

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

Theme 5 - City With a Modern and Sustainable Transport Infrastructure

10 September 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:

- L2 = City of Durham Trust
- L3 = Durham Cathedral
 - L3a = Durham Cathedral Letter dated 05/07/2019
- L4 = Durham City Access For All
- L5 = Durham County Council
 - L5b = Durham County Council Appendix
- L6 = Durham University
 - L6a = Durham University Response
- L10 = Nevilles Cross Community Association
- L14 = Resident 3
- L15 = Resident 4
- L16 = St Nicholas Community Forum
- 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 5

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	CATEGORISATION	PLANNING ISSUE OR ACTION IDENTIFIED
COMMENTS RELEVANT TO THEME 5		
<p>SEQ6 Two of my agreements are only partial: ...T2 {also added to Theme 2b}, because I would welcome more safeguards against the erosion of small but valuable green areas or patches by parking bays (planning applications for such bays seem to go through on the nod at the moment). However, this may be more of a problem for places beyond the central area of the City. {Resident DH1}</p>	c3. Concern regarding loss of small green spaces to car parking in relation to Policy T2.	The wording in T2 about designated parking bays was intended to apply to provision in new streets. The policy wording will be adjusted to make this clear.
<p>SEQ6 Finally, I applaud the work of the PC in doing what it can to make the city a better place for walkers and cyclists. Like many older cities though, Durham has many inherently attractive streets whose appearance is more or less ruined by their having to double as long, thin car parks, even while small areas of grass around the city are eaten into by small parking bays. I know there is a limited amount a parish council can do about this kind of thing, but I welcome all the measures in the Plan that can mitigate the domination of public space by these ugly, dirty and destructive machines. {Resident DH1}</p>	<p>c2. Support for walking and cycling provision. Addressed in policy T1.</p> <p>c2. Support for reduction of visual impact of car parking. Addressed in <i>Looking Forwards</i> Initiative 17.</p>	Support noted.
<p>SQ2 {Parts copied to Themes 3,5,6} Travel could be better - diamond buses are not good - should be Go-Northern buses. {No 'your details' given}</p>	c1a. Dissatisfaction with bus services, including Diamond route – a Go North-East service from Durham to Stanley via Sacriston.	<p>Improvements to this route might be achievable via planning conditions related to the proposed housing site at Sniperley, for example, but this is outside the Neighbourhood Plan area.</p> <p>Comment noted.</p>

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<p>SQ3 Durham is not a cycling city unless cars and motor traffic do not use it - which is incompatible with modern life. Though this can be modified (Park & Ride etc) we must remember undergrads are here for six months of the year and there is very little movement on foot or cycle during the summer term. NB Church Street. There is life - businesses, weddings, deaths, church, community activities which are just as valid as the convenience of students. {Resident}</p>	<p>c1c. Against cycling provision. c1c. Against provision for student travel. c1c. Concern about Church Street.</p>	<p>Changes to traffic management on existing transport networks are for the highways authority to deal with. The Neighbourhood Plan can influence, but not prescribe the actual solution, in cases where development has an impact on existing networks. The plan highlights localised issues that might need to be addressed when considering development proposals.</p> <p>Comment noted.</p>
<p>SQ5 Plans for cycle routes are totally unsuitable. Cycling should not be encouraged in Durham City. Durham is not a cycling city. {Resident DH1}</p>	<p>c1c. Against cycle routes. c4. See Initiative 16: Walking and Cycling Durham in 'Looking Forwards'.</p>	<p>Creation of cycle routes is the responsibility of the County Council as highways authority.</p> <p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights localised issues that might need to be addressed when considering development proposals.</p> <p>Promotion of sustainable transport, including cycling, is national and county policy. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not</p>

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		<p>prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.</p> <p>No action.</p>
<p>SQ15 {Parts copied to Themes 4,5,6} Strong support for ... T1, ... {Work / run business DH1}</p>	<p>c2. Supports T1</p>	<p>Support noted.</p>
<p>SQ20 {Parts copied to Themes 3,5,6} T2: Not clear. {Resident DH1}</p>	<p>c3. Suggests Policy T2 could do with clarifying.</p>	<p>Parts of Policy T2 have been reworded to clarify the policy intent.</p>
<p>SQ23 {Parts copied to Themes 2a,2b,3,4,5} 5 T1. No cycling in City centre. <u>All</u> cyclists to obey highway code. {Resident DH1}</p>	<p>c1c. Against cycling in city centre. Banning cycling on parts of the road network is the responsibility of the County Council as highways authority.</p> <p>c1c. Compliance with the Highway Code is not a planning issue.</p> <p>c4. See Initiative 16: Walking and Cycling Durham in 'Looking Forwards'.</p>	<p>The Neighbourhood Plan contains no policy to create specific cycle routes. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.</p> <p>Comments noted.</p>
<p>SQ24 {Parts copied to Comments, Theme5} Maybe should include working towards clean air in the City Centre & reduction of heavy traffic. Perhaps a weight restriction could be a target!? Many places do this. {Resident DH1}</p>	<p>c2. Concern over air quality.</p> <p>c1c. Air quality management is the responsibility of the County Council.</p> <p>c1c. Weight restrictions are the</p>	<p>Policy T1 addresses air quality by promoting sustainable transport accessibility and design for new developments.</p> <p>Comments noted.</p>

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	<p>responsibility of the County Council as highways authority.</p> <p>c4. See Initiative 3: Clean Air Durham in 'Looking Forwards'</p>	
<p>L18 WHS Coordinator {parts copied to Themes 1,2a,2b,3,4,5, Comments} 4.5 Theme 5: A City with a Modern and Sustainable Transport Infrastructure Policy T1: Sustainable transport accessibility and design Policy T2: Residential Car Parking The policies focus on new development and scope for immediate impact on the WHS is reduced due to the limited development potential in the key townscape setting areas. There is generally great merit in improving access and broadening the methods of access without reducing the capacity of the City to attract and draw in visitors. This would help in the attractiveness of the City and access to the WHS for the visitor. There are issues of excessive traffic on Saddler St/Owengate and at times the North Bailey. Access is vital for many functions on the Peninsula and for visitors. Support for balanced solutions under Policy T1 would be welcome.</p>	<p>c2. Notes limited scope for transport policies to influence WHS and its townscape setting. Supports broadening methods of access while maintaining capacity for visitors. Concern over excessive traffic on the peninsula but notes vital need for access for many functions. Balanced solutions will be required.</p>	<p>Comments noted. Policy T1 addresses the need for access while balancing provision in favour of sustainable transport in accordance with national and local policies.</p>
<p>SWC1 As part of the healthy lifestyle there should be a policy of extending the cycle network across the neighbourhood and also amend the current cycle network to make it safe and cohesive.</p>	<p>c3. In favour of extending and improving the cycle network.</p> <p>c4. See Initiative 16: Walking and Cycling Durham in 'Looking Forwards'.</p>	<p>The Neighbourhood Plan contains no policy to create specific cycle routes. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.</p>

