

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

**Theme 3 - A City With a Diverse and Resilient Economy**

**20 August 2019**

The comments have unique codes as follows:

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

However, no personal details have been provided.

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

- L5 = Durham County Council
  - L5b = Durham County Council Appendix
- L6 = Durham University
  - L6a = Durham University Response
- L8 = Historic England
  - L8a = Historic England, Letter on Plan
- L11 = Northumbrian Water
- L12 = Resident1
- L17 = Southlands Management Ltd
- L18 = WHS Coordinator

The codes for categorising the comments are as follows:

- c1: outside the remit of the neighbourhood plan
  - c1a: outside the Plan area
  - c1b: planning issue that has to be dealt with by the Council or by other bodies not by a neighbourhood plan
  - c1c: not a planning issue
- c2: a generic style comment of praise, blame, opinion etc not requiring a response just an acknowledgement
- c3: suggesting changes to the policies
- c4: suggesting input into initiatives in 'Looking Forwards'
- c5: suggesting changes to the other text of the Plan

**THEME 3**

<b>COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT</b>	<b>CATEGORISATION</b>	<b>PLANNING ISSUE OR ACTION IDENTIFIED</b>
<b>COMMENTS RELEVANT TO THEME 3</b>		
<b>SEQ2:</b> The High Street is pretty dead, no BHS no M&S, no reason really to shop in Durham. {Work/run business}	c2 Re: retail offer	Concern noted. No action
<b>L12</b> Resident1 {parts copied to Themes 3,4,6, Comments} 4.145: The statement that “support will be given to any development that contributes to the evening economy” is a real hostage to fortune. Lap dancing anyone?	c5 re: Policy E4 evening economy	Amend text of policy so it is not open to misinterpretation.  Comment considered. Text amendment
<b>SQ2</b> {Parts copied to Themes 3,5,6} I disagree with knocking down County Hall and moving council offices to Sands. {No 'your details' given}	c2 Objection to policy E1:1 re -new siting of County Hall	NPPF paragraph 81 states that planning policies should <i>identify strategic sites</i> . The County Hall site is needed for a business park to improve the economy of Our Neighbourhood as evidenced in the policy justification  Objection to Policy E1:1 noted. No action.
<b>SQ2 /cont (i)</b> I think Durham is too small a city for any further developments eg at Aykley Heads. {No 'your details' given}	c2 Objection to policy E1:1 because of the size of Durham City	NPPF paragraph 81 states that planning policies should <i>identify strategic sites</i> . The County Hall site is needed for a business park to uphold and improve the economy of Our Neighbourhood as evidenced in the policy justification  Objection to Policy E1:1 noted.

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		No action
<p><b>SQ9</b>                      {Parts copied to Themes 2a, 2b,3}                      Keep Durham tidy and crime free. {Visitor DH9}</p>	<p>c1c re – Crime and untidiness of City</p>	<p>Concerns addressed in Looking Forwards document– Initiative 9</p> <p>Comment noted.</p>
<p><b>SQ10</b>                      Parts copied to Theme 1, 2b,3,4,Comments}                      Policy E1: I think the development of Aykley Heads as a business park does make sense. {Resident DH1}</p>	<p>c2 Support for policy E1: 1 Larger Employment Sites – The Aykley Heads Business Park</p>	<p>Support noted. No action</p>
<p><b>SQ10 /cont (i)</b>                      Policy E3. + {plus} strong policies to deter more edge of town retail. {Resident DH1}</p>	<p>Support for policy E3: Retail Development</p> <p>c1b – Edge of town retail</p>	<p>Edge of town retail is outside the Parish Council/Neighbourhood Plan area and therefore is a planning issue to be dealt with by Durham County Council</p> <p>Support noted. No action</p>
<p><b>SQ14</b>                      {Parts copied to Themes 1,3,4}                      E4: <u>Already</u> too much 'evening' economy &amp; its dire consequences for families &amp; impact on Council cleaning teams. {Resident DH1}</p>	<p>c2 Objection to policy E4 Evening Economy</p>	<p>Refuse and cleaning are not a planning considerations and outside the remit of the NP. However Looking Forwards document Initiative 2: Clean Durham addresses this issue.</p> <p>Objection noted. No action.</p>

