

CATEGORISATION OF FURTHER COMMENTS AND PLANNING ISSUE OR ACTION IDENTIFIED FOR CONSIDERATION 23rd April 2018

The comments have unique codes as follows:

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

However, no personal details have been provided.

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

- L7: Durham Cathedral
 - L8: Durham City Cricket Club (DCCC)
 - L8a: Response
 - L9: Durham County Council (DCC) (hard copy and electronic)
 - L9b: Appendices A,B,C
 - L15: Gladman Developments
 - L16: Historic England
 - L20: National Grid (via Amec Foster Wheeler)
 - L21: Natural England
 - L23: Nevilles Cross Community Association
 - L25: Persimmon Homes
 - L27: The Empty Shop CIC
-
- The codes for categorising the comments are as follows:
 - c1: outside the remit of the neighbourhood plan
 - c1a: outside the Plan area
 - c1b: planning issue that has to be dealt with by the Council or by other bodies not by a neighbourhood plan
 - c1c: not a planning issue
 - c2: a generic style comment of praise, blame, opinion etc not requiring a response just an acknowledgement
 - c3: suggesting changes to the policies
 - c4: suggesting changes to the projects
 - c5: suggesting changes to the other text of the Plan

Comments have also been given traffic light shading where appropriate:

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

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	COMMENT CATEGORISATION	PLANNING ISSUE OR ACTION TO BE CONSIDERED
FURTHER COMMENTS		
EQ01 Give the city centre back to the people and make students go into university accommodation. What has been done to the city where no one lives in it for six months of the year is criminal. A beautiful city centre ruined by money grabbing landlords who couldn't care less about the environment. They don't even pay council tax yet get all the benefits which I have to pay for. Copied to Theme 4		Consider under Theme 4
EQ02 3. 6. "What is bad about Durham City Centre?" "North Road (tawdry and dirty, run down, ASB focus, charity shops, poor introduction to City for visitors": this is all too true, but alas it is not a novelty but has been true ever since I came to Durham in 1965. I think part of the problem is that local politicians, of all shades, have regularly had unrealistic ambitions for Durham as a great shopping centre: there are improvements which might work (book shops, antique shops, etc., which one would expect to find in a city such as Durham but does not; but tact and guidance will be needed to achieve shopping developments which work for Durham and will succeed. Copied to Theme 3		Consider under Theme 3
EQ03 I would like to commend those people who have worked very hard to put this draft plan in place.	C2. Congratulations	Noted
EQ04 I think it's important to get the views of students too, they may well be able to come up with some innovative ideas on how best to make Durham work for everyone. Also they might be best placed to put pressure on the university to work with us as their ratings of Durham as a place to study are of paramount importance to the university.	c2. Need students' views	Note: We have tried in a number of ways to obtain students' views
EQ05 I wholly support the retention of the green belt around Durham. Copied to Theme 2b		Consider under Theme 2b
EQ06 There is mention of modernising the taxi service using electric and hybrid vehicles. This in my mind should also include the Park and Ride buses and the small cathedral bus services. possible any short run service.		Consider under Theme 5

<p>Copied to Theme 5</p>		
<p>EQ10 Some of the information presented appears to be out of date. How can you guarantee that DCC will support or actively incorporate NPF plans into their Durham Plan which has not been produced yet? The road system within Durham City is limited as far as possible development is concerned and potentially a system of traffic control using advanced technology will be the way to go within the City. It is difficult to understand how any of the main road arteries leading into and out of the city, such as Church Street, Hallgarth Street Whinney Hill can not be designated as anything other than heavily used main roads when the yearly increased volume of traffic (cars, cyclists, taxi cabs, delivery vans, university maintenance vehicles, mini buses, public transport buses, coaches etc) constantly uses them and yet no extra infrastructure is built to cater for it. Maybe it should be admitted that Durham City is a small city and consequently there is only so much development it can realistically cater for. More emphasis required on general infrastructure development within the City. This has not been a strong point of DCC's and consequently this needs to be addressed as a matter of urgency. Copied to Theme 5</p>	<p>c2. Out of date information c1b. Incorporating NPF plans into Local plan outside remit: up to Council</p>	<p>Consider checking the currency of information No action Road system consider under Theme 5</p>
<p>EQ13 Most of the projects to improve the neighbourhood are sensible, though very doubtful about what is meant by a rolling scheme of cycle improvements. Much too vague and do not this is included in present plan. Copied to Theme 5 There is a need for a comprehensive record of plant and animal life in the area. University staff did make a limited study, but it should cover the whole region. I think there was also a County Council study in the early 1980s, but am unaware of its current status. Copied to Theme 2b</p>	<p>c4. Support for projects</p>	<p>Noted Consider under Theme 5 Consider under Theme 2b</p>
<p>EQ15 This is where aspiration meets reality. As a mere resident it is clear that we need: 1. A strong body to represent the Plan. The Forum has worked hard and long to make this set of robust, necessary, sensible and eminently supportable policies. 2. Leadership and Continuity separate from the County Council to ensure that the latter meets our needs, and not vice versa! 3. The City Parish Council to be a supportive and empowered body.</p>	<p>c2. support for policies c2. Suggestions for implementation</p>	<p>Noted Consider for Chapter 5</p>

Thank you for everything.	c2. Thanks	Noted
EQ16 Stop the landlords buying up houses to convert this is driving residents out of Durham so reducing the local indigenous population. It also reduces the number of residents who can afford the houses and who would shop locally. There is pressure on the schools as the children have to drive by car /bus so causing traffic problems. Is Durham City becoming a dormitory town for the University? Copied to Theme 4		Consider under Theme 4
EQ17 Thank you	c2. Thanks	Noted
EQ18 With thanks to the team who have worked so hard to put together this excellent Plan.	c2. Thanks	Noted
Q14 Well run event	c2. Praise	Noted
Q15 Its all very well – BUT I think it is too late for Durham. The DCC and the University between them are destroying the town. No visitor is going to want to come here and students are not going to come either.	c2. Too late	Noted
Q24 The overall plan seems to be very anti university. Surely we should explore and aspire to more collaborative initiatives.	c2. Anti university	Consider how University covered in Plan
Q29 * Non payment of council tax on student accommodation must be addressed * Copied to Theme 4		Consider under Theme 4
Q30 * Thank you for not assuming everyone has access to email *	c2. Praise for consultation process	Noted
Q35 I is appalling that Durham County has no Council Museum – many archaeological finds are stored at Bowes as Durham City has no appropriate facilities. An arts centre cum museum would be wonderful. It is a shame that the space in Millennium Place & at the bottom of Claypath is now to be another hotel. The Hub could also provide info re accommodation for tourists. Copied to Theme 6		Consider under Theme 6
Q37 Find all the projects on back page would be most welcome additions to the viability and benefit of living in our area of City. Just wish to add thanks & commendation for all the work contributed by those volunteers who constructed the Neighbourhood Plan and to comment on the efficiency of the website and its ease of use.	c2. Support for projects c2. Thanks and praise	Noted Noted

EQ20 Failure to include recognition of, or include policies to build on, the positive contributions that Durham University makes to the economy and culture of the City is a major shortcoming that must be redressed.	c3.c5 Lack of coverage of positive contributions of the University	Consider coverage of the University in the Plan
EQ21 The compilers of this document are to be congratulated.	c2. Praise	Noted
EQ23 No	None	
EQ24 Currently it seems that there's very little planning on the direction of how the County Council would like Durham to look in the future. In order to maintain the current allure of the city, a more clearly outlined and defined plan is required like this one.	c1b. Lack of Council plans for the City. Outside remit, down to council	No action
EQ25 One point I think that might not have been considered is food sustainability and food waste, and working together as a community to ensure we reduce this. Maybe a mention of support for local projects that are trying to tackle this issue would be helpful? Copied from Theme 1 This is such a comprehensive and cohesive plan, it fills me with a lot of hope about the future of our city!	c4.c3. Addition to projects re food sustainability, and to Theme 1 c2. Support for Plan	Consider additions to projects and to Theme 1 Noted
EQ27 I am worried about what might happen if Durham prison is to be redeveloped. I am also concerned about where they might rehouse County Hall because it is a municipal building planning permission won't be needed. Copied to Theme 4 The green space at the rear of the present County Hall is used by many including deer and other wildlife and it would be a shame to lose it - it is the green spaces that make Durham the city it is. Copied to Theme 2b		Consider under Theme 4 Consider under Theme 2b
EQ30 an excellent, well thought out plan. especially pleased that you are so strong on the green issues. what you suggest is the Durham City I would like to live in.	c2. Support for Plan	Noted
EQ31 Every policy would benefit from the addition of one to a few sentences stating what they aim to achieve. There is some confusion between the projects in Chapter 5 and Appendix A. 5.2. Should provide the discussion about the need for projects, their purpose and how they could be implemented, incorporating paras 1 and 2 from Appendix A. All the projects should then be listed in Appendix A, with duplication dealt with e.g. Policy Implementation Project 4 and Project 14.	c3.c5. Add in aims of policies c4. c5. Confusion between projects in Chapter 5 and Appendix A	Consider adding in aims Consider how projects covered in Plan

