

Policy	LPA Comment	Suggested Action
Theme 1 General	Theme 1	
	<p>Flood Risk – pg26-27. It should be noted that the referencing within section 8 to the SFRA is not particularly clear as the AECOM report supersedes the Golder report. Section 9 the text refers to the introduction of higher standards, but it is unclear where these originate from. Where sites are allocated in the neighbourhood plan and it states that the site should be subject to a flood risk sequential test this should have been carried out before they were allocated. It is unclear as to whether this has been done.</p>	
S1	<p>The first sentence of the policy would benefit from being simplified.</p> <p>As written criteria d & e require proposals to both conserve and enhance which is too high a test.</p> <p>Criterion h is above Building Regulation requirements. As such, justification is required in the supporting text. Viability constraints need to be factored in to this requirement.</p> <p>Criterion j does not accurately reflect current flood risk guidance which distinguishes between flood zones 2 & 3.</p> <p>In Criterion k the reference to public art needs to be more specific in delivery terms i.e. should it be on site or a commuted sum and viability needs to be factored in.</p> <p>Some of the sites the neighbourhood plan lists as allocations do not fit with the criteria of this policy. It is not clear what this policy adds over and above the sustainable design policy in the emerging CDP. Different ways of saying the same thing could cause</p>	<p><i>Amend to ‘All development proposals must, where relevant demonstrate the following principles’</i></p> <p>Amend text to make it clear that requirement to ‘conserve’ and ‘protect’ are the minimum required to accord with the policy criteria.</p> <p>Provide justification in supporting text.</p> <p>Amend wording of criteria j to better reflect current guidance on this matter.</p> <p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

	confusion in the application of this policy.	
Para 3 figure 1	This is currently being reviewed and the is text will therefore quickly become out of date.	Check accuracy of text before publication of next version of DCNP.
S2	<p>From a procedural perspective any such masterplan or absence of a one would not amount to be a material planning consideration.</p> <p>It is unclear as to when this policy would be relevant in the absence of a definition for 'large'. This will hinder implementation of the policy.</p> <p>Is the reader to interpret that every 'large site' would trigger one of those by default or that a 'large site' could come forward without a masterplan if it didn't trigger one of those criteria? As worded, if there is no issue around the disposition of buildings or traffic <u>within</u> the site a <u>major</u> impact on the adjacent areas or there would be intrusive in views of the WHS then a masterplan would not be required.</p> <p>The policy does not include any means to assess the masterplan.</p> <p>In the interests of clarity, the issues triggering the policy would benefit from being shown in a bulleted list.</p> <p>The final 2 sentences are not written as policy and relate to procedural matters.</p> <p>It is also not clear from the policy/supporting text how the developers will be required to 'submit the masterplan and any subsequent changes to public scrutiny'.</p>	<p>Reconsider this as supporting text.</p> <p>Provide a definition of large within the policy.</p> <p>Relevant policy criteria should be included.</p> <p>Amend layout.</p> <p>Move text into the justification.</p> <p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

Theme 2		
Theme 2 General	<p>Objective 1: This sets out a higher bar than NPPF as it requires both actions. There may be instances where a neutral impact would be acceptable.</p> <p>Objectives 1 & 4: The council would encourage the use of <i>'sustain'</i> rather than conserve so that the neighbourhood plan is consistent with the language used in the current heritage local and national policy context.</p> <p>The supporting text is too wordy and not particularly user friendly as some key messages are lost in the volume of text.</p>	<p>Amend objective to better reflect NPPF by inserting <i>'wherever possible'</i></p> <p>Revise wording accordingly throughout section where this arises.</p> <p>Edit the supporting text and use links where possible.</p>
H1	<p>This policy misses out on opportunities to expand on detail not provided in the emerging CDP to further explain what is appropriate for this area. It therefore does not move this strategic matter on and its purpose is merely to repeat a strategic matter dealt with in the CDP. The Seaham Conservation Management Plan has a level of detail that the NP could have drilled down to and added value to.</p> <p>If a policy covering this matter is to be progressed, then the following issues should be addressed:</p> <p>The title would benefit from being more positively worded so that it is in line with current national heritage thinking e.g. incorporating sustain and enhance.</p> <p>The policy uses different wording to the emerging CDP which may result in confusion/ debate at appeal.</p> <p>Language is not sufficiently definitive for example the use of <i>'must be shown to'</i></p> <p>Criterion a: Lacks detail on how and where would you do this? This</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

is not worded as a criterion to determine a planning application.

