

Comments

County Durham Plan Preferred Options (22/06/18 to 03/08/18)

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	204
Response Date	28/07/18 11:07
Consultation Point	Question 1 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum supports the preferred Vision.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	205
Response Date	28/07/18 11:10
Consultation Point	Question 2 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum supports the preferred Objectives and suggests that there should be an extra objective to provide for the needs of older people and those with mobility difficulties.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	206
Response Date	28/07/18 11:12

Consultation Point Question 3 ([View](#))
Status Submitted
Submission Type Web
Version 0.1
Comments

The City of Durham Neighbourhood Planning Forum supports the preferred Sustainable Development Statement.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID 207
Response Date 28/07/18 11:13
Consultation Point Question 4 ([View](#))
Status Submitted
Submission Type Web
Version 0.1
Comments

The City of Durham Neighbourhood Planning Forum supports the preferred General Development Principles, with which our Policy S1 is fully consistent.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID 208
Response Date 28/07/18 11:17
Consultation Point Question 6 ([View](#))
Status Submitted
Submission Type Web
Version 0.1
Comments

The City of Durham Neighbourhood Planning Forum commends the County Council's adoption of the standardised national method for calculating housing need and use of the most up-to-date Sub-National Household Projections, which at the time of writing are the 2014 ones. However, we note that the 2016 projections are due to be published in September, and consequently these would be the ones to be used in subsequent stages of the Plan. The 2016 population projections were published in May, and these show a further reduction in the projected County population in 2035 from 560,200 (2014) to 546,900 (2016). Subject to the precise assumptions on projected household sizes, we would expect

the Sub-National Household Projections in September to reduce the County Durham Objectively Assessed Housing Need and therefore the estimated need in Durham City.

The Forum appreciates that the standardised national methodology only provides a gross figure of the number of residential units required to accommodate the projected number of households in the County as a whole. Whilst this figure is described as housing need, the Forum points out that in reality the provision that is needed should be determined by the particular requirements of each community rather than a top-down County target for house-builders to achieve.

The Forum notes Paragraph 4.23 and suggests that a positive policy to encourage the conversion of student HMOs back into family homes would mean some allowance could be made here towards meeting housing need figures.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	209
Response Date	28/07/18 11:18
Consultation Point	Question 7 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum supports Policy 3 but will also in the Neighbourhood Plan support employment sites at Mountjoy, Blagdon Depot, Providence Row and Fowlers' Yard.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	210
Response Date	28/07/18 11:23
Consultation Point	Question 8 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum supports the proposed range of ancillary uses, with which our Policy E1 is consistent. The Forum also supports the strong green infrastructure and new public park proposed in Policy 4, and welcomes the absence of previous development proposals in the Green Belt plateau area of Aykley Heads. The Forum considers that provision should be made not only for 'footloose' employment projects but also for 'home-grown' new and expanding businesses.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
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Comment ID	211
Response Date	28/07/18 11:27
Consultation Point	Question 10 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	H4
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Please provide your comments here.

The City of Durham Neighbourhood Planning Forum notes that the only proposed allocation within the Neighbourhood Plan areas is Site H4 - Former Skid Pan, Aykley Heads. The Forum does not support this proposal because the site is in the Green Belt and it is considered that open recreational uses should be proposed instead

Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	None selected
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Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	None selected
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Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	None selected
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Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	None selected
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Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	None selected
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Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.	None selected
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Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
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Comment ID	212
Response Date	28/07/18 11:28
Consultation Point	Question 11 (View)

Status Submitted
Submission Type Web
Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum proposes as an additional site the former wood yard at the top of John Street, which is site reference D1.2 in the Draft Durham City Neighbourhood Plan and has space for 22 houses and would be very suitable for elderly persons' accommodation because of its location near North Road's shops and bus and train stations. The Forum notes that the site is now the subject of a planning application for 27 C3 units, with what appears to be very limited social/living space, and asks the County Council to ensure that this does not become a PBSA; indeed, conditions to that effect and also restricting it to persons over 55 years of age should be imposed.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID 215
Response Date 28/07/18 11:32
Consultation Point Question 12 ([View](#))
Status Submitted
Submission Type Web
Version 0.1