EQ33 The plan sounds very good. I am no expert, but this is my honest opinion. I wish you good luck.	c2. Support for Plan	Noted
EQ34 I very much appreciate all the work of the Forum and support the proposals of the Neighbourhood Plan.	c2. Support for Plan c2. Thanks	Noted
EQ39 I have spent a good deal of time with this plan - and I am hugely grateful to the volunteers who have put together this impressive way forward for Durham. I am less proud of Durham today than I was in the first 10 years of my 40 or so years in Durham. While some parts of the City have improved, all too many have deteriorated. I strongly favour implementation of policies contained in this carefully devised plan.	c2. Support for Plan c2. Thanks	Noted
EQ40 Thank you to all who helped put all the hard work into creating this plan.	c2. Thanks	Noted
EQ42 I fully support and am encouraged by the details, direction and spirit of the City Neighbourhood Plan which clearly communicates vital proposals to preserve and enhance the city for residents, visitors and local biodiversity.	c2. Support for Plan	Noted
EQ43 On behalf of Empty Shop CIC I am pleased to endorse the Neighbourhood Planning Forum's draft plan. The majority of policies and overall objectives of the plan are to be welcomed. Where we have raised question marks in our response to the consultation we have done so in a constructive and supportive spirit. We particularly welcome the commitment throughout the plan to a rich community life that places heritage, culture and town-centre appropriate business at the heart of the neighbourhood. Attempts through draft policy to create a more balanced economic and residential make-up - whilst preserving the city's character - are much needed.	c2. Support for Plan	Noted Note: Their other comments covered under individual Themes
EQ45 Thank you to the hard work of the members of npf for creating such a thorough plan to safeguard the future of Durham and meet the needs of all residents and visitors.	c2. Support for Plan c2. Thanks	Noted
EQ46 Love the plan, I hope to see it in action soon! Great work for putting together, and I sincerely hope it is put to good use.	c2. Support for Plan c2. Praise	Noted

<p>EQ48 A plea for more mixed, sustainable development. Any policy that enhances a balance of resident vs non-resident population would be most helpful: in terms of housing, infrastructure, amenities, access to retail. Perhaps a closer look at, and adoption of (as appropriate) planning policies in comparable university towns might help to keep the CDNP up to date? See Oxford, Cambridge, St Andrews. Thank you. Copied to Theme 1</p>	<p>c2. Thanks c2. Look at other Neighbourhood plans</p>	<p>Noted Consider looking at the other neighbourhood plans Consider under Theme 1</p>
<p>EQ49 In my view the Consultation Draft has very effectively reflected and operationalised the concerns and aspirations of the residents of the plan area in a way that the current planning structure has signally failed to do. It deserves to be commended and supported.</p>	<p>c2. Support for Plan c2. Praise</p>	<p>Noted</p>
<p>EQ50 I wonder, given the pressure to increase student numbers, if fruitful comparison might be made with the situation in Oxford, where I believe planning policy requires the university to provide a specific amount of suitable accommodation for students in order not to squeeze out local residents. This continues to be a growing concern. Copied to Theme 4</p>		<p>Consider under Theme 4</p>
<p>EQ52 The plan is comprehensive, well thought out and promotes proposals necessary for the city to continue to flourish.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>EQ54 The city needs a policy to get city centre shops all back in use. Copied to Theme 3 A very thorough plan which should do a lot to help the city if implemented.</p>	<p>c2. Support for Plan</p>	<p>Consider under Theme 3 Noted</p>
<p>Q39 I'm full of grateful admiration for all this thoughtful and generous work!</p>	<p>c2. Praise</p>	<p>Noted</p>
<p>Q46 My comment on all the themes is a heartfelt thanks for all the hard work that has gone into drafting the consultation paper for the Neighbourhood Plan.</p>	<p>c2. Thanks</p>	<p>Noted</p>
<p>Q58 I am grateful for all the hard work and professionalism you have dedicated to this Plan in the interests of all residents. I do hope it influences the County Durham Plan when it finally emerges.</p>	<p>c2. Thanks</p>	<p>Noted</p>
<p>Q60 Improvement projects I particularly liked Projects no. 1,2,5,6,7,8,9,10,12,13,14 (15) Copied from Theme 5</p>	<p>c4. Support for projects</p>	<p>Noted</p>
<p>Q61 I am in complete agreement with the entire plan. Copied from Theme</p>	<p>c2. Support for Plan</p>	<p>Noted</p>

1		
Q62 Surely "Project 5" should be covered by a specific Policy? Ditto "Project 9", "Project 11" and "Project 13, "Project 15" etc. How else can you enforce compliance?	c1.c Projects should be policies. Outside remit, not a planning issue	No action. Note: The contents of the projects are aspects that cannot be covered in the Plan policies
Q63 Plan layout can be confusing. Multiple sequences, Themes, paragraphs, policies, sub-sections, each numbered or lettered, need simplification, if possible. Otherwise congratulations on a comprehensive complex Draft.	c5. Confusing layout c2. Praise	Consider Plan layout Noted
EM1. How come half the meetings are after the period of consultation. Sounds like an insult to me. Forum response: Forum response (summary). Informed the respondent that this was not the case. Correct dates of consultation period, and details of remaining consultation events, provided.		Issue addressed during consultation
EM2. We have read the Plan from cover to cover, and have nothing but admiration for it. It should be adopted at once – it covers all the bases we can think of, and more, and we are full of gratitude to you and your colleagues for all the time and effort that you have put in to it. Congratulations! Forum response (summary). Thanks sent.	c2. Support for Plan c2. Thanks	Noted
EM4. I was unable to complete the questionnaire on-line I agree with all the themes I am concerned about the impact of increased student numbers on the city the infra structure is not designed for this number of people it is particularly a problem as students move between lectures The people completing the plan have done an incredible amount of work and should be congratulated on this thank you	c2. Support for Plan c2. Thanks	Noted
EM5. EXCITING TIMES..BUT DURHAM BECOMING OVERRUN OVERWHELMED BY STUDENTS	c1b. Concern over student numbers. outside remit, down to Council and University	No action
EM6 Response to Forum publicity about forthcoming end of consultation period:	c2. Support for Plan	Noted

<p>Yes, I've commented directly to the web site. Completely in support! Hope it goes well.</p>		
<p>EM9 Forum email contact in response to questionnaire comment [Q57] that there was no draft plan only a list of Vision and Objectives along with Themes. Provided details of how the full plan document could be located and viewed. Respondent: With due respect, I saw NO draft plan. The volunteers at the drop in centre at St Nicholas Church could NOT show me a plan of all the actual proposed layout of area of homes to be built, improved shopping facilities, business developments, office spaces, community facilities, road network changes, improvements along the River Wear, etc. All that we saw a list of Visions and Objectives. We asked a volunteer about the plan and he could NOT enlighten me. He talked around the subject but not about the subject. A lot of time and effort went into showing current maps and collated information (which was very informative) which was displayed but NO blue print, images, model OR layout were on display for the public to view. I am sorry to disagree with you. Perhaps you could point me in the right direction so that I can see the proposed full Plan document that Durham would like in, for example, 10 years time. Forum response: Provided details of how to access the full Plan document. Just in case there's a misunderstanding, the Draft Durham City Neighbourhood Plan is a document with policies and explanations and maps showing the proposed employment sites, housing sites etc. There aren't any road and vehicular traffic and public transport proposals because the County Council requires that we leave those matters to them. Nor are there visualisations or models of what Durham would look like in 10 years time - that would be great but is way beyond the capacity and resources of a group of volunteers. Respondent: It seems that we differ on the interpretation of the word "Plan". I did see the booklets, display boards with information, maps, etc. and I also</p>		<p>Issue addressed during consultation Note: Respondent's expectations not the function of a neighbourhood Plan</p>