Criterion b: Concern that 'harmonise' is too subjective a term.

Criterion c: This is ruling out contemporary materials – role of NP should be to pick up a palette of traditional and contemporary materials as appropriate.

Criterion d: As written a scheme which is not decorative would be in conflict. This is not the intention of the policy. The term decorative schemes need defining (e.g. earth/ muted tones) without being too prescriptive.

Criterion e: It is not clear what 'seeking balance' means. Overbearing would come from outside i.e. setting, not within. It is not clear whether it is about scale and massing or one or the other?

Criterion f: Seems to repeat e – there is confusion between scale and massing. Could have a criterion for scale and one for massing. (scale is size, massing is composition of size i.e. whether it is broken up/ gaps in between)

The policy needs to be rewritten to acknowledge that there will be instances where text between f & g is not relevant to a proposal.

The term 'development' is too broad, there will be some instances where this will not be relevant in practice.

Not all of the neighbourhood plan area will relate to the setting of the WHS. The county council therefore has concerns about how the latter part of the policy (g-h) will work over an area that is not appropriate and that relates to all development regardless of type and scale. Some proposals will have no inter-visibility with the WHS.

	<p>The policy needs to cross reference to map 2 if that is what it is referring to in the interests of clarity.</p> <p>Criterion i: To be effective and clear the county council considers that this criterion should refer to either <i>'key views, positive views and/ or appropriate views'</i> otherwise as worded it could result in unintended consequences such as the opening up of a view which may remove an important sense of enclosure or open up unwanted views.</p>	
<p>H2</p>	<p>This policy misses out on opportunities to expand on the level of detail provided in the emerging County Durham Plan and further define what is appropriate for this area in terms of important matters such as design, (including shop front and signage design), massing and scale, materials (traditional/non-traditional) including public realm. It therefore does not move this strategic matter on and its purpose merely repeats a strategic matter dealt with in the CDP. The Seaham Conservation Management Plan has level of detail that the NP could have drilled down to and added value to the collective development plan.</p> <p>If a policy covering this matter is to be progressed, then the following issues should be addressed:</p> <p>Reference is made to <i>'heritage values'</i> of the Conservation Area Appraisals and this policy relies upon them. These appraisals do not contain <i>'heritage values'</i>. There is however a summary of <i>'special interest'</i> in each – It is unclear as to whether this what the policy is referring to or whether they are a different set of matters.</p> <p>Wording in the second paragraph is should be made clearer.</p> <p>The policy does not define what is acceptable and what is not acceptable within a Durham City context over and above what the</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy. The Seaham Conservation Management Plan has level of detail that the NP could have drilled down to and added value to the collective development plan.</p> <p>Amend policy wording so that proposals are to be informed by <i>'special interests'</i> of the Conservation Area.</p> <p>Rephrase paragraph.</p>

	<p>CDP provides for.</p> <p>Criterion a: <i>'Respect'</i> is not in primary legislation – provides inconsistency/ conflict in argument.</p> <p>Criteria a, b & g: go beyond NPPF tests - they assume that the harm will be substantial or represent a total loss of a designated heritage asset in all instances. This would not always be the case. Furthermore, there is no duty to 'enhance' within national policy.</p> <p>Criterion i: Conflicts with WHS. Why mention both types of design - should be saying design should respond to its context</p> <p>Criterion k: The term <i>'Appropriate'</i> needs to be defined. Though it is not appropriate in all instances and not really a conservation area issue.</p> <p>Criterion j: The issue of scale and massing is repeated unnecessarily.</p> <p>Criteria m & n: The policy is worded in a manner which promotes mixed uses and new buildings in registered parkland. This would conflict with the emerging County Durham Plan and is not appropriate, only conversions may be appropriate and there are no opportunities for this in the foreseeable future.</p>	<p>Amend wording to better reflect NPPF including omission of <i>'substantial'</i> from policy test.</p> <p>Amend section on Burn Hall to reflect the county councils concerns and focus the policy on managing matters relevant to extensions and alterations.</p>
<p>H3</p>	<p>This policy is not a heritage related policy, so it would be better located in the first section. It would also would benefit from being simplified so that it is clear that it is relevant to development beyond the Conservation Areas.</p> <p>Criterion b: This is at odds with how the local planning authority</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy. The Seaham Conservation Management Plan has level of detail that the NP could have drilled down to and added value to the collective development plan.</p>

