presented with development opportunities elsewhere would not be able to establish at the outset whether this Policy applied to other sites within the City.</p> <p>...We note that paragraph 16 of the NPPF also requires Policies to ensure “proportionate and effective” engagement between plan makers and communities. The potential requirement for all development sites in the City Centre to be subject to masterplanning is not proportionate, particularly as many are of a size that would likely come forward as part of a full, detailed planning application. Masterplans are typically required for large scale major developments that come forward in outline form or as part of a large scale strategic allocation within the DCDP.</p>		<p>DCC’s definition of a “major development” in the Glossary of the CDP. It matches the definition in the Glossary of the NPPF.</p> <p>Support for NP S2 comes from other respondents: The City of Durham Trust (L2), Historic England (L8a) and the WHS Co-ordinator (L18).</p>
<p>L17 {parts copied to Theme1,2a,2b,3,4,Comments}</p> <p>We respond on behalf of our client Southlands Management Ltd who are property owners in the City. ...</p> <p>Theme 1</p> <p>We recognise that Policy S1 has been amended in response to earlier</p>	<p>C2 Support for Policy S1</p>	<p>Support for NP S1 noted.</p>

<p>comments made by our client and this is welcomed. We note that Policy S1 has been expanded to incorporate former Policy S2 and Policy S2 is essentially a new policy which sets out the requirements for Master plans. Policy S2 states that “<i>A master plan for all large sites will be required where new development presents issues about....</i>”. Our client considers that it would be helpful for the policy or supporting text to define a ‘large’ site with justification.</p>	C3 Need to define “large”	This raises the same issue that “large” is not defined in NP S2 and it will be addressed as outlined above.
<p>L4 Comments by Mr G.B.Pickering George Brian Pickering Treasurer Durham City Access For All {parts copied to Themes 1,4,5} Access to Buildings ...Making places or buildings accessible to all makes life easier for everyone. You just have to look at how many customers prefer to use the automatic doors compared to those using the normal doors. It helps the mother pushing a pram or someone with both hands full of shopping as well as the disabled. ...It is important with new builds and refurbishments for the plans to be checked by a qualified access consultant rather than an architect who thinks he knows. After the work is completed it is difficult and expensive to rectify mistakes. {see also coverage under Theme 4}</p>	C2 Concern about accessibility	Sub-section m) of NP S1 addresses the need for accessibility for all. The text of 4.14 will have an additional aspect of good practice mentioned, namely the need to use a qualified access consultant.
<p>L8a Historic England {parts copied to Themes 1,2a,2b,3,4, Comments} Policies S1 and S2. I note the rearrangement of Policies S1 and S2, but also that some of our comments have yet to be tackled. For example, the very important word ‘significance’ is still missing and ‘preservation’ is still being used, albeit alongside the more suitable ‘conservation’. We set out our reasons for suggesting vocabulary changes in our previous letters.</p>	C3 concern about precise wording	The suggestions only impact on NP S1 and we will make the necessary changes
<p>L8a /cont (i) This objective of Policy S2 is welcome as a way of mitigating the potential impact of development on the historic environment, but it may need</p>	C2 Support for S2 C3 Need to strengthen S2	Support for NP S2 noted Suggested amendment will be