<p>looked at the web-site. The Draft Plan appeared to me to be a list of Visions and Objectives. I did look at the display in the Clayport Library. What I was looking for was: 1. The original plan submitted by Durham Council which was rejected - with reasons for its rejection. (That was not shown but could have been a starting point.) 2. A map showing Durham City - a) now - start point b) proposed developments in the pipeline - agreed planning developments - mid point c) possible future projections on developments - final point 2c would include the possible items listed within the "Draft Plan" superimposed on the city map. Item 2 would not have been too time demanding to map out. The visual progression would have much more impact such as proposals required for Planning Permission. It could have been shown on a map of Durham City. ... I did see that a lot of work had gone into that which was displayed.</p>		
<p>EM10 We will be submitting our completed form - probably later today [Q69] - but just wished to congratulate the Forum on the work done to draft the plan and the supporting documentation. We had a valuable discussion with several of your members at the St Oswald's briefing session and appreciate the time that was put in to that. The City HAS to be rebalanced - we are not going to agree on everything but surely we have a common cause in protecting the City as a place to LIVE, not just as a student dormitory.</p>	<p>c2. Praise</p>	<p>Noted</p>
<p>EM11 Thanks for getting in touch with Shelter. I have now forwarded your e-mail onto our North East office which covers the Durham area for their attention so they will have all the details. If anyone would like to discuss further or requires any more information other than what you have already given then I will ensure they get in touch.</p>		<p>Issue addressed during consultation</p>

<p>Many thanks and best wishes, [No follow up response received]</p>		
<p>EM14 From JW Wood Property Management, Lettings & Student, requesting an explanation of “Regulation14 Provisions”. Forum response: Sorry for the legalism, all it means is that the process laid down by the Government for the preparation of a neighbourhood plan (a child of the Localism Act 2011) requires that when the group of people that comprise the local Neighbourhood Planning Forum have reached the stage of a written draft plan there has to be a six week period of public consultations so that businesses and residents and statutory and voluntary bodies can express their views and suggest changes (particularly improvements) to the draft policies. That is where we are at now. So, as a very significant business in Durham it is important that J W Wood looks, if it wishes, at the Draft Plan and makes comments. I say this because one of the fundamental reasons for preparing the Neighbourhood Plan here is to take forward the National Planning Policy Framework's principles for sustainable, inclusive and mixed communities. Accordingly, we are adopting the County Council's Interim Policies for student accommodation and indeed suggesting some tweaks. Once the 6 week consultation period finishes on 18th December we will make changes and improvements and then hand the Plan over to the County Council for them to do the rest of the process (more Regulations!) including a public referendum and finally formal adoption of the Plan as the up-to-date development plan for the area. If you or a colleague would like one of us to pop in to talk about all this please do not hesitate to say.</p>		<p>Issue addressed during consultation</p>
<p>EM15. I am a permanent resident and I fully support the Plan. I wish to make comments about the following sections: <ul style="list-style-type: none"> • Theme 6. A City with an enriched community life, with particular reference to Policy C1 • Chapter 5: Implementation and Monitoring / 5.2: Projects to implement Plan Policies / Policy Implementation Project 3: Policy C1 - Community Arts </p>	<p>c2. Support for Plan c4. Comments about projects</p>	<p>Noted Consider changes to projects</p>

<p>Facilities</p> <ul style="list-style-type: none"> • General Comments regarding the concept of ‘Projects’ within the Plan • Theme 5: A City with a Modern and Sustainable Transport Infrastructure <p>/ Pedestrian Issues [See comments copied into appropriate themes] Chapter 5: Implementation and Monitoring - 5.2: Projects to implement Plan Policies Some of Our Neighbourhood Planning policies and proposals benefit from additional implementation projects. Policy Implementation Project 3: Policy C1 - Community Arts Facilities (text at time of consultation) 5.7 During the process of public consultation, the need for improvements in facilities for the arts in the City were identified (Durham City Neighbourhood Planning Forum, 2017). This project includes three key aspects:</p> <ul style="list-style-type: none"> • a range of community arts facilities - studio spaces for artists, rooms for courses and rehearsal space, art and crafts workshops for residents of all ages and rooms for meetings of art organisations; • a City art gallery, including gallery space for permanent and temporary exhibitions by national and local artists; • a creative business centre for local artists and/or more independent shops to help small creative businesses to sell their products, build a consumer base and give local artists ore exposure. <p>Comments</p> <ul style="list-style-type: none"> • First bullet should read – arts facilities, not community arts facilities. <p>Also need for permanent studio spaces</p> <ul style="list-style-type: none"> • Second bullet –should read ‘a range of gallery spaces’ <p>5.8 In order to implement this project when the Forum ceases to exist, it will be necessary to do two things: (text at time of Consultation) 1.The Forum will continue to consult with organisations and partnerships involved with the arts and culture in Our Neighbourhood, during the development of the Plan. This will be in order to support their existing strategies to improve facilities for the arts in the City and to encourage them to address elements of this project in any of their future strategies for the City. This includes working with Durham County Council, a possible future Town Council, the Durham City Action Area Partnership, Durham University;</p>		
--	--	--

the Cathedral Dean and Chapter, Durham BID (The Durham Business Improvement District Committee), the Chamber of Trade, the County Durham Cultural Partnership; Durham Creatives, Visit County Durham, The Empty Shop and other local and regional organisations.

2.A Durham City Regeneration Body (a company limited by guarantee) could be set up in the future. The improvement of facilities for the arts would be part of its brief and the Body could work alongside a possible future Town Council.

Comments

1. The following three potential new facilities are in the planning phase at the time of this Consultation, (December 2017) and need to be reflected in this section:

- Plans are underway for a County Council run contemporary art gallery in the former Tourist Information Centre at the Gala Theatre to open in 2018.
- Durham Miners Association is currently working towards the opening up of the Durham Miners Halls at Redhills for community use for practice, performance and events. This is dependent on the successful raising of significant financial investment.
- Durham University are also exploring opportunities to open up their extensive 20th Century Art collection to the community and piloted the 'Bailey Gallery' scheme in June 2016.

2. The Parish Council will be in place in 2018 and therefore the phrase 'a possible future Town Council needs to be changed to 'the future Parish Council' Part of its role is to 'undertake projects and schemes that benefit local residents' and 'work in partnership with other bodies to achieve benefits for the parish,' (Cumbria Association of Local Councils)

- The concept of a Durham City Regeneration Body needs to be discussed in full by the Working Party. Would such an organization be created at the same time as the Parish Council? What 'projects and schemes' would it be responsible for? Will the Parish Council fulfil the role needed to take the Projects outlined in the Neighbourhood Plan forward, without a regeneration Body?

- Also need to discuss the importance of 'loose partnerships' brought together on a project by project basis, as opposed to a large monolithic

<p>organisation General Comments regarding the concept of 'Projects' within the Plan I think the concept of Projects is confusing within the Plan I'm not sure if there is a clear distinction for the public between the projects identified in Chapter 5 / 5.2 (Projects to Implement Plan Policies) and those outlined in Appendix A (Projects to improve the economic, social and environmental realm) There appears to be a hierarchy here, with the projects defined in 5.2 being the key ones, supporting policies and Appendix A – the wish list. Additional Neighbourhood Plan Consultation comment - Comment I wish to make an additional comment regarding 5.2 Projects to implement Plan Policies/ Policy Implementation Project 3- Policy C1. This section in my first response to the Consultation (16 December 2017) states: 'Durham Miners Association is currently working towards the opening up of the Durham Miners Halls at Redhills for community use for practice, performance and events. This is dependent on the successful raising of significant financial investment'. I would like to change this paragraph to: There has recently been an announcement regarding the current Miners' Hall at Redhill,s for a 5 year plan to preserve the building and bring it to the point where people can celebrate, practice and display the living heritage and culture of the North East. I believe The Forum should support this project in any way possible.</p>		
<p>WC1 Comment on your post "Assessment" I have to agree with ... that this is an exceptionally well composed document and I will add comment to the areas in which I profess some expertise (others may disagree) and whilst this may go against the grain of some views I would suggest that this document invites diverse views and it would strange if all parties agreed with all proposals. A big thanks you to all concerned, it is truly an epic piece of work</p>	<p>c2. Thanks</p>	<p>Noted</p>
<p>WC3 Comment on your post "Contents" The 'plan' appears to suggest we live at present in a 'beautiful and historic city'. This is not the case. Durham City, which is more than just the peninsular, has already been damaged irrevocably by irresponsible policies</p>	<p>c2. Plan not recognising the damage to the City</p>	<p>Consider coverage of this in Plan</p>