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		<p>Changes to traffic management on existing transport networks are for the highways authority to deal with. The Neighbourhood Plan can influence, but not prescribe the actual solution, in cases where development has an impact on existing networks. The plan highlights localised issues that might need to be addressed when considering development proposals.</p> <p>No action.</p>
<p>SEM5 {parts copied to Theme 5. Comments} It is good to see the emphasis within the plan on sustainable transport, and the identification of areas for improvement.</p>	c2. Support for transport policies.	Support noted.
<p>SEM5 /cont (i) The map of cycling provision in Appendix D is particularly instructive, though it is unclear how the information contained within it will be used to guide the improvement of provision.</p>	c5. Concern that mechanism for use of Appendix D maps is unclear.	<p>Add to paragraph D.8:</p> <p>Full background information is available in the Walking and Cycling Evidence Paper (Durham City Neighbourhood Plan Working Party, 2019b). See paragraph 4.229 for how the evidence is to be used in support of Policy T1.</p>
<p>SEM5 /cont (ii) I would suggest that indicator of change number 13 in Chapter 5, "Achievement of a high level of access by all modes of sustainable transport", could be improved as a measure of success: would it be more appropriate to aspire to a higher level of use of all modes of sustainable transport? If the provision of access does not translate to an increase in use, then this could indicate that the level of provision</p>	c5. Suggests change to wording of indicator.	The 13 indicators in Chapter 5 relate to change resulting from new development. The detail of the indicators is to be developed by the Parish Council. While it would be worthwhile to monitor the trends in overall use of sustainable transport

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<p>remains inadequate, or that the resources deployed in providing the provision could have been better used.</p>		<p>within the parish, this would be resource-intensive. The Durham City Sustainable Transport Delivery Plan 2019–2035 proposes monitoring only of school and employment travel via existing surveys.</p> <p>Indicator 13 could be based on an assessment of the access achieved in new developments, which would directly relate to the plan policies, particularly policies T1 to T3. This would be both easier to compile as an indicator and more direct as a means of monitoring the policies.</p> <p>It is accepted that provision of high quality access might not translate into a high level of sustainable transport use for any one site. The quality of the wider network, road congestion and the availability of car parking will also be major factors.</p> <p>The indicator will be amended to read “Achievement of high quality access by all modes of sustainable transport”.</p>
<p>L14 Resident 3 {parts copied to Themes 2b,5} This is to emphasize the importance of Clay Lane (Public Footpath No. 15) ...</p>	<p>c2. Concern regarding cycling and behaviour of cyclists on Clay Lane.</p> <p>c5. Objection to inclusion of Clay Lane in Map 10: Cycling Issues.</p>	<p>In Map 10 the footpath section of Clay Lane is only identified as an area where cycling is restricted. It is not allocating it for use as a cycle route, as that would be a matter for the County Council as</p>

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<p>In recent years a considerable problem has developed caused by cyclists on the footpath. Cycling was banned here by local police in the 1980s, occasionally with strong reprimands for those who ignored this, but now there are not only cyclists, but frequently cycling in an antisocial way. Pedestrians are forced aside and oncoming lights on fast-moving bicycles in the dark are sometimes so bright that the pedestrian has to step into the shrubbery.</p> <p>The inclusion of Footpath No. 15 into a city-wide cycling network has never been presented formally to Durham City Parish Council, This path is shown by Durham County Council on the “Definitive map for County Durham”, as “public footpath - walkers only”. As a Public Footpath, maintenance of unimpeded right of way for “walkers only”, rests with the Local Highways Authority- Durham County Council.</p>		<p>highways authority.</p> <p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights, via the maps, localised issues that might need to be addressed when considering development proposals.</p> <p>Comment noted.</p>
<p>SEM9 {parts copied to Themes 2a,3,4,5,Comments} <i>The push towards cycling as an activity</i> This enthusiasm should also be halted to ensure that such a dangerous and pedestrian-unfriendly pursuit is confined to formal velodromes and cycle tracks. Cycling races and festivals in the City should be banned. One does not dispute the potential health benefits of cycling, but locally streets are rendered dangerous for the older population and there might usefully be a move to ensure that cyclists push their machines through the City, rather than riding them.</p>	<p>c1c. Suggests banning cycling on all roads and paths (except cycle tracks), and banning races and festivals.</p> <p>c2. Against cycling provision on the grounds of danger to pedestrians.</p>	<p>Promotion of sustainable transport, including cycling, is national and county policy. Policy T1 addresses the various needs of different users in access to and within new developments, and the plan encourages developers to consider issues where these needs conflict by recommending suitable design guidance. The policy does not seek to cater for sporting forms of cycling, but for cycling as transport. Paragraph 4.236 specifically addresses when it is desirable to separate pedestrian and cyclist facilities.</p> <p>Comment noted.</p>
<p>SEM10 Network Rail</p>	<p>c3. Requesting support for additional car parking at Durham railway station</p>	<p>It is considered that proposals for additional car parking can be</p>

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<p>Thank you for consulting Network Rail on the proposed Durham City Neighbourhood Plan, we made representations on the plan in 2017 and are comments on this draft plan remain the same. We would ask that you take due consideration of these.</p> <p>Whilst there is mention of the railway there are no specific policy features regarding the railway.</p> <p>As you will be aware there is high demand at Durham station for car parking. As such there are aspirations to provide additional car parking at Durham station through the double stacking of the station car park.</p> <p>We would welcome the inclusion in policy T1 -Sustainable transport accessibility and design, for the support of additional car parking at Durham station to aid the use of rail travel which supports the aims of policy T1 for the use of sustainable transport. This will benefit residents of the Durham City itself and the wider community who rely on Durham Station to access the east coast mainline.</p>	to be added to Policy T1.	<p>determined with respect to existing policies in the local plan and Neighbourhood Plan. Including a specific policy in the Neighbourhood Plan would require more detailed evidence to justify the policy and ensure that there were sufficient safeguards against adverse impacts, such as effects on viewpoints and on traffic in the strategic Aykley Heads development site.</p> <p>The Durham City Sustainable Transport Delivery Plan 2019–2035 also has no policies relating to car parking for the railway station, and nor does the emerging County Durham Plan.</p> <p>No action.</p>
<p>SEM12 {parts copied to Themes 2b,5} When I emailed you my comments last week I neglected two issues. One is my support for your emphasis in T1 on prioritising pedestrians, cyclists and public transport users. I endorse all initiatives to enable safer cycling in Durham City.</p>	c2. Support for Policy T1. c2. Support for initiatives to enable safer cycling. See Initiative 16: Walking and Cycling Durham in 'Looking Forwards'.	Support noted.
<p>SEM12 /cont (I) I and other cyclists often use Clay Lane and the path/cycle route from the A167 to the Business School along the side of the old golf course, and feel much safer on these routes than on, for instance, Potters Bank. I would like Clay Lane to be designated as a joint cycle/footpath similar to the old golf course footpath.</p>	c1c. Request for Clay Lane to be designated as shared use for cycling and walking.	The Neighbourhood Plan contains no policy to create specific cycle routes. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this