	<p>would determine loss of a public open space. This criterion also introduces a higher test than NPPF.</p> <p>Criteria c & d: as written are general design policies which are covered elsewhere within the neighbourhood and local plans and therefore result in unnecessary repetition.</p>	
<p>H4</p>	<p>Policy needs to be clear what assets it is covering and why it is necessary over and above other policies for them. It is not clear whether it is to be applied to buildings only – though H2 seeks to cover that?</p> <p>The policy fails to reference impact upon ‘significance’ of a heritage asset (where it affects form of fabric of building).</p> <p>The county council is concerned that the implication of this policy as currently worded is that where a property is ‘at risk’ any use would be accepted, which cannot be right as the degree of appropriateness also needs to be factored into the consideration through this policy. It will therefore conflict with other land use policies within the neighbourhood and local development plans.</p> <p>In the archaeology section of the policy a higher a barr test than that set out in NPPF is included which relates to SAMS or sites equivalent to a SAM. In addition, the policy does not reflect the fact that if the test set out in NPPF is met then development may be possible.</p> <p>The last paragraph of this policy introducing an unevidenced new test which again is set higher than NPPF which has no test for non-designated heritage assets.</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy. The Seaham Conservation Management Plan has level of detail that the NP could have drilled down to and added value to the collective development plan.</p> <p>Clarification and consideration of interplay between policies is required.</p>
<p>Theme 3</p>		

<p>Theme 3 General</p>	<p>Paragraph 4.77-4.78 talks about the 2012 GI strategy and 2018 GI framework. The latest NPPF has superseded the 2012 document but that is not clear from the way this text has been written.</p> <p>G2.6 pg. 60-61 – references Areas of High Landscape Value. This will need to be revised to reflect the Areas of Higher Landscape Value in the emerging CDP. It is highlighted within the text that there are a number of designations covering the woodlands, so it is questioned why another designation is required.</p>	<p>Update text to reflect current NPPF.</p>
<p>G1</p>	<p>This policy is quite prescriptive and may lead to the sterilisation of some sites.</p> <p>This policy is very long and although it has been split up into sections it is quite difficult to interpret. It would benefit from being split into new provision requirements, safeguarding and enhancing existing provision and exceptions to both of these.</p> <p>The cross referencing to the definition of green assets could be clearer.</p> <p>The policy title and sub headings do not reflect the fact that this policy also seeks to create new assets.</p> <p>Protecting and enhancing green infrastructure: It is not clear why a 0.4 ha threshold is appropriate for non-residential developments. Furthermore, the opening sentence refers to 0.4 ha twice unnecessarily. It is not clear whether this threshold relates to the whole of the policy or just this section of it. Whilst it relates to all types of development regarding a & b there are differing requirements later which is confusing.</p> <p>Paragraph above ‘protecting footpaths’ - as worded would currently result in an overlap if the site was exactly 0.4ha or 10 dwellings.</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p> <p>Consider inserting referencing in a full sentence within the policy.</p> <p>Amend title and subheadings where applicable.</p> <p>Refine text and add justification of thresholds within supporting text.</p> <p>Amend text to clarify.</p>