from the County Council, University, past City Councils and Parliament, and is sadly now an imbalanced community which is set to get even worse. This plan fails to recognise these issues.		
WC7 Comment on your post "Policy D2" Copied from Policy D2 The vitally important role of the university in this city must be recognised.	c2. Role of University in City	Consider coverage of University in the Plan
WC10 Comment on your post "Plan as pdf" There is too much in this plan to comment on all its details. Suffice it to say that I applaud the effort, agree with its approach and wish it all the best in trying to influence actual planning policy and development in Durham City. I limit specific comment to one matter, that of trees in the WHS and urban space in general [Copied to Theme 2b].	c2. Support for Plan c2. Thanks	Noted Trees covered under Theme 2b
WC12 Comment on your post "Chapter 1: Foreword" The draft Neighbourhood Plan represents tremendous work in progress for which thanks are due to those who have been and will continue to be engaged in its finalisation. It is in my view very important that in commenting on the draft at this stage those who do so bear in mind that this Plan is intended to guide the development of Durham City until 2033.	c2. Thanks	Noted
WC13 Comment on your post "Chapter 2: Introduction" Scope of Neighbourhood Plan It is worth pointing out that possible developments outside Our Neighbourhood and therefore outwith the scope of the Plan could nevertheless have major implications for the City-for better or worse eg the re-opening of the Leamside Line, or the extension of park-and-ride provision. It would, in my view, be a lost opportunity not to go on record in relation to such threats and opportunities.	c2. Cover outside developments and their implication	Consider covering these in Plan
WC14 Comment on your post "Chapter 3: Vision and Objectives" I fully support the Themes and Objectives and applaud the way through which they have been defined.	c2. Support for Plan c2. Praise	Noted
WC47 Comment on your post "Chapter 5: Implementation and Monitoring" Copied to Theme 5 CHAPTER 5-IMPLEMENTATION & MONITORING Whilst I understand and accept that the NPF will not be the body that	c3. More promotion of desirable development	Consider how policies could achieve this

<p>undertakes implementation and monitoring of our Neighbourhood Plan, my sense is that the draft Plan in its current form is less strong in helping to promote desirable development than it will be in preventing undesirable development.</p> <p>Many people may think that, in a place like Durham, this should be the effect of the Plan.</p> <p>However, with a view to the Plan being more pro-active which I think it needs to be, I suggest that the Projects listed in Appendix A should include reference to the need for the Railway Station, Bus Station (on its current site please), and North Durham Hospital to be adapted over the course of the Plan period and beyond to meet the growing and changing needs of users. In addition I would wish to see a clear proposal for the extension of "park & ride" facilities to serve traffic from the south-west from Langley Moor, Meadowfield and beyond, and from the west of the City via Broom Lane. Our Neighbourhood would derive significant additional value from such a facility which might be capable of location on a site adjacent to the A 690 in the Stone Bridge area, even though it would lie just outside the Our Neighbourhood area</p>	<p>c4. Additions to projects</p>	<p>Consider additions to projects</p>
<p>WC53 Comment on your post "The Plan"</p> <p>This is a comprehensive and thorough report which recognises the many positive aspects of the plan area and its fragility in the face of many competing pressures. It provides an opportunity for those of us who care deeply about the city in which we live to define what makes the city special, to celebrate that which is good, and give direction to future changes that will enhance rather than destroy.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>WC54 Comment on your post "The Plan"</p> <p>Durham City Neighbourhood Plan;</p> <p>The plan has been very well thought out. It is clearly drafted by a team that understand Durham very well.</p> <p>I agree with all aims and strategies suggested. It is a practical solution for many of the problems facing Durham at the moment. The plan foresees Durham's potential without needing to destroy further the special qualities of the city.</p> <p>I would like my views to be recorded as support for this plan.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>

<p>WC55 Comment on your post "Plan as pdf" These are my views and while they may not be shared by all, as a person who lives in the city itself I agree wholeheartedly with this plan. It has been developed by people who obviously know Durham City well and understand all the current problems and pressures suffered by the people who do actually live in the city. I do hope Durham County Council take heed and do not try and dilute this plan. The plan is well thought out, well written and much needed. Please protect the heritage, green spaces and architecture and support permanent families in the city itself. Control further takeover of the city by Durham University. Encourage Durham County Council to regenerate villages and communities across the whole county.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>WC60 Comment on your post "Maps" These maps are brilliant. Two suggestions. [Copied to Theme 2b and Theme 4]</p>	<p>c2. Praise</p>	<p>Noted Consider specific points under Themes 2b and 4</p>
<p>WC61 Comment on your post "Chapter 1: Foreword" This Neighbourhood Plan has lifted my spirits about the future for Durham after years of worrying about inappropriate development and declining civil society. The website and accompanying literature/maps come over as thoroughly professional, carefully thought through, and admirably succinct. Many thanks to everyone who has put so much voluntary effort into it on behalf of the wider community.</p>	<p>c2. Praise c2. Thanks</p>	<p>Noted</p>
<p>WC62 Comment on your post "Chapter 2: Introduction" Is there any way of including Gilesgate and Dragonville up to the A1(M) in the neighbourhood? They are often depicted as part of Durham in other maps eg: the Conservation areas of the city, Ordinance Survey maps etc, and it doesn't feel right to see them cut off. Maybe Gilesgate and Dragonville residents could be invited to vote on their preferences?</p>	<p>c1a.b Locations outside remit (outside area, and down to Council)</p>	<p>No action Note: The Council set the boundary of the Neighbourhood Plan area</p>
<p>WC68 Comment on your post "Summary: Projects to Improve Our Neighbourhood" I agree with all of the above.</p>	<p>c4. Support for Projects</p>	<p>Noted</p>
<p>WC79 Comment on your post "Chapter 5: Implementation and Monitoring" This is where aspiration meets reality.</p>	<p>c5. Suggestions for implementation</p>	<p>Consider under Chapter 5</p>

<p>As a mere resident it is clear that we need: 1. A strong body to represent the Plan. The Forum has worked hard and long to make this set of robust, necessary, sensible and eminently supportable policies. 2. Leadership and Continuity separate from the County Council to ensure that the latter meets our needs, and not vice versa! 3. The City Parish Council to be a supportive and empowered body. I agree with WC47, WC56 comments Thank you for everything.</p>	<p>c2. Thanks</p>	<p>Noted</p>
<p>WC86 Comment on your post "Plan as pdf" The Durham Neighbourhood Plan is comprehensive and well thought out. If implemented it would greatly improve the chances of Durham retaining its unique character of impressive historic buildings housing mainly educational activity in a pleasant environment. The plan details how the character of the city could be enhanced by appropriate planning to give the city a sustainable future, maintain its heritage and green infrastructure, promote a diverse economy and provide attractive affordable places to live based around a modern transport system. The policies proposed are realistic and go a long way towards achieving the stated aims. The need for the Durham Neighbourhood Plan arose from the concerns of local people about the deterioration of the quality of community life over the past 10 years. Policies such as those to enhance green spaces and encourage new and improve existing community facilities are greatly needed in Durham today.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>WC90 Comment on your post "Chapter 3: Vision and Objectives" This is a very clear set of statements as to what needs to be done, based, refreshingly, on a thorough analysis of community opinion.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>WC91 Comment on your post "Chapter 2: Introduction" The challenges outlined in 2.6 and 2.7, the growth of the University and the change in property use, must be seen as of paramount importance. If these issues are not properly resolved, much endeavour elsewhere may be futile.</p>	<p>c2. Need to address challenges</p>	<p>Consider how challenges addressed in Plan</p>
<p>WC92 Comment on your post "Chapter 1: Foreword" There has been a near-complete absence of formal planning for the city itself for some time. This Neighbourhood plan is admirable.</p>	<p>c2. Praise</p>	<p>Noted</p>