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		<p>would be beyond the scope of a neighbourhood plan, but identify localised issues that might have to be addressed when considering the impact of proposed development.</p> <p>Changes to traffic management on existing transport networks are for the highways authority to deal with. In Map 10 Clay Lane is indicated as a path where cycling is restricted. Potters Bank is identified as a road with no protected space for cycling, and the route along the side of the old golf course is identified as “currently adequate” for cycling.</p> <p>Comments noted.</p>
<p>SEM13 {parts copied Theme 5, Comments} I feel we do need to ensure a move towards healthier streets for the City and more support for pedestrians and cycling I would hope that we can build on the excellent principles contained in the plan to ensure that cycling and walking are both encouraged throughout the City and notably on off road paths such as the riverbanks, Clay Lane, Mill Hill road and possibly Silver Street /Framwellgate bridge.</p>	<p>c1c. In favour of supporting cycling and walking throughout the city and on off-road paths.</p>	<p>The Neighbourhood Plan contains no policy to create specific cycle routes or to address particular pedestrian issues. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan, but identify localised issues that might have to be addressed when considering the impact of proposed development.</p>

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		<p>The status of each route mentioned in the response has been recorded in Map 10: Cycling Issues.</p> <p>Comment noted.</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. ... Theme 5: A City with a Modern and Sustainable Transport Infrastructure Already refers to a low carbon future in the vision. Just a check on whether this has been followed through as far as it can be in the context that follows ie transport is probably the most important of all means on the transition to a low carbon economy.</p>	<p>c3. Raises the importance of transport policies that assist in achieving a low carbon economy.</p>	<p>The transport policies are based on a user hierarchy which prioritises walking, then cycling, then public transport ahead of the private car, reflecting the relative carbon emissions of each of these modes. This is also supported by Policy S1.</p> <p>The National Planning Policy Framework (para. 109) limits the extent to which development can be refused on the grounds of highway safety or congestion. It is considered that the policies as currently drafted cannot be made any stronger in the context of a Neighbourhood Plan.</p>
<p>SQ26 {parts copied to Themes 3,4,5, Comments} Policy T2: complex wording is confusing. {Resident DH1}</p>	<p>c3. Consider clarifying wording of Policy T2.</p>	<p>Parts of Policy T2 have been reworded to clarify the policy intent.</p>
<p>SQ29 {parts copied to Themes 4,5, Comments} I wish we had more walking & cycling & less cars. You can taste the pollution around Church Street on week days. {Resident DH1}</p>	<p>c2. In favour of walking and cycling. c1c. Concern regarding air pollution in Church Street. Air quality management is the responsibility of</p>	<p>Changes to traffic management on existing transport networks are for the highways authority to deal with. The Neighbourhood Plan can influence, but</p>

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	the County Council.	not prescribe the actual solution, in cases where development has an impact on existing networks. The plan highlights localised issues that might need to be addressed when considering development proposals. Comment noted.
<p>L16 We welcome much of what is in the Draft Neighbourhood Plan, for example the ... promotion of sustainable travel.</p>	c2. Welcomes promotion of sustainable transport.	Support noted.
<p>L2 {parts copied to Themes 1,2b,4,5,6, Comments} The City of Durham TrustThe important topic of highways seems mostly beyond the remit of the plan. Nevertheless, the Trust welcomes the proposals made under the headings of “Sustainability Transport, accessibility and design” (Policy T1)</p>	c2. Support for Policy T1.	Support noted.
<p>L2 /cont (i) One point on residents’ parking (Policy T2) seems worth comment. The plan reads, “When on-street parking is necessary, it should be provided in designated bays.” Is there a need for more guidance on applications relating to the provision of such bays? Residential areas of Durham often have green spaces whose appearance has been gradually damaged over the years by small parking bays eating into them, and applications for more such bays are common. The Plan aims to minimise “[a]dverse transport impacts, including additional circulation and parking space for private motor vehicles.” Might more be done specifically to save these small but valuable parts of the green infrastructure from further encroachment by cars—after all, if someone buys a shed or huge piece of equipment too big for their own property,</p>	c3. Suggestion that Policy T2 be amended to afford greater protection to green spaces.	The wording in Policy T2 about designated parking bays was intended to apply to provision in new streets. The policy wording will be adjusted to make this clear.

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there is no assumption of a right to encroach upon public space?		
<p>L10 Nevilles Cross Community Association {parts copied to Themes 2b,4,5,Comments}</p> <p>RECOMMENDED (ii)That in the light of potential cycle ways, the University’s proposal for superhighway routes, and the danger to pedestrians because of the incline, Clay Lane be specified stated as a pedestrian route and that that appropriate signage be sought to forbid the use of Clay lane for cycling;</p> <p>CHANGES TO THE PLAN The NXCA propose changes to the Plan as follows: <i>That in relation to (ii),</i> Clay Lane be recognised as an important pedestrian route into Durham since the medieval period and continuing to serve as a major pedestrian artery into the city centre but one that is particularly susceptible to downhill cycling and the emerging potential of student superhighway routes into the City. Under T1, and reinforcing para 4.236, Clay Lane should be specifically noted and signposted as pedestrian-only, confirming the Durham County Council “Definitive map for County Durham” which designates it as “public footpath - walkers only”;</p>	<p>c1c. Concern regarding the potential danger to pedestrians from cycling downhill on Clay Lane.</p>	<p>Clay Lane is included in Map 10: Cycling Issues. However, in this map the footpath section of Clay Lane is specifically identified as an area where cycling is restricted. It is not allocating it for use as a cycle route, as that would be a matter for the County Council as highways authority.</p> <p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights, via the maps, localised issues that might need to be addressed when considering development proposals.</p> <p>Paragraph 4.236 under Policy T1 draws attention to assessing the need for segregation and recommends guidance, in addition noting the gradient of a route as an important factor. If a development came forward which proposed a change of status to Clay Lane in order to provide for cycling, the assessment would also need to consider introducing segregation, or providing alternative cycling routes, along with factors in the</p>

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		<p>guidance such as the expected levels of cyclist and pedestrian flow, visibility, and the presence of vulnerable users.</p> <p>Comment noted.</p>
<p>L3a Durham Cathedral {parts copied to Themes 2b,5,Comments} We discussed parking during the site meeting earlier this week. We all readily agreed that parking in Central Durham is very difficult, and it was with dismay that I learned that this topic does not appear to be given any consideration within the NP. In the context of the increased use of the Market Place for public events, and the impact that vehicular access through Market Place and Saddlers Street generally has, we believe that a suitable analysis and allocation of future parking and access provisions to the World Heritage Site must be undertaken. The only sustainable alternative access to the Peninsula, avoiding the already congested Leazes Roundabout/Durham City Centre, is from Potters Bank/Quarryheads Lane across Prebends Bridge. Any additional planning restrictions to land in that area would seem short-sighted until a sustainable parking and access policy has been agreed. ...As it is, the parking areas of the Playing Field are used for staff parking connected with the School's operations (the daily 'Walking Bus' leaves from/arrives at Prebends Gatehouse on Quarryheads Lane) as well as general staff parking during the rising numbers of road closures to the Peninsula. We consider this approach by the Cathedral to reduce vehicular traffic across Market Place to be of benefit to the community, and cannot see any advantage in the NP's intention to stop further improvements. {See also coverage under Theme 2b}</p>	<p>c3. Concern that local green space designation would prevent the development of playing fields for car parking. Unclear if submission also advocates vehicular access via Prebends Bridge.</p>	<p>Note that existing operational use would not be affected by a Local Green Space designation. Therefore use of a small area at the entrance to the playing field for parking could continue.</p> <p>NPPF re Green Belt allowable development para. 146(c) "local transport infrastructure which can demonstrate a <u>requirement</u> for a Green Belt location" (our emphasis).</p> <p>Therefore development of the playing field into a car park would be considered under this "rule". Two important considerations would be the demonstration of 'requirement' and the maintenance of the 'openness' of the space. Additionally, in respect of the characteristics that make this part of the Local Green Space special to local people, maintenance / improvement of the existing tree / hedgerow cover round the boundary of the site would be necessary to provide masking, to mitigate what would be a significant harm by urbanising what is currently a</p>