	<p>It is not clear in the third paragraph with the use of the term ‘such development’ what is being referred to – all development within the threshold or just that which meets a & b.</p> <p>The use of the term ‘feasible’ is too weak and will be difficult to measure</p> <p>It is unclear why reference to the Emerald Network is relevant when considering deficiencies in provision.</p> <p>There is no need to repeat the threshold towards the latter part of the policy. Furthermore, criterion c contradicts a & b. There is scope to refine the sections of the policy relating to criteria a – c so that it is clear and more concise.</p> <p>Protecting footpaths: This section of the policy is also about enhancing networks. As this is a lengthy policy it is important that the headings fully reflect the scope of a given section in the interests of clarity and usability.</p> <p>This part of the policy introduces a test with too high a bar when considered against NPPF and the emerging CDP.</p> <p>Use of ‘such as’ is not sufficiently clear as it provides an indication but not an absolute list. Examples should be included in the supporting text not the policy. Any lists should be fully closed lists in the interests of clarity and certainty.</p> <p>It is not clear what the neighbourhood plan is trying to prevent or how ‘substantial public benefit’ would be measured. Public health and safety maybe, or maybe substantial environmental benefit?</p>	<p>Amend text to clarify.</p> <p>Strengthen by referring to ‘viable’ to introduce a measurable test.</p> <p>Reconsider or clarify requirement scope.</p> <p>Amend title.</p> <p>Reconsider level of policy barr.</p> <p>Reconsider wording to address concern.</p> <p>Provide clarification.</p>
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<p>Protecting green corridors Green assets may include green corridors. The relationship between requirements in Protecting Green Assets and this section are too complicated to ensure correct interpretation.</p> <p>There is a switch in terminology which means that it is not clear if these are actually mapped or whether they are just all of the green assets or the emerald network or something else.</p> <p>Criterion f: it is not clear whether this is in relation to existing and/or new routes.</p> <p>Protecting trees and hedgerows: With regard to requirement for "...an equivalent number of trees and hedgerows should be planted." Whilst good in theory it is unclear how will this be achieved in practice? Land would need to be available to do this.</p> <p>The use of the term 'wherever possible' weakens the policy and is not required as the policy includes an exception clause.</p> <p>Reference should be made to new provision being native species.</p> <p>Protecting and enhancing the riverbanks: It is considered that the third paragraph should also include reference to pedestrian access.</p> <p>This may be possible on defined public rights of way but if there are routes on private land which are not defined as PROW its enforceability is questionable.</p> <p>It is not clear why the area mapped for both The Sands and The Racecourse should cover only the narrow corridor of the river banks. The description in the text of G1.1 appears to</p>	<p>Consider having one section which deals with exceptions and resulting requirements where harm or loss of any of the assets would result.</p> <p>Clarification required.</p> <p>Clarification required.</p> <p>Clarification required.</p> <p>Review mapping.</p>
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	<p>cover the whole of these features.</p> <p>The racecourse is noted as being the site of the Durham Miner's Gala – which occupies a larger area than the riverside corridor. The Sands is referred to as a grassed area with recreational value providing a venue for events – which describes the open green of The Sands and not just the narrow riverside strip. Consideration should be given to reviewing the mapping so that it corresponds more closely with the text.</p>	
<p>G2</p>	<p>The council has previously commented and raised concerns upon specific sites included within this policy including:</p> <p>That the 'characteristics that make these sites important and special to local people' have not been defined enough for development management officers to use the policy in decision making.</p> <p>The county council is particularly concerned about the inclusion of the DLI. Concern is also expressed regarding the inclusion of Neville's Cross Battlefield in relation to the proposals set out in the County Durham Plan. It is unclear as to why additional protection is required for these sites and what that protection is, as the tests seems to be the same in relation to those sites which already fall within defined green belt.</p> <p>The policy also fails to define what constitutes 'harm' or are 'appropriate mitigation measures'. The characteristics of each site do not appear to be summarised clearly for the reader's benefit in the interests of clarity.</p>	<p>Please refer to previous advice and comments provided (see attached document).</p> <p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