<p>WC97 Comment on your post "The Plan" This plan has obviously been well thought through by people who are passionate about Durham City and who want to retain it's individuality whilst recognising the need to move forward. That balance is not easy but if the plan is taken on board I believe it would help immensely. There is so much building work going on at the moment which makes it hard to see where Durham is actually heading, but I hope that the plan will force the powers that be to realise that students are not the be all and end all. They have got to cater for the existing and future residents, and make it affordable for young families to live and prosper in our lovely city. [Copied to theme 4]</p>	<p>c2. Support for plan</p>	<p>Noted Also consider under Theme 4</p>
<p>WC98 Comment on your post "Chapter 5: Implementation and Monitoring" Some concluding remarks from the SRA: * while our discussion did not look at every policy in detail, we are overall supportive of the plan and there are no individual policies to which we voiced an objection. * apart from individual policies, what is needed above all is a Masterplan to ensure connectivity between the different developments that are proposed. Lack of such oversight is seen clearly in the fact that both the Gates and Milburngate redevelopments include a cinema and there is no clear scheme to link the two neighbouring sites. This is the concept of town planning, but we only seem to consider individual planning applications. Even on the same site (eg Maiden Castle) applications come forward piecemeal so that the overall impact is never considered.</p>	<p>c2. Support for plan c2 Need for a Durham City masterplan</p>	<p>Noted Consider point re masterplan</p>
<p>WC100 Comment on your post The SRA fully supports this policy [D4] and would like consideration to be given to the development of Durham as a dementia friendly city. This would have implications beyond housing.</p>	<p>c2. Develop Durham as a dementia friendly city</p>	<p>Consider covering in plan</p>
<p>WC109 Comment on your post "Chapter 1: Foreword" The Sidegate Residents' Association held a special meeting to discuss the draft plan and was completely supportive of the overall direction of the plan and very appreciative of the work that had gone into it. Detailed comments will be made at appropriate points in the plan.</p>	<p>c2. Support for Plan c2. Thanks</p>	<p>Noted</p>
<p>WC124 Comment on your post "Summary: Projects to Improve Our Neighbourhood"</p>	<p>c2. Support for Plan</p>	<p>Noted</p>

<p>I agree with the the majority of these proposals. However, the provision of a taxis in Durham City should be regulated. At this time there appears to be far too many taxis for the number of potential users. Moreover, 'the jury is still out' with regard to electric and hybrid vehicles. First, there is no assurance that current generation of electricity is sufficient to sustain a significant increase in the number of electric vehicles, the increase in the import of electricity, via 'connectors' to Europe, threatens our emergency security and the next generation of super clean diesel engines where the air coming out of the exhaust is cleaner than the air going into the engine is just around the corner! Copied to Theme 5</p>	<p>c1b. Regulation of taxis outside remit (for Council)</p>	<p>No action Consider under Theme 5</p>
<p>WC134 Comment on your post "Chapter 5: Implementation and Monitoring" Conversations with members of the public at drop-in events made me aware of confusion about the projects mentioned in Chapter 5 and those in Appendix A. We need a thorough review of these two sections to strengthen them and remove any confusion.</p>	<p>c4. c5. Confusion between projects in Chapter 5 and Appendix A</p>	<p>Consider how projects covered in Plan</p>
<p>WC140 Comment on your post "Chapter 2: Introduction" The plan's boundaries should include all the Conservation Area in Gilesgate, Old Durham etc,it is not entirely clear if these are included,ideally it should also include other parts of Gilesgate that impact on the setting of the Conservation Area and the entrance into the city. In addition the setting to the Conservation area elsewhere and the World Heritage site is important and the plan should include within its boundaries perhaps some of the fields and farmlands in the Old Durham area and elsewhere. Impacts of outside development beyond the boundaries need to be considered.</p>	<p>c1a.b Locations outside remit (outside area, and down to Council) c2. Consider impact of outside developments</p>	<p>No action Note: The Council set the boundary of the Neighbourhood Plan area Consider how to cover in Plan</p>
<p>WC141 Comment on your post "The Plan" I agree with all of [WC97 and WC54] comments and would like to add that I thought the presentations were great. they were very well structured and staffed by knowledgeable volunteers. I would like to see the information boards displayed in the city centre for others to view. I think the issues addressed effect everyone using the city not just those who are lucky enough to reside in the designated area.</p>	<p>c2. Praise for consultation process</p>	<p>Noted</p>
<p>WC142 Comment on your post "The Plan"</p>	<p>c2. Support for Plan</p>	<p>Noted</p>

<p>The Neighbourhood Plan is well researched and put together with clear policies. I am very concerned about the lack of a clear policy in relation to student housing coming from the County Council . The Neighbourhood Plan puts this in perspective and provides a good stepping stone to get to grips with the issues. The thread of sustainable development principles throughout the plan is very welcome. Durham City has such a small but very precious city centre , it is vital that future development respects this in terms of heritage and sustainable development .I wholly support the policies and intentions in the plan.</p>		
<p>WC151 Comment on your post "Theme 1: A City with a Sustainable Future" Copied from Theme 1 THEME 1. Upon reflection I am clear that by far the biggest single challenge facing the City in the Plan period will be how the University will be permitted to progress its further growth aspirations and how the further worsening of the already severe imbalance between "Town & Gown"can be managed. Further University growth within the City on the scale recently announced will further substantially damage our City,create further pressures on infrastructure and support services, and challenge sustainability. Would I be naive in hoping that, once the Neighbourhood Plan is approved and in place, the planning system will enable unsustainable planning applications submitted piecemeal to be identified and rejected? At this late stage is there any way that the Neighbourhood Plan could include an additional provision which might give the City greater protection against University menace? Not an easy question, but worth thinking about.</p>	<p>c2. Concern over the effect of University expansion c2 Need for a masterplan</p>	<p>Consider coverage of University in Plan Consider point re masterplan</p>
<p>WC156 Comment on your post "Summary" There has been a lot of hard work out into this document, most of which is to be welcomed. However, it is largely aspirational and the difficulty will be translating these aspirations into reality. Durham is a difficult environment to work in because of its existing street plan and topography. Cycling within the city is at best only for the fit and young, and at worst downright dangerous. Most desirable housing sites have been squandered to speculative student accommodation schemes, when the real sustainable demand is for younger single people, couples and families who are income earners, together with the elderly. The only way of bringing significant traffic</p>	<p>c2. Concern over implementation</p>	<p>Consider coverage in Chapter 5</p>

<p>relief to the city centre is from an outer ring road, which has serious adverse environmental consequences. Sadly, we have a completely dysfunctional planning department and planning committee, which, since the demise of the City Council, no longer has any real commitment to Durham City, witness the staggeringly silly decision to close the very successful tourist information centre and to submit a County Plan to the Government that was fundamentally flawed from the outset.</p> <p>I wish the Planning Forum every success, but I fear without a radical change of political control and a major overhaul of our planning department, your task will be enormously difficult.</p>		
<p>WC157 Comment on your post "The Plan"</p> <p>I support this plan, which has been drafted by some very diligent and knowledgeable members of Durham City's community. Durham City has suffered great damage over several years during which there has been an unpardonable democratic deficit in the administration of the area covered by this plan, but in my view it is far better for citizens to take up and engage with the remit on offer than to say, "Too little, too late..."</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>WC166 Comment on your post "Chapter 5: Implementation and Monitoring"</p> <p>We welcome the acknowledgment, in several places in the Neighbourhood Plan, of the need to take into proper account the importance of assuring and enhancing the accessibility of the City, its services, facilities and environment, to all people, whether they be City residents, neighbours or visitors. In recent years there have been some improvements in accessibility issues, but there remain persistent problems which can be addressed and resolved. One reason why less has been achieved than is possible and desirable has been the failure to consult those people who are affected when access is not as good as it should be, or to seek professional informed advice.</p>	<p>c2. Accessibility</p>	<p>Consider coverage of accessibility in Plan</p>
<p>WC168 Comment on your post "Appendix A"</p> <p>I support all of these numbered these projects, including Project 13 North Road Regeneration. With respect to the call for the provision of public toilets--something I support--it can be noted that further up North Road, at the low end of Wharton Park, there is a toilet block in place. This has been closed for over a year 'for repairs' (though no repairs appear to have been</p>	<p>c2. Support for projects</p> <p>c2. Addition to projects</p>	<p>Noted</p> <p>Consider addition to projects</p>