amending to ensure it delivers on the objective of securing a masterplanning approach to key sites ahead of seeking consent.		considered alongside other possible changes to NP S2.
<p>L5b Durham County Council {parts copied to all Themes}</p> <p>Theme 1 General: LPA Comment Flood Risk – pg26-27. It should be noted that the referencing within section 8 to the SFRA is not particularly clear as the AECOM report supersedes the Golder report. Section 9 the text refers to the introduction of higher standards, but it is unclear where these originate from. Where sites are allocated in the neighbourhood plan and it states that the site should be subject to a flood risk sequential test this should have been carried out before they were allocated. It is unclear as to whether this has been done.</p>	C5 Several criticisms of the text about flood risk.	<p>The reference to the SFRA will be updated.</p> <p>The reference to higher standards will be removed.</p> <p>None of the allocated sites (D1.1, D1.2 and D1.3) are in flood risk zones.</p>
<p>L5b /cont (i) S1 LPA Comment The first sentence of the policy would benefit from being simplified. Suggested Action <i>Amend to ‘All development proposals must, where relevant demonstrate the following principles’</i></p>	C3 Need to simplify the introduction to S1	We will accept this suggestion
<p>L5b /cont (ii) S1 LPA Comment As written criteria d & e require proposals to both conserve and enhance which is too high a test. Suggested Action Amend text to make it clear that requirement to ‘conserve’ and ‘protect’ are the minimum required to accord with the policy criteria.</p>	C3 Concern that S1 sets too high a standard in criteria d) and e)	<p>Enhancement is one of the objectives of this policy and it is arbitrary to say it is too high a test. Chapter 16 of the NPPF is entitled <i>Conserving and enhancing the historic environment</i>.</p> <p>No change</p>
<p>L5b /cont (iii) S1 LPA Comment Criterion h is above Building Regulation requirements. As such, justification is required in the supporting text. Viability constraints need to be factored in to this requirement. Suggested Action Provide justification in supporting text.</p>	C5 Justification needs strengthening	<p>The policy includes the caveat “wherever possible” and that will allow for viability constraints. DCC has declared a climate emergency and we need to go beyond Building Regulation requirements wherever possible. This will be justified in a strengthened para 4.14.</p>

<p>L5b /cont (iv) S1 LPA Comment Criterion j does not accurately reflect current flood risk guidance which distinguishes between flood zones 2 & 3. Suggested Action Amend wording of criteria j to better reflect current guidance on this matter.</p>	<p>C3 Concern about flood risk guidance given in criterion j) of S1</p>	<p>Several earlier comments (SEM16) and (L9) have already mentioned criterion j). This comment will be addressed at the same time.</p>
<p>L5b /cont (v) S1 LPA Comment In Criterion k the reference to public art needs to be more specific in delivery terms i.e. should it be on site or a commuted sum and viability needs to be factored in.</p>	<p>C3 Concern that the reference to public art needs improving</p>	<p>The reference to public art does need to be reconsidered and perhaps expanded to provide more justification and context.</p>
<p>L5b /cont (vi) S1 LPA Comment Some of the sites the neighbourhood plan lists as allocations do not fit with the criteria of this policy. It is not clear what this policy adds over and above the sustainable design policy in the emerging CDP. Different ways of saying the same thing could cause confusion in the application of this policy.</p>	<p>C3 Effectively calls for the deletion of the policy</p>	<p>It is impossible to assess the first statement in this comment without more detail; there are only three allocated sites. Policies in the emerging CDP carry no weight at this time. No change</p>
<p>L5b /cont (vii) Para 3 figure 1 LPA Comment This is currently being reviewed and the is text will therefore quickly become out of date. Suggested Action Check accuracy of text before publication of next version of DCNP.</p>	<p>C5 Criticism that the text refers to a document that is currently under review</p>	<p>We can only use the most up-to-date documents currently available. No change</p>
<p>L5b /cont (viii) S2 LPA Comment From a procedural perspective any such masterplan or absence of a one would not amount to be a material planning consideration. Suggested Action Reconsider this as supporting text.</p>	<p>C3 Comment that a masterplan is not a material planning consideration.</p>	<p>Although this comment suggests a change to the supporting text, it amounts to requiring a change in the policy wording. This will be considered alongside possible changes to NP S2 (see L8a above).</p>
<p>L5b /cont (ix) S2 LPA Comment It is unclear as to when this policy would be relevant in the absence of a</p>	<p>C3 Need to define “large” in S2</p>	<p>We shall address this by adopting DCC’s definition of a “major development” in the Glossary of the</p>