G3	The county council remains concerned about the impact that encouraging people to use the proposed network will have on its ecology. It is not clear that this has been adequately considered.	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
G4	<p>It is not clear why this policy is in two halves or why the first half is about “enhancing” the inner bowl, but the second half is about “not having a negative impact”? Is that to achieve a lower test for the outer bowl?</p> <p>The geographic references made within this policy need to be cross referenced to a map so that the reader knows precisely the extent of the areas in question.</p> <p>Criteria b & d: This should refer to openness of Green Belt also. The use of the word <i>‘impair’</i> is insufficiently clear and is subjective.</p> <p>It is not considered that this policy fully addresses the ‘beneficial use’ of green belt as set out in NPPF. Therefore, it has missed an opportunity to identify some specific proposals appropriate to those areas and does not offer any more policy direction and guidance to the reader than the existing policy context.</p>	<p>Clarification required.</p> <p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>
Theme 4		
Theme 4 General	Paragraph 4.140 states that “evidence indicates that there is an ample supply of student accommodation in Our Neighbourhood”, What evidence is being referred to?	
E1	This policy relies on policy S2 to set out the required standards for sustainability. However, that policy does not do that. It then goes on to include some criteria which look to be the standards. It assumes a masterplan for the site. The policy should simply set out the requirements for the development. This unfortunately results in confusion for the reader.	<p>The interplay between policy S2 & E1 needs to be reviewed.</p> <p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

	<p>This policy conflicts with a strategic allocation within the emerging CDP at Aykley Heads which is a larger site. It also includes an additional 'strategic' employment site at Mount Joy which we understand is not actually available. It is the county council's understanding that this extends beyond the scope of a neighbourhood plan, is not sufficiently evidenced and the latter site is not available.</p> <p>This policy misses out on real opportunities to expand on detail not provided in the emerging CDP to further explain what is appropriate for these sites and what their special characteristics are that should be incorporated into any scheme.</p> <p>Criterion a: The 'scarcity' of land is not quantified or evidenced by the neighbourhood plan and the policy does not define the 'required level of jobs'.</p> <p>Criterion b: It is not sufficiently clear as to what 'creating harmony' means.</p> <p>Criterion c: This is addressed in the CDP and therefore constitutes unnecessary repetition.</p> <p>Criterion d: It is not clear how the impact on travel can be 'continuously reduced'. The examples given are forms of mitigation, not necessarily a means of reducing.</p>	
E2	<p>This policy is unclear in its scope and intent. It reads like an allocations policy and it is unclear whether the plan seeks to resist demolition or protect existing uses and specific uses.</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

	<p>The final paragraph is very open ended, the result could be unintended development.</p> <p>The uses cited for Fowlers yard are considered to be too restrictive and this approach does not accord with NPPF in this regard.</p> <p>It is understood that there are unresolved issues regarding the Blagdon Depot, Franklin Lane site which poses a question over whether it is appropriate to include this within the list of specific sites and for the uses cited.</p> <p>The sites would benefit from being more clearly defined on Map 5. The old sorting office does not appear to be defined on the map.</p>	
E3	<p>There appears to be a tension between Policy E3 & E4 regarding the issue of any uses which do not improve cultural diversity and offer.</p> <p>The necessity for this policy is questioned as it repeats the emerging CDP unnecessarily without providing any additional detail to assist in decision making.</p> <p>Criterion b: This is aspirational and would be better related to the supporting text as its intent falls outside the scope of planning. Criterion c: This should also quote specific categories of uses from the Use Classes Order (UCO) for the avoidance of any doubt in case of any future changes to the UCO and so that it is not too open ended.</p> <p>It is not clear whether proposals need to both contribute to a lively and vibrant centre AND enhance the character and attractiveness? It is not clear to the reader what should happen if a proposal does not meet the criteria or has a neutral impact.</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>
E4	<p>This policy deals with an issue that is addressed in the emerging CDP. Whilst it goes further on the one hand to include 'cultural and diversity offer' the concern to the county council is the fact that it</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