<p>carried out since the closure). These toilets might usefully be reopened. On the subject of toilets, a second block of convenient and well used public toilets by the Wear, near Baths Bridge, were closed approximately 8 years ago 'due to vandalism'. These toilets too might usefully be reopened. Perhaps these things could be added to the plan?</p>		
<p>WC183 Comment on your post "Policy H1" Copied from Policy H1 This policy recognises the relevance of the WHS management's plan's Action Plan to the Neighbourhood Plan. In particular, the Action Plan's objective to improve access to and across the WHS for people with disabilities and their carers, is identified as relevant. Yet there is no recognition in the Neighbourhood Plan of the very real difficulties that will be encountered in trying to achieve this objective. Consultation with disabled people, and advice from those with expertise in the needs of people with disabilities appears to be lacking. Without that consultation and advice, the identified objectives will not be achieved.</p>	<p>c2. Concern over implementation</p>	<p>Consider coverage in Chapter 5</p>
<p>WC189 Comment on your post "Chapter 1: Foreword" The Durham City Access For All Group has considered the Plan and support the initiative it represents. Like others, we appreciate the work that has been done in preparing the Plan and in making it possible for all residents of the City to comment on its ideas and suggestions.</p>	<p>c2. Support for Plan c2. Thanks</p>	<p>Noted</p>
<p>WC200 Comment on your post "References to Evidence Base" In the appendix listing educational institutions Durham Sixth Form Centre is listed as the "Sixth Form Centre".</p>	<p>c5. Amendment to appendix</p>	<p>Consider amendment</p>
<p>WC203 Comment on your post "Appendix D: Population" Schools - no mention of Durham Sixth Form Centre which serves the the whole of County Durham and parts of Sunderland Deprivation - no mention of Gilesgate</p>	<p>c5. Amendment to text</p>	<p>Consider amendment</p>
<p>WC205 Comment on your post "Plan as pdf" The neighbourhood plan addresses the problems of living within a compact, historic city that needs to function with an expanding but transient youthful population. It suggests ways of redressing the radical alteration of the city scape and is a timely reminder that some developments can be physically intimidating</p>	<p>c2. Support for Plan</p>	<p>Noted</p>

<p>and inappropriate. I endorse the plan as a whole and particularly its approach to preserving and enhancing the network of green spaces within the neighbourhood and encouraging sensitive and sustainable housing developments for all age groups in order to create a more harmonious community.</p>		
<p>WC206 Comment on your post "Summary: Theme 4: A City with Attractive and Affordable Places to Live" Copied from Theme 4 Unfortunately, I am unable to study this lengthy proposal in any real detail. I cannot see a useful overseeable summary to help me. When the issues are so many, and so complex it becomes too difficult to do justice to the enormous efforts made by those compiling this work. I cannot take the time to get to grips with all this. So if it is any use I can tell you what I think about a few issues that effect me and my family. ... Students are often sympathetic to residents problems. Help them to join in making lives easier where ever they can. The students often don't agree with Uni policies! They have as little say as the rest of us ordinary folk. The Council is working with developers and probably some people are doing very well at the expense of the common good of the city. Who are these powerful people? Time to name them, and examine what they are doing, why, and who is benefiting! Litter is one of the biggest shameful messes this city has. A few examples: Students throw stuff on local paths in Pelaw woods on the way to Maiden Castle sports fields. Fishermen leave (often dangerous hooks/ line) rubbish along the river. Locals don't clean up the areas in front of their own houses as they see it as the work of Council - so it gets left and blown into rivers, and ends up in the trees, in fields, on verges, and of course in the sea. Residents should help to clean the city and so should students staying in our neighbourhoods. How can this be organised? Change begins at home! That's probably enough from me.</p>	<p>c2. Lack of summary</p> <p>c2. Involve students</p> <p>c2. Concern over Council and developers</p> <p>c1c. Litter outside remit (not a planning issue)</p>	<p>c2. Consider some kind of overview/ guide to hep people navigate the Plan. Note: a summary was provided</p> <p>Note: We have tried in a number of ways to obtain students' views</p> <p>Noted</p> <p>Consider covering this in a project</p>
<p>WC210 Comment on your post "Chapter 3: Vision and Objectives" It's good to see people's opinion set out in a clear and explicit fashion. The major themes stand out in the way they've been presented. It shows that the Council is good at spending capital as in the upgrading of North Road and</p>	<p>c2. Clear presentation</p> <p>c2. Need for accessibility</p>	<p>Noted</p> <p>Consider coverage of accessibility in the Plan</p>

<p>the Market Place but then fail to set aside sufficient funds for maintenance leading to environmental deterioration. I support the views of the Access Group. The Themes that have emerged from the consideration of people's vies for a good framework for future work. As a matter of interest do we have the sample size for the views?</p>	<p>c2. Sample size</p>	<p>Consider if this can be included in numerical analysis of responses</p>
<p>L7 In paragraph 4.215 there is a mistake: Lumiere is not biannual (every six months) but biennial (every two years).</p>	<p>c25. Spelling mistake</p>	<p>Correct</p>
<p>L8a The Club welcomes the thrust of the Plan and supports its themes and objectives. In particular the Club welcomes its recognition of the need to embrace sustainability and protect a truly beautiful and historic city. Moreover it also specifically supports the need for a diverse economy and an enriched community life.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>
<p>L9b Summaries of the DCC's comments are given below (as the original is many pages long). For details (which will be used in addressing their concerns) see the full response</p>		
<p>L9b SEA: Specialist officers have identified fundamental concerns about the way in which the group have undertaken the Sustainability Appraisal and Strategic Environmental Assessment that was required because of the environmental/ heritage sensitivities relating to the plan area.</p>	<p>c2. Concern over SA/SEA</p>	<p>Action agreed: Workshop with DCC officers and hopefully Historic England on 22 February 2018 Technical guidance obtained from Locality</p>
<p>L9b Effectiveness of pre consultation engagement: the county council is of the opinion that the working group has not embraced much of the advice given relating to the council's representations to this consultation. For example the council is aware that despite being addressed to the wider Forum members not all were not privy to the county council's health check findings. Rather, these were only considered by the working group, who represent only part of the Forum.</p>	<p>c2. Concern over Forum involvement</p>	<p>Note: This is a misunderstanding; the full Forum was made aware.</p>

<p>L9b Engagement: It is also evident the County Council's assets team alongside the University and Durham Business Improvement District (BiD), who are all significant stakeholders with differing interests and requirements, have not been adequately engaged in the preparation of the draft plan. This raises question marks over the delivery of parts of the plan.</p>	<p>c2. Lack of engagement</p>	<p>Note: The Assets team are within the Department consulted and represented on the Working Group by an officer of the Head of Planning and Assets. Feedback on sites were provided by DCC health checks and the Forum amended policies in the light of this. The pre-submission draft was sent to the Chief Executive with the request for it to be forwarded to all relevant sections within the Council. The University was asked in 2015 to provide a link person: the eventually named link person only attended a handful of meetings and did not make comments. The replacement link person in 2017 has fully engaged. It should also be noted that the Forum has tried to open up contact with the University via the MP, via a meeting with the VC, and via DURF. Durham BID has a representative on the Working Group who attended and contributed many times, and was the co-convenor for the Economy Theme.</p>
<p>L9b Allocations: Furthermore, it seeks to allocate land for purposes other than what it already has planning permission, and in some cases where schemes are now under construction which again conveys a negative tone about certain types of development which were previously deemed suitable by the local planning authority in the context of the existing local and national</p>	<p>C3 and C5. Re allocations</p>	<p>Consider responding that this will be discussed and hopefully resolved in the agreed officer workshops.</p>

policy framework.		
L9b Delivery Plan: Finally the county council is unconvinced that the Delivery Plan associated with the DCNP has been prepared through proper engagement with stakeholders (including itself) or any appropriate understanding of the implications involved in terms of practicalities and resources in delivering projects listed.	C3 and C5	Consider responding that this will be discussed and hopefully resolved in the agreed officer workshops.
L9b Implications upon the future sustainability of the area: as currently drafted, the DCNP conflicts with a number of policy areas as detailed above, notwithstanding the fact that it has been subject to a full Sustainability Appraisal (SA) incorporating SEA, the concerns about which are set out above. Ultimately the SA Report reads as a somewhat biased assessment which has not served to have the positive influence that it should have had on plan preparation.	C2. Concern over SA/SEA	Action agreed: workshop with DCC officers and Historic England on 8 March 2018
L9b Relationship with and implications on existing and emerging policy: the PPG makes it clear that a draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force. Also, potential conflicts should be minimised to ensure that policies in the neighbourhood plan are not overridden by a new Local Plan. Of extreme concern to the council is the emotive tone of some of the supporting text which accompanies these policies, particularly in respect to the student population and council activity. This is considered to be unnecessary and beyond the scope and spirit of a neighbourhood plan, particularly given it will sit alongside the council's development plan.	C3 and C5	Note: The DCNP clearly states that it will be brought into alignment with the CDLP as it emerges. Consider tone of text
L9b Clarity of policies: throughout the period during which the county council has offered 'support' to the Forum it has provided advice on the wording of policies and justification text. Despite this and the fact that the health checks have highlighted significant deficiencies with the phrasing of the vast majority of policies these concerns remain largely unresolved. Details are set out in an appendix.	c2: Lack of response to Council's advice	Note that the 'support' has been almost entirely advice that the wording is wrong / unacceptable / impractical without however providing any guidance on how this wording needed to be changed. It should also be noted that in many places changes were made in the