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<p><b>SQ16</b>            {Parts copied to Themes 3,6, Comments}            Safety in City if night time economy expanding needs to be acknowledged. Accessibility in Durham City centre needs to be given more attention, e.g. no disabled toilets after hours. {Work / run business &amp; student DH1}</p>	c3 Re: Policy E4- Evening economy	<p>Consider amendment to text to include public safety</p> <p>Accessibility issues addressed in policy E3 h) and Looking Forwards Initiative 9 and Initiative 15</p> <p>Comment considered. Text amendment</p>
<p><b>SQ20</b>            {Parts copied to Themes 3,5,6}            E3: Not seen. {Resident DH1}</p>	???	
<p><b>SQ20 /cont (i)</b>            E5: Not seen. {Resident DH1}</p>	??????	
<p><b>SQ23</b>            {Parts copied to Themes 2a,2b,3,4,5}            E4. No more bars! {Resident DH1}</p>	c1b Re: too many bars in the City	<p>Drinking establishments are subject to planning control for permission as an A3 or A4 use. A blanket ban is not allowed under planning legislation, but Neighbourhood Plan policy E4.2 only permits non A1 uses if they will add to the vitality and viability of the City centre.</p> <p>Concern noted. No change.</p>
<p><b>L18</b>            WHS Co ordinator            {parts copied to Themes 1,2a,2b,3,4,5, Comments}  <b>Theme 3: A City with a Diverse and Resilient Economy</b></p>	c2 Support for Policy E3- Retail	Evidence suggests that the use of

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<p><b>Policy E3: Retail Development</b>  <b>Policy E4: Evening Economy</b>  A strong and resilient central retail core is essential to the active conservation of the important historic streets that form the visitor's approach to the WHS. A flexible city centre that copes with change in retail patterns and store closures is vital in presenting an attractive City to both local people and visitors. The encouragement of evening economy is useful but this, as with other conversions of upper storeys and changes of use, has been causing some negative impact from development pressure on buildings lining the historic routes. The conditions under Policy E3 are useful in helping guide these changes.</p>	with concern re use of upper floors for residential use, and E4 Evening economy	<p>upper floors of retail premises for accommodation adds to the vibrancy of a town centre. The DCNP must be read as a whole and Policy E3 e) together with Policy H1 should prevent any development from having a negative impact on the historic environment and WHS.</p> <p>Support noted. No action</p>
<p><b>L18 /cont (i)</b>  <b>Policy E6: Visitor accommodation</b>  Encouragement of sensitive visitor provision will help support the WHS.</p>	c2 Support for policy E6	Support noted. No action
<p><b>SEM1</b>  {parts copied to Themes 2b,3,4}  I would encourage residential development above retail with the except of above A4 and A5 use classes.</p>	c2 Support for policy E3 d) with some concern	<p>Consider amend policy text Policy E3 d) and the impact on residents amenity by allowing accommodation above Use classes A4 Drinking establishments &amp; Class A5 Hot Food Takeaways.</p> <p>Support noted.</p> <p>Comment considered. Text amendment</p>
<p><b>SEM1 /cont (i)</b>  ... would seek liberalisation of building in the green belt - green belt policy seems to have been written by home owners to prevent others getting on the property ladder. For Durham to thrive we need more industry and more housing to do so we need to build up or out</p>	<p>c2 Re: development in the green belt</p> <p>c1a Re: reuse of commercial property</p>	<p>The County Council's proposed releases of Green Belt land for housing development lie outside the Neighbourhood Plan area.  Comment noted. No action</p> <p>Outside the Neighbourhood Plan</p>