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		continuous rural or green space, from the Cathedral itself, across Prebends Bridge and up to the top of Observatory Hill. There would also be a number of obstacles, including impact on the Duke of Wellington junction, reduction in number of playing fields (e.g. OSNA 2018 shows "existing quantitative shortfall in the provision of open space across all types of open space" in the Durham City area), etc.
<p>L4 Comments by Mr G.B.Pickering George Brian Pickering Treasurer Durham City Access For All {parts copied to Themes 1,4,5} With reference to:- a) page 3, para 1.3 "Looking Forwards ; Durham as a Creative and Sustainable City"</p>		Paragraph 1.3 describes "Looking Forwards" as "an opportunity to go beyond the planning policies in identifying the actions and initiatives for statutory, community and other bodies in furtherance of the vision and objectives of the Neighbourhood Plan".
<p>L4 /cont (i) b) page 118, Walking and cycling</p>		Page 118 summarises the policy context of the Durham City Sustainable Transport Delivery Plan, 2019–2035, which informs the Neighbourhood Plan's transport policies and reflects national policy.
<p>L4 /cont (ii) c) page 124, para 44.236 (see maps 9 and 10)</p>		This text notes the need for separation of pedestrian and cycling facilities and refers to Maps 9 and 10 where people's comments have noted places where such protected spaces do not currently exist.
<p>L4 /cont (iii)</p>		Map 10: Cycling Issues in Appendix D

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d) page 177 Map 10: "Cycling issues"		is a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.
<p>L4 /cont (iv) There is a bias for the Parish Council's draft plan to promote cycle routes (disguised as "Cycling Issues") through Durham City to the detriment of pedestrians. The draft plan makes numerous references to "cycling issues" on existing pedestrian only footpaths</p>	<p>c2. Against cycle routes that would cause detriment to pedestrians.</p> <p>c1c. Creation of cycle routes is the responsibility of the County Council as highways authority.</p> <p>c4. See Initiative 16: Walking and Cycling Durham in 'Looking Forwards'.</p>	<p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights localised issues that might need to be addressed when considering development proposals.</p> <p>Promotion of sustainable transport, including cycling, is national and county policy. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.</p> <p>There are four pedestrian-only footpaths on Map 10, which have been marked as routes where cycling is restricted. One further footpath has been marked as "needs improvement" because although the landowner appears to permit cycling, the route is not of adequate width. Any other footpaths included on the map have</p>

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		<p>been designated as shared use by the County Council. Some of these have been marked as needing improvement and have also been included on Map 9: Pedestrian Issues because of poor design or the need for segregation.</p> <p>Comment noted.</p> <p>Durham City Access For All engagement with Initiative 16 would be beneficial.</p>
<p>L4 /cont (v) I previously made comments to the then “Durham City Forum”, (Draft Neighbourhood Plan 2017), public consultation about cycling through Durham City were taken out of context.</p> <p>I wish to make it clear that as member of the “Durham City Access For All “ the group is totally against any shared pedestrian and cycle footpaths.</p> <p>There is a law dating back to 1835 making it an offence to ride on pavements this was amended in 1999 making it a fixed penalty offence. It was obviously thought a danger in 1835 and like many others I think it is still is today. The Highway Code Rule 64 states “you must not cycle on a pavement.” .</p> <p>The idea of say Silver Street being made a mixed use for pedestrians and cyclists we think is dangerous. We have an ever increasing aging population whose reactions are getting slower. By making cycling legal on some pavements I feel that some cyclists will then think they have the right to ride on all pavements. There is signage at both ends of Silver Street saying cyclist dismount but I see this being ignored on a regular basis.</p> <p>The group represent disabled people with impaired mobility ,wheelchair users, the old, those with sight and hearing problems as well as the general public.</p>	<p>c1c. Against shared pedestrian and cycle footpaths.</p> <p>c1c. Against cycling on Silver Street (for example).</p> <p>c1c. Concern that designation of some pavements as shared use encourages cyclists to ride on all pavements.</p>	<p>In response to this and other comments made during the previous consultation, paragraph 4.236 was added, drawing attention to the need to separate pedestrian and cycling facilities.</p> <p>Where the County Council has designated footways as shared use, the signage is often unclear, and this might lead to cyclists being unsure as to which pavements they are permitted to ride on. The lack of safe alternative provision is also likely to be a factor.</p> <p>Designation of footways (commonly termed pavements) as shared use is a matter for the County Council as highways authority. Restrictions on use of highways by particular types of vehicle or at particular times is also a matter for the County Council as highways authority. Enforcement of</p>

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<p>For example Guide dogs are trained to walk down the centre of the footpath. One of our group has a Guide dog. His guide dog gets confused and worried by cyclists on pavements.</p> <p>The mixed use pavement at the North Durham Hospital is an instance where this has occurred.</p> <p>Cyclists might feel in danger on the roads but what about the pedestrians who feel in danger of cyclists on the pavement.</p>		<p>these restrictions is not a planning matter.</p> <p>The Neighbourhood Plan cannot (and does not) designate, or recommend designation of, particular routes for cycling or any other means of transport. Changes to traffic management on existing transport networks are for the highways authority to deal with. The Neighbourhood Plan can influence, but not prescribe the actual solution, in cases where development has an impact on existing networks. The plan highlights localised issues that might need to be addressed when considering development proposals, via maps 9 and 10 and the accompanying evidence paper.</p> <p>Comment noted.</p>
<p>L4 /cont (vi)</p> <p>When the Market place was refurbished it was to encourage pedestrians. There are no kerbs on some parts of Saddler street for example. Guide dogs are trained to stop at the kerb and we are all taught from childhood road safety to stop at the kerb and look both ways.</p> <p>Visitors to the City assume this is a pedestrian only zone and get confused and startled when confronted by cars and buses and cyclists using this area.</p> <p>...Prior to it being refurbished we asked for a smoother surface on Silver Street this was ignored. We ended up with a mixture of finishes.</p> <p>...Most pedestrians prefer to use the York stone paved edges or the two narrow smooth sections as it is much easier to walk on these than</p>	<p>c4, c5. Highlights problems in city centre for disabled access, including lack of kerbs on Saddler Street, rough surfaces on Silver Street, advertising boards and other impediments.</p>	<p>Following the 2017 consultation, these issues were added to Map 9: Pedestrian Issues. They are issues 3, 4, 5, 6 and 7 on the more detailed pedestrian issues map in the accompanying "Walking and cycling evidence paper" which is referenced in paragraph 4.229 of the plan.</p> <p>Comment noted.</p>