		<p>light of the DCC's health checks. This will be discussed and hopefully resolved in the agreed officer workshops. Early support from the Council was very minimal. Support much improved from October 2016 onwards.</p>
<p>L9b Effectiveness of policies: whilst the council has no objection to many of the visions and objectives of the DCNP there are instances where the county council is unconvinced that the policies work towards meeting those objectives. This in part is a consequence of the wording of policies. Details are set out in an appendix. The council is concerned that the plan, whilst setting out a number of objectives and aspirations within the supporting text in many instances the policies do not serve to fulfil some of these. Furthermore, the DCNP has missed an important opportunity to provide a suite of more focused policies that a locally specific to the neighbourhood area that would have provided greater depth and opportunity for a positive framework to help contribute to the continued sustainability of the area. As a consequence in its current form the draft plan reads as an overly restrictive policy document which poses the prospect of future stagnation to the area, which includes the city centre, a significant valuable heritage and economic asset. For example its town centre policies and proposals fail to recognise the most up to date national policy approach of planning to enhance the visitor experience to beyond that of retail. Furthermore, given deficiencies in the drafting of policies which include advocating an outdated approach to heritage matters and intent to set a higher bar than the existing adopted local and national policy on these important matters, it represents an unjustified challenge to and an upsetting of the existing balance that has been carefully struck between competing development and conservation requirements through the existing national and local policy context.</p>	<p>c3. Deficiencies in policy wording</p> <p>c2. View that the plan lacks local focus and is too restrictive</p>	<p>Addressed under each Theme</p> <p>Local focus: This will be discussed and hopefully resolved in the agreed officer workshops. Restrictive nature: Note: The policies have been written in response to the priority survey responses and have received high levels of support in the pre-submission consultation.</p>

<p>L9 Deliverability: both individually and collectively there are a number of policies proposed that place unreasonable, unequitable, conflicting, and unjustified and/ or inadequately evidenced constraints on future development proposals for the area. The overall approach in the document is considered by the council to be one of imbalanced, inflexible control which is divergent from the approach advocated within the current City of Durham Local Plan and NPPF. It is also at odds with the county council's wider emerging policy approach regarding the potential of the city in contribution the wider economic prosperity of the county.</p>	<p>c2. Undeliverable</p> <p>c2. At odds with Council's approach</p>	<p>Note: The policies have been written in response to the priority survey responses and have received high levels of support in the pre-submission consultation.</p> <p>Note: We have not yet seen this as the Council have told us, after many requests, that any information about the developing Local Plan, and any supporting evidence, can only be made available to the Forum once it is in the public domain</p>
<p>L9 Projects: PPG clearly states that wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non -land use matters should be clearly identifiable. For example, set out in a companion document or annex. Whilst the Forum has sought to include projects falling into this category in a separate appendix the council is concerned that there are a number of references to these within the supporting text relating to the planning policies. This matter needs to be addressed in order that the plan accords with the PPG in relation to this matter.</p>	<p>c4. Referencing to projects</p>	<p>Consider referencing within body of plan</p>
<p>L9 As some strategic policy approaches within the existing CDLP are non-negotiable in that they reflect NPPF content and basic planning principles, (e.g. heritage and Greenbelt), it is reasonable to presume that these would be taken forward in the forthcoming CDP. The county council is concerned that there are aspects of the DCNP that merely repeat NPPF and/ or the CDLP. The council has identified several instances where the DCNP approach deviates from and conflicts with that of the council's existing and evidence relating to emerging plans and strategies.</p>	<p>c2. Conflict with DCC's emerging plan and strategies</p>	<p>Addressed under individual themes. But note Forum response above about lack of access to the Council's emerging plan</p>
<p>L15</p>		

<p>This letter provides the response of Gladman Developments Ltd (hereafter referred to as “Gladman”) to the presubmission version of the Durham Neighbourhood Plan (DNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.</p> <p>Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.</p> <p>Through these representations, Gladman provides an analysis of the DNP and the policy decisions currently being promoted within the Plan.</p> <p>Comments made by Gladman through these representations are provided in consideration of the DNP’s ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the Planning Practice Guidance {Section ID: 41} (PPG).</p> <p>Legal requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the DNP must meet are as follows:</p> <p>a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</p> <p>d) The making of the order contributes to the achievement of sustainable development.</p> <p>e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</p>	<p>c2. Statement about legal situation for NPs</p>	<p>Noted</p>
--	--	--------------

<p><u>National Planning Policy Framework</u></p> <p>The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it provides guidance on the requirement for the preparation of neighbourhood plans to be in general conformity with the strategic priorities for the wider area and defines the role which neighbourhood plans can play in delivering sustainable development.</p> <p>At the heart of the Framework, is a “<i>presumption in favour of sustainable development</i>” which, as outlined in paragraph 14, should be seen as a golden thread running through both plan-making and decision taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet Objectively Assessed Needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.</p> <p>Paragraph 16 of the Framework makes clear that the presumption in favour has implications for how communities engage in neighbourhood planning, stating that neighbourhoods should;</p> <ul style="list-style-type: none"> ■ “Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; ■ Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and ■ Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed. “ <p>Furthermore, paragraph 17 sets out that neighbourhood plans should define a succinct and positive vision for the future of the area and that neighbourhood plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. In addition, neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Further guidance for groups involved with the production of neighbourhood</p>		
--	--	--

<p>plans is specified at paragraph 184;</p> <p>“Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”</p> <p>This makes clear that the ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider area as confirmed in the adopted Development Plan. It is therefore important that sufficient flexibility is included within the Plan so that it is able to respond positively to changing circumstances which can arise through the preparation of any future emerging Local Plan.</p> <p><u>Planning Practice Guidance</u></p> <p>It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider areas, as confirmed in an adopted Development Plan. The requirements set out in the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG). On the 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these updated a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>This guidance is intended to ensure that emerging evidence of housing need is addressed, to in turn help to minimise any potential conflicts which can arise and ensure that policies are not overridden by a new Local Plan or subsequent Site Allocations Local Plan.</p> <p>On the 19th May 2016, the SoS published a further set of updates to the</p>		
---	--	--

<p>neighbourhood planning chapter of the PPG. {Paragraph: 084 Reference ID: 41-084-20160519 (Revised 19/05 2016)} The update also emphasised that; “... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.” {Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).} Accordingly, the DNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic condition (a).</p> <p>Relationship to Local Plan <u>Adopted Development Plan</u> The current Development Plan for County Durham is contained in the relevant ‘saved policies’ of the Local Plans prepared by each of the former District and Borough Councils’. The adopted Development Plan was prepared in accordance with a previous era in national planning policy and guidance. The Framework now requires Local Planning Authorities to prepare assessments for the relevant housing market and land availability. Given that the Development Plan for the neighbourhood plan area is out of date and time expired it is important that the Plan allows for sufficient flexibility so that it is not ultimately superseded by a new Local Plan as s38(5) of the Planning and Compulsory Purchase Act 2004 states that: ‘if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).’</p> <p>Durham Neighbourhood Plan <u>Context</u> This section highlights the key issues that Gladman would like to raise with regards to the content of the DNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance. In this regard, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.</p> <p>Conclusions</p>	<p>c3. Changes to policies</p>	<p>Consider under individual Themes</p>
--	--------------------------------	---