Comments

Whilst the proposed urban extension at Sniperley for 1,900 new dwellings is not within the Neighbourhood Plan area, it is immediately adjacent and will generate significant additional vehicular traffic flows within the Parish area and thereby have a major adverse impact. The Forum is unconvinced that traffic data demonstrates how the proposed infrastructure works would deal satisfactorily with the impact of Sniperley upon our Neighbourhood.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID 216
Response Date 28/07/18 11:33
Consultation Point Question 13 ([View](#))
Status Submitted
Submission Type Web
Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum supports Policy 7.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	217
Response Date	28/07/18 11:43
Consultation Point	Question 15 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum is pleased to see this policy for supporting the contribution Durham city makes to vitally important tourism economy of County Durham.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	218
Response Date	28/07/18 11:45
Consultation Point	Question 16 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum notes that the retail hierarchy identified in Preferred Options classes Durham city centre as a sub-regional centre. The Forum agrees that this is its role and supports the requirement in Policy 10 for impact assessments where out-of-town retail development is proposed. The floorspace size thresholds set for triggering an impact statement of out-of-centre retail developments should be re-considered with a view to lower figures in the light of the closures in Durham city centre.

The Forum further notes in Paragraph 5.33 that the redevelopment of the Gates shopping centre and the development of the site of the former Government offices in Milburngate House are the main points mentioned. Most of the units in both schemes are not shops and, at the same time, the city centre has several empty shops in its main retailing frontages of Silver Street. A more active, focussed and imaginative strategy is required for Durham city centre.

The Forum notes that Paragraph 5.57 recognises the value of allowing residential use of upper floors but rules this out in Primary Retail Frontages. We suggest that more flexibility should be allowed provided that upper floor residential uses would not have an adverse impact on retail, commercial and tourism activities and the general amenity of neighbouring properties.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
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Comment ID	219
Response Date	28/07/18 11:48
Consultation Point	Question 22 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comments

Provision of affordable housing, meeting the needs of older people, and specialist housing are key issues. Policy 16 addresses the question of affordable housing by setting percentage requirements for affordable housing depending upon whether the development is in a highest, high, medium or low value area. For the Durham City Neighbourhood Plan area the requirement on a housing development scheme would be 20% to 25% to be affordable dwellings. The Forum wishes higher percentages but accepts the analysis and evidence used by the County Council. If development schemes within the Parish Council area are permitted to provide affordable housing off-site, the Forum asks that the location of such off-site provision should be within Durham City.

There is a particular issue in Durham City, namely the question of affordability in relation to Colleges and PBSAs; consideration should be given to a 20% to 25% affordability requirement being applied.

However, about 87% of the extra households in County Durham between 2018 and 2035 are aged 75 years and over. Durham City has a higher proportion of elderly households in its long-term (i.e. non-student) population than the County Durham average, so this is a particularly important issue to the Forum. Preferred Options requires only 10% of the 6,295 proposed new dwellings in County Durham, i.e. about 630, should be provided for the elderly. This is woefully inadequate. The Forum therefore urges that the percentage should very much higher. The Forum also urges that land owned on behalf of the public by the County Council is used with appropriate social and market housing providers to develop affordable housing for the elderly. There is such land within and just beyond the Neighbourhood Plan area.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	220
Response Date	28/07/18 12:13
Consultation Point	Question 23 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comments

The City of Durham Neighbourhood Planning Forum considers that Policy 17.1 on Durham University development is a significant and welcome new policy with many of the safeguards and criteria that the Neighbourhood Planning Forum has been considering. However, the Forum notes that Preferred Options portrays Durham University as a wholly beneficial presence in the city. There is much that the University brings to the city, and the Forum welcomes the positive aspects but must also speak about the negative aspects. Paragraph 5.10 of Preferred Options takes an uncritical, indeed benign, view of

the University's growth Masterplan. In particular, the apparent acceptance of an increase by 6,000 in the number of University students in Durham city is a passive conclusion that the city can cope. The Forum considers that, on present evidence, the city cannot cope - the term-time daily struggle with over-crowded pavements; cars parked all over grass verges; and whole areas blighted by rowdy parties, rubbish and rats. **The Forum insists that there should be a full assessment of the economic, environmental and social impacts of the proposed scale, pace and locations of the Masterplan's proposals.** Further, the full Masterplan (not just the 'glossy' summary) should be published as part of the evidence base for *Preferred Options*.