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<p>the undulating cobble stones Wheelchair and mobility scooter users in particular find the surface difficult. The smooth bits are too narrow for a wheel chair and mobility scooters and the paved edges are cluttered with advertising boards abandoned bicycles, buskers tables and chairs etc.</p> <p>...Wheelchair users as well as those using pushchairs are therefore forced to use the cobbled sections and get a very rough ride. For those with bad backs in particular this exacerbates their problems making it a no go area for some.</p>		
<p>L4 /cont (vii) Disabled Parking. The group has regular issues about the lack of disabled parking in the City. Disabled parking was removed from the market place When it was refurbished and has not been replaced elsewhere. For those Wishing to worship or Visit the Cathedral there are only a few disabled places at the rear of the Cathedral and these are often occupied by skips. Parking at the Palace Green is impossible . The University/Cathedral seem unwilling to help sort it out.</p>	c1c. Concern regarding disabled parking to access the Cathedral.	<p>Provision of parking spaces to access existing properties is not a planning matter. Policy T1 includes the requirement that access should meet the travel needs of people with mobility impairments, but this will only apply to consideration of development proposals.</p> <p>Comment noted.</p>
<p>L5b Durham County Council {parts copied to all Themes, Comments} Theme 6 {actually Theme 5} General LPA Comment Extension of the Controlled Parking Zone is entirely a matter for the County Council. Suggested Action The references regarding extension to the parking zone should be deleted.</p>	c3. Objection to text in policy T2 regarding extension of the Controlled Parking Zone (CPZ).	<p>The text in this policy under (e) is intended to enable the County Council to obtain costs for CPZ extension from developers where necessary, and was added following the 2017 Regulation 14 consultation in response to several comments from the public.</p> <p>The policy does not take the decision as to whether to extend the CPZ away from the County Council. The circumstances listed in e.1 to e.4 give examples as to circumstances in which</p>

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		<p>extension may be appropriate. It will usually be of benefit to residential amenity to control parking in these circumstances. The policy is intended to ensure that the planning authority has the necessary leverage to arrange for extension of the CPZ at the developer's expense, rather than having to respond to the situation at tax payers' expense after a development has been completed.</p> <p>There are examples of recent developments of student accommodation in the City of Durham parish which have exacerbated parking issues on neighbouring streets where parking was uncontrolled. The University policy of not permitting parking by students on its premises has created conflict with the parking requirements of neighbouring residents.</p> <p>The policy also provides a mechanism whereby non-student development with reduced levels of parking may be considered. Although reduction of parking at point of origin has been discouraged by central government, it is not prohibited, and the key consideration is whether parking in the area is controlled. This policy therefore helps to further the sustainable transport objectives of the plan.</p>

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		<p>It is proposed to add a reference to the role of the Highway Authority to the policy text.</p> <p>(Council would still prefer that this section be deleted.)</p>
<p>L5b /cont (i) Theme 6 {actually Theme 5} General LPA Comment Within Theme 6 it is suggested that new arts facilities in the City Centre need to provide space for passengers to be set down and picked up but bearing in mind the policies encouraging non-car travel, this is a contradiction within the Plan. Suggested Action Resolve contradiction.</p>	<p>c3. Suggests an inconsistency between Theme 5 and Policy C1 point (g).</p>	<p>The main requirement is access for loading and unloading equipment. Access to a development by appropriate transport means is already provided for by Policy T1 and Policy S1.</p> <p>Policy C1 will be amended to retain point (g) but deleting the words “to set down / pick up passengers and” from the text.</p> <p>The same applies to Policy C2(e).</p>
<p>L5b /cont (ii) T1 LPA Comment The county council understands the DCNP aspirations for a transport policy upon accessibility. However, the accessibility of proposed developments and transport assessments, statements and travel plans are considered by the county council to be strategic issues. The inclusion of a policy on these matters is therefore questioned.</p>	<p>c3. Suggesting deletion of Policy T1.</p>	<p>The Submitted Plan carries no weight according to the County Council. Until the County Plan is approved, the Neighbourhood Plan is entitled to set out the planning policies considered to be needed in Durham City.</p> <p>The policy is considered to be in general conformity with the Submitted Plan policies, particularly policies 22 and 30, but adds further provisions. It is also in general conformity with the saved policies of the local plan.</p> <p>No change.</p>

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<p>L5b /cont (iii) T1 LPA Comment The council welcomes the policy's emphasis on sustainable transport and discouraging car travel by removing through routes. However, some supporting text could be added to clarify that a lack of through routes for cars should not mean limiting permeability of the development for pedestrians and cyclists.</p>	<p>c5. Suggests clarifying intention of the restriction of through routes (Policy T1, point (b)) via supporting text.</p>	<p>Propose to amend T1(a) as follows: a) permeability for sustainable modes with safe, direct and continuous routes for walking, cycling and public transport users within the site, connecting with surrounding paths and highways.</p>
<p>L5b /cont (iv) T1 LPA Comment The policy and supporting text contain overlap with the emerging CDP: Policy 22 promotes well designed sustainable transport modes in new residential areas, with a clear hierarchy that favours walking and cycling.</p>	<p>c2. Observation that Policy T1 overlaps with Policy 22 of the emerging County Durham Plan.</p>	<p>Comment noted. As neither plan carries any weight at this stage, any unnecessary overlap should be identified and dealt with later in the plan making process.</p>
<p>L5b /cont (v) T1 LPA Comment It is not clear what is meant by 'Adverse transport impacts, including additional circulation and parking space for private motor vehicles, should be minimised.'</p>	<p>c3. Lack of clarity in wording of Policy T1.</p>	<p>Propose change to wording: Adverse transport impacts should be avoided where practicable. Additional supporting text added following the policy to give examples of adverse impacts and means of avoiding them.</p>
<p>L5b /cont (vi) T1 LPA Comment It may not be possible to link with external foot and cycle networks if such routes are not already present.</p>	<p>c3. Comment regarding policy wording.</p>	<p>This comment has been repeated from the 2017 consultation response, but the wording has been removed from the policy during the revision of the plan, prior to this round of consultation. Comment L5b /cont (iii) above suggests that text along the lines of the previous wording of the policy, which is here criticised, would be desirable.</p>
<p>L5b /cont (vii)</p>	<p>c5. This comment has been repeated</p>	<p>The Council appears to have</p>