<p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the DNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area. Gladman is concerned that the plan in its current form does not comply with basic conditions. Accordingly, the Parish Council should consider the issues raised in these representations and ensure that the policies which do not comply with national policy and guidance are amended to ensure the Plan can be found in conformity with basic conditions.</p> <p>Gladman hopes you have found these representations helpful and constructive and would welcome the ability to assist in the Steering Group in preparing the neighbourhood plan prior to its submission under Regulation 15.</p>	<p>c2. Concern that plan does not comply with basic conditions</p> <p>c2. Offer of involvement</p>	<p>Consider final health check</p> <p>Consider involvement</p>
<p>L16 Strategic Environmental Assessment / Sustainability Appraisal I am pleased that most of our previous comments (dated 14 July 2017) on the Scoping Report have been addressed, yet there remain concerns. I am broadly happy with the probing questions you identified in the final Scoping Report, but their application and the options identified are problematic. This is of concern, not least because the issue of the historic environment was a key trigger for the need for SEA. Your SEA process for heritage is based on an option which is of concern: option (b) is to make more “prescriptive” and “stringent” policies than existing higher level policies. This is unlikely to be acceptable because, as has been set out above, policies which are more stringent than existing higher level policy mean the plan is unlikely to be in accordance with the NPPF. Rather than in the degree of prescription your policies provide, options should be found in the detail of how higher level policy is applied. Neighbourhood planning is about adding local detailed policy in a way which tackles issues found in the evidence gathered. SEA ensures these will meet the sustainability objectives identified. I am concerned that the premise for the assessment itself is therefore flawed in identifying and choosing an inappropriate option. I am also concerned that</p>	<p>c2. Concern over SA/SEA</p>	<p>Action agreed: Workshop with DCC officers and hopefully Historic England on 22 February 2018 Technical guidance obtained from Locality</p>

<p>the assessment process does not appear to have identified any adverse impacts from the plan's policies, which on the face of it appears unlikely. As a result, this means that mitigation (referred to in your report as fine-tuning) appears weak. This is apparent in Policy H4 which the SEA report says was introduced as a result of SEA fine-tuning; as set out above this policy is weak.</p> <p>I hope that measures can be taken to amend the plan and the SEA, including as set out above, before it is submitted to the Council. I look forward to the next steps of the process and would be happy to contribute further as you move forward.</p>		
<p>L20 An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>	c2. No issues	Noted
<p>L21 SEA Natural England has no further comments to make on the SEA.</p>	c2. No further SEA comments	Noted
<p>L23 The Nevilles Cross Community Association Planning Sub-group has reviewed the NPF Plan and reports as follows: 1. Overview The group welcome the Plan which represents for the first time an initial holistic vision for Durham City and those policies intended to deliver that vision. It does so from the perspective of those who live and work here. In this spirit the group supports the Plan and most of its policy recommendations but also raises a number of general comments (A) and a number relating to specific themes (B) that reflect our views and concerns which may – or may not - add to the revision of the Plan without detracting from its overall focus. In terms of our general views and concerns about the whole approach taken in the Plan, we recognise that the Plan is a planning document. As</p>	c2. Support for Plan	Noted

<p>entrepreneurial hub, a city that puts residents at the centre, or an expanding campus City? This is never explicit in the draft and is critical to its progress. While it may be that the future of the City may combine components of each, the primary focus will influence the acceptability, relevance and prioritisation of the recommended policies of the Plan. Second, there is a conspicuous absence of a full assessment of the University's ambitions and master plan which, it may be argued, is the single defining issue that could enhance the City's development as an entrepreneurial hub or, more likely and by default, turn Durham into a campus city. If the latter, in terms of its impact on housing, retail, cultural, infrastructural and other aspects, then the achievement of many of the Plan's ambitions for Durham could be diluted or inhibited.</p>		
<p>Both are current realities which need to be recognised if the Plan is to become the basis of a strategic, realisable and prioritised approach. As examples, proposals for a museum and art galleries in Durham have to take into account DCC's financial priorities which prompted earlier closure of the DLI museum and the move of the tourist office to Peterlee which may be seen as evidence that the DCC does not see Durham as a tourist or cultural destination. By extension what evidence is put forward that it would be likely to support delivery of enhancing features it has already voted against?</p>	<p>c2. Reality of implementation</p>	<p>Consider coverage in Chapter 5</p>
<p>Second, the University's proposed increase in numbers is – and will – have significant impact on the physical, infrastructural and facilities appearance and shape of the City. The knock-on effect on the availability of residential accommodation will decrease the demonstration of demand for recreational, retail, cultural restaurant and other facilities that residents would reasonably demand and welcome. This could also adversely impact on the appearance of the City as well as those facilities attractive to tourists. Once that quantum is reached, no amount of intent will lead to delivery of a number of the Plan's recommendations. In our view this would be contrary to the explicit aim of the NPPF as generally outlined in para 14 and given additional detailed weight in para 17; this should be addressed in the Plan's chapters and themes.</p> <p>Thus we would argue that this section does not reflect the current fundamental or structural changes to the City which are likely to have a significant impact on the delivery of the Plan's vision. We would welcome a</p>	<p>c2. Effect of increased student numbers</p>	<p>Consider coverage in plan</p>

<p>separate chapter or theme that spells out and reviews explicitly where we are in terms of current retail, accommodation, cultural, recreational and other provision, why we are where we are (especially in terms of DCC and University approaches), and what needs to be done to facilitate the Plan. We consider that the Plan must influence, rather than be influenced by, those approaches so that its vision can be protected against dilution by others' agendas.</p> <p>3. Chapter 3</p> <p>The approach proposed in 2. would allow a much sharper focus on what needs to be done to achieve the stated vision. It is clear from the responses that the primary wishes for residents would be to see, under 3.5, the City both as a tourist and cultural destination and a residents' city. This can only be achieved through, under 3.6, policies that promote the City as such and, crucially, safeguard its residential base that would provide the quantum to justify the need for or demand for a number of the themes' objectives.</p> <p>This is described widely in the NPPF at paras 69-78 in its pursuit of Promoting Healthy Communities. As suggested above, this could usefully be used as a framework for a chapter or theme that discusses the impact to date of various approaches and agendas that have mitigated against delivering the NPPF and what should be done to align the Plan with the objectives of the NPPF. In particular it is essential that the Plan and DCC and the University address the question of the expansion of University numbers, or at least managed expansion of numbers, to facilitate the Plan's objectives and action plans that deliver the vision. This is discussed in detail in the next section.</p>		
<p>L25</p> <p>General Comments on the City of Durham Neighbourhood Plan</p> <p>Persimmon Homes commend the significant work that has been undertaken to date by the Durham City Neighbourhood Planning Forum and particularly welcome the provision and content of the Durham City Neighbourhood Planning Forum website which provides an excellent resource in helping to understand the community consultation exercises which have been undertaken and ensuring transparency.</p> <p>Persimmon Homes' primary concern around the Neighbourhood Plan centres upon ensuring that future development sites do not become subject</p>	<p>c2. Praise for website</p>	<p>Noted</p> <p>Consider under individual themes</p>

<p>to such a scale of obligations and policy burdens that their ability to be developed viably is threatened and thus the ability for Durham City to grow sustainably is constrained.</p> <p>Concluding comments Persimmon Homes fully supports the perpetration of a Neighbourhood Plan for Durham City that fully accords with the principles of the NPPF and plan positively for the sustainable growth of the City. As a key stakeholder in the future development of Durham City we would welcome the opportunity to engage and assist in the formulation of the Durham City Neighbourhood Plan.</p>	<p>c2. Offer of involvement</p>	<p>Consider involvement</p>
<p>L27 On behalf of Empty Shop CIC I am pleased to place on record our support for the Neighbourhood Planning Forum's draft plan. We are supportive of the vast majority of the policies, the overall objectives and the thematic areas contained within the plan. As a Community Interest Company with a focus on regeneration through adaptive reuse we particularly welcome the commitment throughout to a rich community life that places heritage, culture and town-centre appropriate business at the heart of the neighbourhood. Attempts through policy to create a more balanced economic and residential make-up are much needed in the continued absence of the County Durham plan.</p>	<p>c2. Support for Plan</p>	<p>Noted</p>