<p>definition for 'large'. This will hinder implementation of the policy.</p> <p>Suggested Action Provide a definition of large within the policy.</p>		CDP. It matches the definition in the Glossary of the NPPF.
<p>L5b /cont (x) S2 LPA Comment Is the reader to interpret that every 'large site' would trigger one of those by default or that a 'large site' could come forward without a masterplan if it didn't trigger one of those criteria? As worded, if there is no issue around the disposition of buildings or traffic <u>within</u> the site a <u>major</u> impact on the adjacent areas or there would be intrusive in views of the WHS then a masterplan would not be required.</p>	C3 Criticism of the text of S2	This will be considered alongside possible changes to NP S2
<p>L5b /cont (xi) S2 LPA Comment The policy does not include any means to assess the masterplan.</p> <p>Suggested Action Relevant policy criteria should be included.</p>	C3 Criticism that S2 doesn't include assessment criteria	This will be considered alongside possible changes to NP S2
<p>L5b /cont (xii) S2 LPA Comment In the interests of clarity, the issues triggering the policy would benefit from being shown in a bulleted list.</p> <p>Suggested Action Amend layout.</p>	C3 Suggested amendment to the policy layout of S2	This will be considered alongside possible changes to NP S2
<p>L5b /cont (xiii) S2 LPA Comment The final 2 sentences are not written as policy and relate to procedural matters.</p> <p>Suggested Action Move text into the justification.</p>	C3 Suggested transfer of some text of S2 to justification	This will be considered alongside possible changes to NP S2
<p>L5b /cont (xiv) S2 LPA Comment It is also not clear from the policy/supporting text how the developers will be required to 'submit the masterplan and any subsequent changes to public scrutiny'.</p>	C3 Lack of detail in policy S2 about public scrutiny	This will be considered alongside possible changes to NP S2

<p>L6a Durham University {parts copied to all Themes, Comments} Page 23 - Policy S1 <i>The responsible use of resources and increase in resilience to climate change by:</i> <i>j) Avoiding sites in the Flood Zones 2 and 3, and incorporation of the sustainable urban drainage system (SUDS) to achieve improvements in water quality, aquatic ecosystems, and habitats in order to increase resilience to climate change.</i> Whilst the NPPF outlines at paragraph 155 that inappropriate development in areas at risk of flooding should be avoided, it notes that development can be necessary in these areas and that the sequential test, and exceptions test (where necessary) should be applied for proposals in flood risk areas (paragraph 157). This policy should be re-worded to reflect the NPPF</p>	<p>C3 Criticism that policy S1 doesn't reference the sequential test for flood zones</p>	<p>This comment will be addressed alongside comment L9</p>
<p>L6a /cont (i) Policy S2 The policy requirement for a masterplan to be produced and used as a material consideration in the determination of applications is not considered necessary or to be in accordance with the NPPF.</p>	<p>C3 Policy S2 not considered necessary</p>	<p>This will be considered alongside possible changes to NP S2</p>
<p>L6a /cont (ii) Policy S2 The policy specifically mentions issues relating to traffic, impacts on views and landscape, all of which are material considerations and would be taken into consideration and assessed during the determination of any detailed planning application.</p>	<p>C3 Policy S2 not considered necessary</p>	<p>This will be considered alongside possible changes to NP S2</p>
<p>L6a /cont (iii) Policy S2 Furthermore, the policy is not specific. The PPG outlines at paragraph 041 that neighbourhood plan policies should be 'clear and unambiguous' and should be 'drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning application.' In this case, there is a lack of clarity as to when a masterplan</p>	<p>C3 Policy S2 not considered sufficiently specific</p>	<p>This will be considered alongside possible changes to NP S2</p>

would be required and it is therefore not considered to accord with guidance in the PPG.		
L6a /cont (iv) Policy S2 Notwithstanding, this policy is not considered to accord with the NPPF and PPG and should be removed.	C3 Policy S2 not considered necessary	This will be considered alongside possible changes to NP S2
L6a /cont (v) Page 27 Paragraph 4.23 This paragraph makes reference to several University sites, including Mountjoy, Hild/Bede and Elvet Riverside. Development of these sites is addressed within the Durham University Estate Masterplan which already sets out the intentions for the sites.	C5 Criticism of references to several university sites requiring masterplans	This will be considered in the light of possible changes to NP S2
L6a /cont (vi) Page 27 Paragraph 4.23 Furthermore, and as outlined above, consideration to issues including impact on the WHS and views and design will be fully considered and addressed as part of any planning application.	C5 Criticism of justification text	This will be considered in the light of possible changes to NP S2
L6a /cont (vii) Page 27 Paragraph 4.23 Planning applications will be determined in accordance with section 4 of the NPPF (decision-making) and will satisfy the appropriate tests and level of detail required on a site by site basis. This includes giving due consideration to design policies and guidance, including relevant management plans and conservation area appraisals. As such there should not be a separate requirement for a masterplan and this approach is not supported by the NPPF.	C3 Policy S2 not considered necessary	This will be considered alongside possible changes to NP S2