With regard to proposals for Purpose Built Student Accommodation, the Forum considers that Policy 17.2 takes the Interim Policy of the County Council a worthwhile step further in the light of experience. In particular, allocating specific sites for PBSAs on the University's own estate is exactly the approach that has long been sought, though we have a particular concern about the consequences of the loss of the Elvet Hill car park.

Proposals for PBSAs other than on those sites will not be permitted under Policy 17.2 unless certain criteria are met. These criteria are brought across from the Interim Policy, and the Forum considers that a further test is necessary. Other than on the University's own estate, PBSAs have had a dominating and disruptive impact upon existing residential areas and communities. The Forum therefore proposes, in line with the approach for HMOs, that in order to promote, create and maintain sustainable, inclusive and mixed communities, any development proposal for new, extensions to, or conversions to, Purpose Built Student Accommodation other than on the six allocated sites will not be permitted if more than 10% of the total number of residential units within 100 metres of the application site are already in use as HMOs or student accommodation exempt from council tax charges. There are other wording differences to be considered though ongoing discussions.

With regard to Houses in Multiple Occupation, the City of Durham Neighbourhood Planning Forum considers that Policy 17.3 is also a worthwhile improvement on the Interim Policy. Again, the Forum proposes a slight further improvement in order to make sure that the impact not just of HMOs but also of PBSAs in the vicinity is taken into account. The policy counts properties within 100 metres of the application site. A PBSA is a single property but can house several hundred students, with the same consequential impacts on the balance of the community as so many students in HMOs would represent. The Forum therefore proposes that Policy 17.3 should count the number of residential units within the PBSA. For example, the PBSA development at the County Hospital amounted to just 3 distinct properties but contains 82 student studios and 281 student flats. Thus, the Forum proposes that part (a) of Policy 17.3 should be slightly modified to replace the word 'properties' with the words 'residential units'. Again, there are other wording differences to be considered though ongoing discussions.

The Forum does not support the 'exemption' clause to not resist a new HMO where a high proportion of existing properties within the 100 metres radius are already HMOs. The application of this part of the Interim Policy has proved to be perceived as arbitrary. Individual exemptions are best dealt with on the basis of particular hardship circumstances.

The Forum believes that the County Council and the University together need to form and fund a partnership vehicle to return sets of houses in multiple occupation back to homes for long-term (i.e. non-student) residents.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	221
Response Date	28/07/18 12:14
Consultation Point	Question 24 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comments

The City of Durham Neighbourhood Planning Forum supports the preferred site allocations for PBSAs.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	222
Response Date	28/07/18 12:20
Consultation Point	Question 25 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comments

The City of Durham Neighbourhood Planning Forum suggests the University's proposals for a PBSA at Green Lane should be allocated. (Note: we may not propose this if AECOM have not given it a positive assessment).

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	223
Response Date	28/07/18 12:21
Consultation Point	Question 28 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comments

The City of Durham Neighbourhood Planning Forum supports this policy, with which our Policies D4 and D5 are compliant.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	224
Response Date	28/07/18 12:23
Consultation Point	Question 29 (View)
Status	Submitted

Submission Type Web

Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum strongly supports this policy, with which our Policy G4 is compliant. The Green Belt is a key strategic planning tool for steering new development into suitable villages.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)

Comment ID 225

Response Date 28/07/18 12:24

Consultation Point Question 30 ([View](#))

Status Submitted

Submission Type Web

Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum accepts that it is the role of the Local Plan to propose amendments to Green Belt boundaries where anomalies have arisen since the original designation. However the two proposed amendments within the Neighbourhood Plan area are arbitrary and unconvincing.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)

Comment ID 226

Response Date 28/07/18 12:25

Consultation Point Question 31 ([View](#))

Status Submitted

Submission Type Web

Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum's comments are expressed in answer to Question 32.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)

Comment ID 227

Response Date	28/07/18 12:28
Consultation Point	Question 32 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum's response to Policy 24 will be accompanied by a response to the concurrent consultation on the Durham City Sustainable Transport Delivery Plan.

The Forum considers that the Durham City Sustainable Transport Delivery Plan is a highly significant forward step in managing the pressures in this fragile city not just in its physical fabric and heritage qualities but also air pollution, quality of life and the vitally important tourism sector of the economy. The Forum is fully supportive of aims for better provision for pedestrians, for cyclists, and for public transport users which will enable and encourage greater use of sustainable transport modes. These should be introduced in the soonest possible time-frame.