	omits the aspect of public safety.	
E5	<p>The policy will be difficult to apply to existing attractions and misses opportunities to manage development of existing sites as criteria c, d & e could only be relevant in the main to new attractions.</p> <p>The policy is too prescriptive, it is not clear if all or just some of the criteria would need to be met.</p>	Further criteria may be necessary regarding existing sites, or the scope of the policy changed. Splitting criteria as per approach in Policy C1 would assist. The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
E6	<p>The policy will be difficult to apply to existing accommodation and misses opportunities to manage development of existing sites as criteria c, d & e could only be relevant in the main to new accommodation.</p> <p>The policy is too prescriptive, it is not clear if all or just some of the criteria would need to be met and the length of continuous occupation is not in accordance with the emerging CDP, tourists are unlikely to stay for 6 months so this may actually erode the availability of visitor accommodation.</p> <p>Criterion d: The term 'harmonious' is too subjective and does not set out what would be acceptable/ unacceptable. Also, if this is about safeguarding amenity then this should be made clear to the reader.</p> <p>Criterion e: This is not a policy criterion. It is a specific statement. There is no justification for the timeframe stated, this requirement needs evidenced and it may not be appropriate to have a blanket condition, particularly where the proposal is for an alteration to existing accommodation.</p>	Further criteria may be necessary, or the scope of the policy changed regarding existing accommodation. Splitting criteria as per approach in Policy C1 would assist. The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
Theme 5		
D1	The county council would question whether these need to be allocated. Whilst it is accepted that John Street is still pending, Main Street now has permission for offices and The Avenue is approved subject to S106.	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.

	<p>The desire to allocate 4 sites D1.4-D1.7 is flawed as it would in some cases go against policies elsewhere in the neighbourhood plan.</p> <p>It is noted that some but not all of the site's constraints are listed in the descriptions, for example D1.5 does not make clear that the existing substation would need to be relocated.</p>	
<p>D2</p>	<p>Paragraph 20 of NPPF notes '<i>Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development;</i>'</p> <p>There is concern that Policy D2 is seeking to cover a strategic matter. The council noted its intention to address the issue of PBSA in the Issues and Options Document (question 25) and prepared Preferred Options Stage and Pre-Submission Draft stage policies on PBSA, where the policy was specifically noted as being a strategic policy. In addition, this matter is already the subject of an interim policy which covers the whole of the county, including other parts of the city that fall beyond the designated neighbourhood area. The consequence would be a conflicting, policy approach to this strategic matter which falls beyond the scope of a neighbourhood plan.</p> <p>The policy mostly seems to reflect a version of the Interim Policy / emerging CDP policy. However, the following aspects are of concern:</p> <ul style="list-style-type: none"> • The allocations seem to reflect the output of the county council's call for sites, although they do not replicate the content in the County Durham Plan Pre-Submission draft (this would pose a conflict in decision taking with 	<p>This policy should be deleted.</p>

	<p>superfluous / inconsistent allocations). The allocations in the County Durham Plan are evidence based, therefore the inconsistent elements in the draft neighbourhood plan would be contrary to the council's evidence, with seemingly no alternative evidence offered.</p> <ul style="list-style-type: none"> • The policy contains a 10% test, which would have the (likely unintended) consequence of limiting otherwise appropriate campus-based development. • The policy includes a requirement for 20% of the total units for PBSA to be affordable, though the evidence base for this is unclear. In addition, it is questionable as to how the typical units within PBSA could be delivered and managed as affordable housing in line with the NPPF definition. If the policy is not deleted as recommended by the council then further clarification is required on this matter. 	
<p>D3</p>	<p>This policy is noted as a 'strategic policy' in the Preferred options and Pre-Submission Draft stage County Durham Plan. It was also subject to a question in the Issues and Options Document. This policy is therefore subject to the same overarching concerns as policy D2.</p> <p>Notwithstanding these concerns:</p> <ul style="list-style-type: none"> • The policy differs from the current interim policy and proposed approach as set out in the emerging County Durham Plan in that it omits an 'exception clause'. There may be circumstances where an exception is justified. • The policy differs from the proposed approach in the CDP (Pre-Submission) in that includes extensions that result in additional bed-space • The policy differs from the proposed approach in the CDP (Pre-Submission in respect of criterion g). • Para 4.183 proposes an Article 4 Direction for the neighbourhood area (as an action for the council to take 	<p>This policy should be deleted.</p>