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<p>Redundant retail on edges of business district to allow conversion to Residential use</p>		<p>Area. Out of town retail areas are the responsibility of Durham County Council</p> <p>Comment noted. No action</p>
<p><b>SEM3</b> {Parts copied to Themes 1,2a,2b,3,6,Comments) 2. It would be very useful to gain some feeling for the long term trends in economic growth within the Neighbourhood over the past 20-30 years. I suspect there has been a decline in the economy of the city, visitor footfall, as well as the resident population. I have concerns around the term sustainable growth as growth is not a sustainable concept and, if we are already in decline, then economic stability may be a better aspiration. What could be the population and economic climate required for a long term sustainable city? My experience of the new student developments is that they primarily shop on line, so provide no benefit to the surrounding retail offer (a notable case being the now closed Newsagent on Neville's Cross Bank), more needs to be done to promote shopping locally. I am also aware that many students and visitors appreciate the "Harry Potter" history of the city and not simply the cathedral heritage. There is very little made of this, but you only need to spend time at King's Cross Station to see how much could be made from his popularity.</p>	<p>c2 Comment regarding Theme 3 economy</p> <p>c1c – comment promoting 'shop local'</p> <p>c2 comment regarding Policy E5 Visitor Attractions</p>	<p>The term 'sustainable growth' is used in paragraph 81 of NPPF Policy E3 b) encourages a diversity of shops within the core retail area including independents.</p> <p>Shop local is addressed in Looking Forwards Initiative 19.</p> <p>This and other promotional ideas are very welcome though not the subject for a planning policy.</p> <p>Comment noted. No action.</p>
<p><b>SEM3 /cont (i)</b> 4. Further, there are plans included showing the areas identified for commercial and industry such as Aykley Heads, however, there does not appear to be any discussion around how these new areas of footfall can be linked to the existing city and retail offers to boost the economy. How can we maximise the benefit of the Aykley Heads development to the city economy? How will the additional traffic be managed?</p>	<p>c2 re: Policy E1:1 traffic management</p>	<p>Policy E1:1 requirement of master plan point d) refers to travel to and from Aykley Heads site.</p> <p>Comment noted. No action</p> <p>Consider text revision to refer to better pedestrian connectivity from Aykley Heads site to city.</p>

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		Comment considered. Text amendment
<p><b>SEM3 /cont (ii)</b>  6. Lastly, a big bug bear of mine is the lack of amenity for children within the city centre. A neighbourhood plan should support the needs of all ages within the community and there is nothing for children to do in Durham, this is a big business opportunity for the city and should also attract visitors and families from outside of the city. Cinemas are not the only form of family entertainment! It would be lovely to see our teenagers catered for and provided with something positive within the city.</p>	c2/c3 re: Policy E4 Evening Economy	Policy E3 & E4 explanatory paragraph 4.145 acknowledges the need for a wider range of entertainment to appeal to all ages  Policy E4 - Consider revision of policy text  Comment considered. Text amendment
<p><b>SEM9</b>  {parts copied to Themes 2a,3,4,5,Comments}  <b>The Night-Time Economy</b>  The tendency to favour such developments should be reversed - and quickly - before the City centre is denuded of all but bars and clubs. Retail has been subverted and this is having a negative impact on residents - who seem to feature only marginally in planning considerations. The health-related arguments against alcohol are powerful and should be heeded.</p>	c2 & c1b -comment regarding Policy E4 Evening Economy	Drinking establishments are subject to planning control for permission as an A3 Food & Drink or A4 Drinking Establishments use. A blanket ban is not allowed under planning legislation, but Neighbourhood Plan policy E4.2 only permits non A1 uses if they will add to the vitality and viability of the City centre.  Comment noted. No change.
<p><b>SEM9 /cont (i)</b>  <b>Retail offering</b>  While the City cannot be immune to wider pressures on the way in which people shop it must be recalled that not everyone has access to personal transport, or finds it easy or acceptable to use out of town</p>	c1b – re: car parking, retail mix and out-of-town shopping	Out-of-town shopping cannot be considered by the Neighbourhood Plan as the competing sites are outside the Plan area.