The Forum is concerned that Preferred Options and the accompanying Sustainable Transport Delivery Plan suggest that the building of a Northern Relief Road is a prerequisite for dealing with peak-time congestion and severance issues in the city centre. Sustainable transport measures must not be postponed on the grounds of delays to the relief roads. Moreover, it is crucial to get the staging of transport improvements correct. The Delivery Plan places provision for motor vehicles bottom of the ranking of priorities, whereas Preferred Options proposes major investment in new roads. This attempt to increase motor vehicle capacity undermines the case for the interventions which are necessary to enable and promote sustainable modes. The Forum does not see that the relief road projects can be reconciled with the statement in Policy 23 that "all development shall deliver sustainable transport by (a) delivering, accommodating and facilitating investment in sustainable modes of transport in the following order of priority: walking, cycling, bus and rail transport, car sharing and alternative fuel vehicles".

The Forum is surprised that there is no proposal for a further Park-and-Ride facility and believes that this should be remedied in the County Plan, to the west or southwest of the Neighbourhood Plan area, as this would greatly assist reducing the destructive pressures and congestion caused by vehicular traffic attempting to enter the city centre and to park.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	252
Response Date	29/07/18 14:53
Consultation Point	Question 14 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum is pleased to see this policy for supporting the contribution Durham city makes to vitally important tourism economy of County Durham. The Neighbourhood Plan document will have a complementary project for a Community Hub facility.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	253
Response Date	29/07/18 14:55
Consultation Point	Question 34 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum supports the principles set out in Policy 26 and considers that our Policies T1 and T2 are appropriate finer detail.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	254
Response Date	29/07/18 14:56
Consultation Point	Question 36 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum welcomes this policy and notes that our Policy G1 provides appropriate local detail.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	255
Response Date	29/07/18 14:58
Consultation Point	Question 39 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The City of Durham Neighbourhood Planning Forum considers that this policy, whilst welcome, does not set design to the highest standards. The optional space standards should be moved into policy as required space standards.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	256
Response Date	29/07/18 14:59
Consultation Point	Question 41 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

This is an important policy which the Forum supports, especially given the serious air pollution problems in the Neighbourhood Plan area.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	257
Response Date	29/07/18 15:00
Consultation Point	Question 43 (View)
Status	Submitted
Submission Type	Web
Version	0.1
Comments	

The Forum is generally in agreement with this policy but would not support fields of solar photovoltaic generators and is wary of solar photovoltaic generators on visible roofs in the Conservation Areas.

Comment by	Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID	258
Response Date	29/07/18 15:02
Consultation Point	Question 49 (View)
Status	Submitted
Submission Type	Web

Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum welcomes this policy and notes that our Policy G1 is compliant.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)

Comment ID 259

Response Date 29/07/18 15:03

Consultation Point Question 50 ([View](#))

Status Submitted

Submission Type Web

Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum welcomes this policy and notes that our Policies S1 and D6 are compliant.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)

Comment ID 260

Response Date 29/07/18 15:04

Consultation Point Question 52 ([View](#))

Status Submitted

Submission Type Web

Version 0.1

Comments

The City of Durham Neighbourhood Planning Forum welcomes this policy and notes that our Policy G1 is compliant.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)

Comment ID 261

Response Date 29/07/18 15:05

Consultation Point Question 53 ([View](#))

Status Submitted
Submission Type Web
Version 0.1
Comments

The City of Durham Neighbourhood Planning Forum considers that Policy 46 is very important for Durham City and welcomes the positive measures it sets out to protect, conserve and support beneficial uses for the historic environment. Our Policies H2, H5 and H6 are complementary to Policy 46.

Comment by Durham City Neighbourhood Forum (John Lowe - 1013382)
Comment ID 262
Response Date 29/07/18 15:06
Consultation Point Question 54 ([View](#))
Status Submitted
Submission Type Web
Version 0.1
Comments

The City of Durham Neighbourhood Planning Forum places Durham Cathedral and Castle World Heritage Site at the forefront after sustainability of our draft Neighbourhood Plan. Preferred Options Policy 47 is generic to all World Heritage Sites whereas our Policy H1 is shaped by the particular qualities and setting of Durham Cathedral and Castle World Heritage Site. The Forum suggests that Policy 47 should be made more specific to this particular World Heritage Site, using the approach commended by Historic England and the Draft Neighbourhood Plan.