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<p>T1 LPA Comment With respect to the supporting text The Active Travel (Wales) guidance has not been adopted by the county council but is used as best practice guidance as part of auditing work on existing routes. There is no justification as to why a developer should be required to assess the quality of existing publicly maintained walking and cycling routes to a development site (paragraph 4.230) including assessment of routes outside of the NP area (paragraph 4.231).</p>	<p>from the 2017 consultation response.</p>	<p>overlooked the fact that paragraph 4.230 has been revised to provide the requested justification. Paragraph 4.230 also notes that the County Council has now adopted the Active Travel (Wales) design guidance via its County Durham Strategic Cycling and Walking Delivery Plan, 2019–2029.</p> <p>If the transport impact of a development is likely to extend beyond the NP area, it is clear that routes outside the area will need to be assessed and no justification is required beyond that given by the 2007 Guidance on Transport Assessment.</p> <p>No action.</p>
<p>L5b /cont (viii) T1 LPA Comment In relation to offsite improvements (paragraph 4.232) it is considered that the issue of how s106 money is to be used is the role of a local authority.</p>	<p>c5. Objection to suggestions on use of s106 money.</p>	<p>Paragraph 4.232 refers to planning obligations in general, not just Section 106 money. The policy text and the supporting paragraph do not alter the role of the planning authority in respect of decision-making regarding off-site improvements. The supporting text is partly written with the lay person in mind to explain how off-site improvements can be delivered through the operation of the policy.</p> <p>Propose adding the words “by the Planning Authority” to make this clear.</p>
<p>L5b /cont (ix) T2 LPA Comment</p>	<p>c3. Objection to policy T2 point (a).</p>	<p>The intention is that the alternative to in-curtilage parking would be provided</p>

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<p>Criterion a: This implies that parking in a proposed development could be accommodated in neighbouring streets, thus putting pressure on the supply for current residents.</p> <p>Suggested Action Delete final sentence.</p>		<p>by the developer as part of the development. The parking would be outside the curtilage of the individual properties, but within the curtilage of the development.</p> <p>Change to wording proposed to County Council and accepted. See (xi) below.</p>
<p>L5b /cont (x) T2 LPA Comment 'Access to off-street car parking should be designed to minimise additional vehicle movements on residential streets.' It is not entirely clear what is meant by this.</p>	c3. Concern over clarity of policy T2.	<p>The intent is to locate the access to off-street car parking so that additional traffic is minimised over existing streets. For example, the car parking for a new development adjoining Ferens Close was located in such a way that users had to drive the full length of Ferens Close, rather than being accessed from The Sands.</p> <p>Supporting text added to clarify intent of clause.</p> <p>(Accepted by County Council.)</p>
<p>L5b /cont (xi) T2 LPA Comment In-curtilage parking must be provided within the curtilage of the dwelling itself; whilst the council appreciates the intention behind the policy, a neighbourhood parking area would not meet the requirement for in-curtilage parking.</p>	c3. Objection to policy T2 point (a).	<p>The intention of this policy is to allow for development of dwellings where the car parking is not provided within the curtilage of individual properties or on the street immediately outside. By providing car parking nearby in a private car parking area for the development, there is more scope for attractive urban design which discourages car dependency. Even a slight separation of car parking from dwellings encourages more social</p>

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		<p>interaction and provides space for children to play outside.</p> <p>Manual For Streets Table 8.2 suggests that off-street communal parking is more efficient in providing car parking spaces than within the individual dwelling curtilage.</p> <p>Proposed: change wording in T2(a) from “a nearby neighbourhood parking area” to “an off-street communal parking area” to match terminology of Manual For Streets and add supporting text in justification.</p> <p>(Proposal accepted by County Council, with the suggestion that additional supporting text be included along the lines of the above justification.)</p>
<p>L5b /cont (xii) T3 LPA Comment The emerging CDP will require 25% of specialist housing for older people to meet building regulations category M4 (3) through Policy 15. The M4 (3) standard requires space for storage and charging of mobility aids, and transfer between them (e.g. indoor to outdoor wheelchair). The intent of this policy is supported, however the need for all homes to provide such storage is questioned. The supporting text should include more detail on the need for this requirement, or it should be removed from the policy.</p>	<p>c3. Questions the need for all homes to provide mobility aid storage, with reference to emerging County Durham Plan.</p>	<p>Note that storage was expected to be used for a variety of purposes by householders.</p> <p>Propose slight changes to wording to avoid imposing additional space requirements, but encouraging flexibility in use for the storage space required to be provided for cycle storage.</p> <p>(Accepted by County Council.)</p>
<p>L5b /cont (xiii) T3 LPA Comment The council support the proposal to require secure cycle storage to be</p>	<p>c2. Support for cycle storage requirements of Policy T3.</p>	<p>Support noted.</p>

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provided as part of new residential developments.		
<p>L6a Durham University {parts copied to all Themes, Comments} Page 117 :-Theme 5: Paragraph 4.232 Segregation from motor traffic is key to providing attractive and subjectively safe cycle routes that all people will want to use, leading to a modal shift to sustainable transport.</p>	c2. In favour of cycle routes that are segregated from motor traffic.	Comment noted.
<p>L6a /cont (i) Page 117 :-Theme 5: Paragraph 4.232 The University recognise the importance of this and are currently developing the 'super route' running alongside South Road from Mount Oswald to Lower Mountjoy.</p>	c2. University is developing a cycle and walking route parallel to South Road.	<p>Comment noted.</p> <p>Map 10 will be updated to reflect the improved circumstances.</p>
<p>L6a /cont (ii) Page 117 :-Theme 5: Paragraph 4.232 There are several informal off-road routes in the City which are used by University staff & students, such as Clay Lane used Ustinov College students, and we would welcome these route being formally dedicated as cycle tracks to allow use by cyclists.</p>	c5. Request that off-road routes be formally dedicated as cycle routes.	<p>Some of these routes are included in Map 10: Cycling Issues, including Clay Lane. However, in this map the routes are only identified as areas where cycling is restricted. The map is not allocating it for use as a cycle route, as that would be a matter for the County Council as highways authority.</p> <p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights, via the maps, localised issues that might need to be addressed when considering development proposals.</p>

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		Comment noted.
<p>L15 Theme 5: “.... Sustainable Transport Infrastructure” 1. Objectives 4.213 page 117 Can the policies within the Draft Plan hope to meet the objectives? Whilst each of the stated objectives are very desirable, just a superficial, forensic examination of the contemporary issues confronting Transport Planning for Durham City 2019-2035, shows that these objectives can not be met by means of a Neighbourhood Plan. Whilst the Parish Council is absolutely right to pursue these objectives in collaboration with the local planning authority, a neighbourhood plan can not provide the necessary legislative policies nor the required resources to achieve the degree of change required.</p>	c5. Criticism that objectives are unachievable.	<p>All objectives have been tested by statutory bodies including the County Council, and it is with them and others that objectives will be pursued in partnership. The theme policies will contribute to the realisation of the objectives. National and local fiscal policies and charges, reallocation and redesign of highways, and societal changes will also be necessary to achieve the required degree of change.</p> <p>No change.</p>
<p>L15 /cont (i) The Neighbourhood Plan can only provide a mechanism for bringing about sustainable development, in so far as it can influence the use of land. In the case of the Draft Durham City Neighbourhood Plan, this relates to only a “handful” of small housing sites producing a few dozen new dwellings. It simply cannot, as a neighbourhood plan, feasibly deliver on the scope of its “Transport Objectives”.</p>	c5. Considers that only a handful of housing sites will be affected by the plan's policies.	Policy T1 applies to all types of development, including the many new buildings that are expected as part of Durham University's masterplan and the redevelopment of Aykley Heads. Policies T2 and T3 apply mainly to residential dwellings. Although only a few sites are identified in the plan for new dwellings, the policies will also apply to change of use, and it is quite possible that more commercial buildings will be converted to dwellings during the lifetime of the plan.
<p>L15 /cont (ii) 2. Evidence base to support the policies? No objective surveys have been commissioned or sought by the Neighbourhood Plan working group or its predecessor.</p>	c2. Criticism of lack of evidence base supporting the policies.	The Transport Theme draws on evidence from a number of sources, as detailed in the plan document. A major source is the Durham City Sustainable Transport Delivery Plan, including the