	forward) this is not the remit of a neighbourhood plan.	
D4	<p>Again, this policy, as currently worded could be considered as a strategic policy as it seeks to 'make sufficient provision for: a) housing (including affordable housing)' (para 20 NPPF).</p> <p>This policy includes a student sub clause around the adaptability of PBSA which is likely to be overly onerous to PBSA developers and may leave the decision maker open to challenge.</p> <p>It is not clear why there is a sub section specific to younger people with disabilities. This needs to be evidenced.</p> <p>There is no definition of what is meant by younger people.</p> <p>Paragraph 4.184 states that nursing homes and residential care are covered in Policy C4, but sheltered housing and extra-care would seem to be covered by this policy. There appears to be some potential for some overlap?</p>	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy so that it is more locally specific.
D5	<p>This policy sets a lower affordable housing requirement than the CDP evidence base which indicates 25% would be appropriate in Durham City.</p> <p>The reference to a financial contribution needs to be based upon evidence that this can be achieved.</p>	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
D6	<p>Criterion g: It is not possible to require existing buildings to improve their energy efficiency. New buildings and extensions are already covered by Building Regulation requirements.</p> <p>As worded the reference to BFL is not policy. It is an assessment tool cannot be policy. Any reference to it should be included within supporting text only.</p>	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
Theme 6		
Theme 6	Extension of the Controlled Parking Zone is entirely a matter for the	The references regarding extension to the parking zone

<p>General</p>	<p>County Council.</p> <p>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.</p>	<p>should be deleted.</p> <p>Resolve contradiction.</p>
<p>T1</p>	<p>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>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>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>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>The policy and supporting text contain overlap with the emerging CDP: Policy 22 promotes well designed sustainable transport</p>	<p>The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>

	<p>modes in new residential areas, with a clear hierarchy that favours walking and cycling.</p> <p>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>It may not be possible to link with external foot and cycle networks if such routes are not already present.</p> <p>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>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>	
T2	<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>‘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> <p>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>	<p>Delete final sentence. The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.</p>
T3	<p>The emerging CDP will require 25% of specialist housing for older</p>	<p>The council would be happy to work closely with the Parish</p>

	<p>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>The council support the proposal to require secure cycle storage to be provided as part of new residential developments.</p>	Council to address the concerns raised about this policy.
Theme 7		
C1	<p>Criterion a: It is not possible to insist that the facility is open to all. The best that can be secured through the neighbourhood plan is for it to be accessible in terms of design and location, so the potential is there. That issue is covered by other criteria in the policy. If it was in the town centre there would be no requirement to demonstrate need.</p> <p>It is not clear how would to demonstrate a community need or whether the proposal would harm the viability of an existing facility?</p>	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
C2	The policy will be difficult to apply to alterations and extensions to existing buildings and may be missing opportunities to add value to managing development of existing sites as most criteria could only be applied to new accommodation.	Further criteria may be necessary, or the scope of the policy changed regarding existing accommodation. Splitting criteria as per approach in Policy C1 would assist. The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.
C3	Whilst the intent of this policy is supported in order to apply it there would need to be a definition of locality in order that the reader knows the geographical area of search. There could be such facilities outside the neighbourhood area which would suffice. Without such clarity it will be difficult to implement the policy. The supporting text should provide some guidance as to how to	The council would be happy to work closely with the Parish Council to address the concerns raised about this policy.

	undertake the tests associated with criteria a & b.	
C4	<p>Residential care homes may have differing requirements to the other uses. For example, the policy does not adequately reflect the need to consider compatibility of care homes with adjacent uses. This is a more sensitive use than the others cited in the policy.</p> <p>Criterion e excludes residential care homes when it should not. There are some operational requirements.</p>	Amend criterion g to reflect need to consider impacts that existing non-residential uses may have on a care home's amenity and impacts that a care home may have on the operation of an existing business.