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		<p>issues and opportunities paper produced as background evidence.</p> <p>Of the transport issues identified in the priority survey, conducted by the Forum, walking and cycling required further exploration, and further engagement work was carried out which has become background evidence for Policy T1. It is set out in detail in the “Walking and cycling evidence paper” referred to in paragraph 4.229. This paper also includes a summary of relevant national and local policy.</p>
<p>L15 /cont (iii) Speculation as to what increase in “cycling take-up” might be achieved, is purely an individual’s aspirational conjecture.</p>	<p>c2. Considers that suggested increase in cycling rates is based on personal conjecture.</p>	<p>The “Walking and cycling evidence paper” includes analysis from the Department for Transport's recommended modelling tool to demonstrate the potential for increased cycling in Our Neighbourhood. The Durham City Sustainable Transport Delivery Plan also recognises the “significant potential to promote cycling for many journeys within the City” (p. 7).</p>
<p>L15 /cont (iv) There has been no attempt to measure the potential for motor transport to be substituted by bicycle.</p>	<p>c2. Considers that measurement of potential modal shift should have been carried out.</p>	<p>An exercise such as this is beyond the scope of a Neighbourhood Plan. Indeed, there has been no modelling of the potential for modal shift as part of the County Durham Plan preparations.</p>
<p>L15 /cont (v) Encouraging behavioural change from walking to cycling to the University, by several thousands of students (for half of the year), must</p>	<p>c2. Considers that increased cycling among students would cause increased traffic congestion and air</p>	<p>The policies are not specifically concerned with encouraging students to cycle. Cycling is just one of several</p>

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<p>be counter productive, as it would increase road congestion. Any significant increase of cycling in and around Durham's narrow roads must inevitably result in increased traffic congestion, and consequently increased air pollution. This has been ignored.</p>	<p>pollution.</p>	<p>sustainable modes of transport which the policies seek to enable and encourage among all sectors of the population as well as visitors to the city.</p> <p>While accepting that improved cycling facilities will probably lead to some shift from students walking to cycling, it is not accepted that this will inevitably result in increased congestion and pollution, for a number of reasons:</p> <ol style="list-style-type: none"> 1. Demand for travel is elastic. Drivers experiencing increased congestion may respond by using alternative routes, travelling at different times, using other modes of transport, or refraining from making the journey. 2. In order to provide safe cycle routes, separation from motor traffic and pedestrians is important. Where such routes can be provided, congestion for car drivers may instead reduce, because they will no longer need to interact with cyclists. The recently-approved route parallel to South Road is an example which will give increased capacity for all modes. 3. The limit on the carrying

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		<p>capacity of a city's road network is generally determined by the performance of the junctions, not the individual links. A queue of cars travelling slightly slower while waiting to overtake cyclists makes little difference to overall journey times.</p> <p>4. Although there has been widely-reported concern in London about the reduction in motor traffic lanes in order to accommodate segregated cycle lanes, the monitoring by Transport for London has shown that there has been an increase in throughput (the number of people using each road) and a reduction in air pollution locally, without any measurable increase in congestion or air pollution on neighbouring roads.</p>
<p>L15 /cont (vi) The over riding aim of the transport theme is to increase cycling (as a sustainable means of transport), and to oppose the private vehicle user. Numerous arguments that can be made against air polluting motor vehicles (and congestion). However, at the same time a balance between competing transport users needs to be struck. Motorised transport does have a vital and legitimate role to play for much of Durham City's transport needs. Highways exist and are maintained for vehicle transport.</p>	<p>c2. Concern that the transport theme promotes cycling to the detriment of the private (motor) vehicle user.</p>	<p>The transport theme does not promote cycling as an overriding aim. The policies are founded on the user hierarchy of the <i>Manual for Streets</i> as adopted by the County Council in the <i>Durham City Sustainable Transport Delivery Plan</i>, and therefore prioritise walking over cycling.</p> <p>It is accepted that a balance between competing transport users needs to be struck, however it is widely recognised</p>

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		<p>in the transport planning profession that the balance for the last sixty years or more has been overly focussed on enabling private car travel, and has created car dependency. The policies set out the criteria for decision-making, in conformity with local and national policy, but the judgement as to the correct balance will be for the planning authority to determine.</p> <p>Highways do not exist solely for vehicle transport. Highway users also include pedestrians and equestrians. Bicycles are considered in law to be vehicles.</p>
<p>L15 /cont (vii) 3. Other Options ? Perhaps this could be explored by the Parish Council's Environment Committee in consultation with Durham County Council as the Local Highways Authority. The draft neighbourhood plan is prejudiced and unbalanced towards cycling.</p>	<p>c2. Considers Neighbourhood Plan is biased towards cycling.</p>	<p>It is very hard to see how policy wording could be amended to favour cycling less without the policies coming into conflict with national policy including NPPF. The respondent makes no suggestions for changes to wording.</p>
<p>L15 /cont (viii) 4. Prejudiced Pedestrians should not be put at a disadvantage, nor should the "quality of life" for walkers when using footpaths through green spaces, be compromised in order to serve that small minority of cyclists who are not prepared to dismount when occasionally travelling on footpaths. The draft neighbourhood plan is prejudiced and unbalanced towards cycling at the expense of pedestrians: see page 3, 1.3 -reference to companion document "Looking Forwards": also page 177, Map 10: Cycling Issues</p>	<p>c2. Against cycle routes that would cause detriment to pedestrians.</p> <p>c1c. Creation of cycle routes is the responsibility of the County Council as highways authority.</p> <p>c4. See Initiative 16: Walking and Cycling Durham in 'Looking Forwards'.</p>	<p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights localised issues that might need to be addressed when considering development proposals.</p> <p>Promotion of sustainable transport, including cycling, is national and county policy. Maps 9 and 10 (pedestrian and</p>

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		<p>cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.</p> <p>There are four pedestrian-only footpaths on Map 10, which have been marked as routes where cycling is restricted. One further footpath has been marked as “needs improvement” because although the landowner appears to permit cycling, the route is not of adequate width. Any other footpaths included on the map have been designated as shared use by the County Council. Some of these have been marked as needing improvement and have also been included on Map 9: Pedestrian Issues because of poor design or the need for segregation.</p> <p>There are two pedestrianised streets which have been included on Map 10, but as these streets are open to delivery vehicles outside peak shopping hours, there may be scope to allow cycling with appropriate time restrictions. The inclusion of restricted routes on Map 10 ensures that developers are aware that these routes are not generally available for cycling, in order to forestall the submission of</p>

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<p>L15 /cont (ix) Within the context of a neighbourhood plan, I have persistently suggested that:</p> <ul style="list-style-type: none"> i) arguments should be reasoned and balanced, ii) evidence should be robust and credible, proportionate and objective, iii) any consequent proposals should be realistic, meaningfully relevant and enjoy a wide measure of community support. 	c2. Statement of principles.	<p>overly positive transport assessments.</p> <p>The Parish Council's Neighbourhood Plan Working Group has always sought to uphold these standards.</p>
<p>L15 /cont (x) However, as I have consistently failed to persuade other members of the Neighbourhood Planning Working Group on these points, there is little to be served by me repeating my reasoning to the Working Group. I therefore merely make the point here that I consider that the “draft Transport Theme ” is likely to be judged Unsound and puts the final adoption the the plan at unreasonable risk.</p>	c2. Suggests that the transport theme will be found unsound, and the rest of the plan will be put in jeopardy.	If elements are unsound, the Inspector will have the opportunity to propose amendments during the examination process. Note that the County Council's response does not suggest that the transport policies are unsound, and nor did the AECOM Sustainability Assessment.
<p>L15 /cont (xi) The modus operandi adopted first by the Forum and subsequently continued by the current working group, relies far too heavily upon a single individual, acting unilaterally as a “theme champion/coordinator”.</p>	c2. Criticism of arrangements for formulating policies.	At all the significant stages in policy formation, all members of the working group (and previously the Forum) were encouraged to contribute, and this resulted in many refinements to the plan.
<p>L15 /cont (xii) There has been inadequate group collaboration and virtually zero meaningful community participation.</p>	c2. Criticism of arrangements for formulating policies.	At the stage of original drafting of the transport theme policies up to about June 2016, four members of the Forum were involved in a series of meetings and drafts. Other themes were also tackled by a minimum of two working group members before being put before the group for further discussion. At various stages the theme co-ordinator has had valuable assistance from other members of the group.

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		For further detail on the process, including community participation, see the Consultation Statement.
<p>L15 /cont (xiii) I consider it unrepresentative of the “neighbourhood”, that the same small group of acquaintances should exercise dominance and control over the plan making process for the last six years.</p>	c2. Criticism of control of the plan making process.	New members have joined the Forum and the working group at various stages of the development of the plan, and the full Forum was involved regularly in the decision-making and in signing off policies. From the start of 2018, weekly Forum meetings were held prior to each working group meeting, and all Forum members were welcome to participate in the practical work of developing the plan. No-one has ever been excluded from participation.
<p>L15 /cont (xiv) I consider the draft Transport Theme to fail on each of the above points i), ii) and iii). A number of significant comments previously submitted in response to the 2017 Draft Durham City Neighbourhood Plan have not been addressed.</p>	c2. Significant comments from previous consultation have not been addressed.	The respondent does not identify which comments are being referred to. The revision process sought to address comments wherever this was uncontentious. In cases where there were comments which conflicted with local or national policy, or with other comments, it was not possible to make all the changes that people desired.
<p>L15 /cont (xv) I hope that the Parish Council will examine this with fresh eyes and review the working group’s terms of reference (or lack of), before examination by the independent examiner, via the Local Planning Authority.</p>	c2. Request for a review of the working group’s terms of reference.	The respondent needs to make this proposal direct to the Parish Council.
<p>L15 /cont (xvii) Objective examination and evaluation of the “evidence basis” as provided in the Draft Plan in support of the Transport Theme policies,</p>	c2. Reiteration of criticisms of the evidence base and consultation process.	Appendix D of the plan and the background “Walking and cycling evidence paper” include locally relevant

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<p>clearly reveals a scarcity of community engagement, a lack of properly considered public consultation and an absence of locally relevant empirical data. All of these shortfalls are compounded by the “Transport Theme’s” almost obsessive focus upon promoting an already “pre-planned and mapped out Durham City cycle network” that is currently being campaigned for by various cycling groups:</p> <p>1. “TRUSTPATHWAYS” (www.trustpathways.com): organisers Matthew Phillips, M Wright see below Trust Pathways map titled “Mind the gap!”, intended to: “Plan a full network of cycle-friendly routes....” across Durham City.</p> <p>1. Durham University’s DBUG (Durham Bicycle Users Group): See “Pre-Submission Draft of the (former) County Durham Plan – Consultation response by DBUG” submitted “ c/o Mathew Phillips</p> <p>1. Durham City Cycling Forum See notes of meeting 29.01.2013 Item 6. Strategic Cycling Routes Durham University reps. Mathew Phillips, Mathew Wright Mind the gap! (updated) 11 April 2017 Trust Pathways Uncategorized 2 (www.trustpathways.com);</p>	<p>c2. Objection to promotion of a pre-planned cycle network.</p>	<p>empirical data which is considered to be proportionate to the requirements for neighbourhood plans.</p> <p>As well as community engagement events in 2015 and specific work on transport issues in 2016, the transport theme has been redrafted following the 2017 consultation.</p> <p>The Neighbourhood Plan contains no policy to create specific cycle routes, but Policy T1 does require that cycle routes be considered as part of new developments and to mitigate impacts on existing networks. It also highlights localised issues that might need to be addressed when considering development proposals.</p> <p>Promotion of sustainable transport, including cycling, is national and county policy. Maps 9 and 10 (pedestrian and cycling issues) in Appendix D are a picture of the current context from comments received. They do not prescribe provision of particular facilities, as this would be beyond the scope of a neighbourhood plan.</p> <p>The transport theme co-ordinator, Matthew Phillips, is involved in campaigning for improved cycle facilities in Durham, and this has</p>

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		<p>always been well understood. He also walks, uses buses, and has driven and been driven in Durham.</p> <p>The Durham City Cycle Forum is not a campaign group. It is a focus group called very occasionally by the County Council, and Matthew Phillips attended this as a private individual and not as a representative of the university. The meeting referred to was discussing routes that might be allocated in the County Durham Plan, and this work was drawn on to inform Map 10, as is plain from the “Walking and cycling evidence paper”.</p> <p>Matthew Phillips is a member of Durham University's bicycle user group, DBUG. That group submitted an objection to the County Plan which included evidence regarding key cycle routes that had not been identified in the plan's allocations.</p> <p>The Trust Pathways group was set up in 2016, as a more appropriate forum for discussion and campaigning, not limited to university staff and students.</p>
<p>L15 /cont (xviii) [map included in response] This picture is from a new diagram of cycling routes in and around Durham city. It is not meant to be a map to help you find your way. Instead it highlights the gaps in the network, by colour-coding all the</p>	<p>c2. Mention of another map of cycle routes.</p>	<p>The map referred to (the “tube map”) was produced about a year after the first version of Map 10: the map in the Neighbourhood Plan is original and not based on a “pre-planned network”. For</p>

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<p>links according to their safety. Blue links are the safest, red the most dangerous, and some useful missing links are shown as grey dashed lines. The most dangerous junctions are colour-coded too, with a red circle inside the black.</p>		<p>the detail of how Map 10 was produced, see the “Walking and cycling evidence paper”.</p> <p>The maps understandably have some similarities, because they highlight current conditions for cycling. Neither the “tube map” nor Map 10 propose specific routes. Instead they give assessments of the quality of provision along all the links that people are likely to want to use in order to make everyday journeys around Durham.</p>