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<p>shopping centres. The lesson already exists locally in the serious damage caused to Bishop Auckland town centre through the rapid and considerable development of out-of-town shopping facilities.</p> <p>A revised car parking policy to encourage local people to shop locally would be of help. The new development of the Prince Bishops shopping centre - Riverwalk - was sold partly on the idea of additional retail provision. This does not seem to have materialised and new space seems to be confined to food and entertainment outlets. What happened to the promised shops?</p>		<p>Management of on-street car parking and existing car parks is not a planning matter but the responsibility of the highways authority, Durham County Council, to address. Policy E3 and E4 explanatory paragraph 4.145 and justification 4.148 refer to the need for longer Park and Ride opening hours to assist car parking in the city. As do Initiatives 9 and 14 in Looking Forwards.</p> <p>Comment noted. No change.</p>
<p><b>SEM15</b> This is my formal response: I've shared this with the Economy Theme convenor. The wording of the Economy policies (Theme 3) lack the words 'and' / 'or' (as applicable) linking the listed criteria.</p>	c3 – changes to all Theme 3 policy wording	<p>Revisions to policy wording requested to all policies to include the words 'and' 'or' to clarify the meaning of the policies</p> <p>Comment considered. Text amendment</p>
<p><b>SEM16</b> {parts copied to Themes 1,2b,3,4,5, Comments} <b>The Climate Crisis and the Neighbourhood Plan</b> Recent and growing concern about the climate crisis and the need for rapid transition to a low carbon economy suggests that neighbourhood plans will increasingly be judged by their effectiveness in these matters. Our Plan has been successful in doing this, but could benefit from more direct evidence that it is formative part of the development of the Plan. Here are some suggestions for changes in presentation to bring these</p>		

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<p>concerns into a clearer focus.</p> <p>...</p> <p><b>Theme 3: A City with a Diverse and Resilient Economy</b></p> <p>Perhaps inclusion of reference to a low carbon economy and eco-tourism in the objectives and a para on what this means in the context section?</p>	c5 – Comment regarding changes to objectives and context paragraphs	<p>The DCNP must be read as whole, and this point is covered in Theme 1, specifically paragraph 4.19.</p> <p>Comment noted. No change</p>
<p><b>SQ25</b></p> <p>{parts copied to Themes 2a,3,4}</p> <p>Theme 3: The dependence on the University as a major part of the economy must be addressed. Investment needs to be made to encourage a balanced more harmonious County that benefits residents. The City is increasingly becoming a campus and affordable housing a rarity for young professionals. {Resident}</p>	c2 – re: economic dependence on Durham University	<p>Policy E1:1 and E2 address these concerns by bringing forward sites for commercial premises to encourage diverse employment.</p> <p>Comment noted. No change</p>
<p><b>SQ26</b></p> <p>{parts copied to Themes 3,4,5, Comments}</p> <p>Policy E2: Providence Row: development here should be reserved for education use connected with the 6th Form Centre. {Resident DH1}</p>	c2/3 – re: Policy E2 Providence Row	<p>Amend policy text to include education and broaden use for Providence Row site</p> <p>Comment considered. Amendment of text</p>
<p><b>SQ28</b></p> <p>{parts copied to Themes 3,4}</p> <p>E2/E6 - The focus should be on providing non-student residential accommodation not retail opportunities. {Resident DH1}</p>	c2 – re: use of upper floors of retail premises for accommodation	<p>Policy E3 d) refers to repurpose of upper floors of retail premises as accommodation</p> <p>Comment noted. No change</p>
<p><b>SQ32</b></p> <p>{parts copied to Themes 3,4}</p> <p>Not too eager on visitor attractions when they interfere with regular city events like market. {resident DH1}</p>	c2 – re: temporary visitor attractions and development of employment sites in the city.	<p>Striking the balance is important and is provided for in Policy E5 (a).</p> <p>Comment noted. No action</p>
<p><b>SQ32 /cont (i)</b></p>	c5 – re: Policy E1 & E2	Refers to a concern about the size

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<p>Also have reservations on E1 &amp; E2 as Durham is really a <u>small</u> city and this aspect of development should not be allowed to dominate. Policy E2 I partially agree Query. {resident DH1}</p>		<p>of the City and the proposed commercial developments. Policy E1 is a refinement of Submitted County Plan Policy 3 and the principle for Aykley Heads is long-established.</p> <p>Comment noted. No action.</p>
<p><b>L11</b> Northumbrian water {parts copied to Themes 1,2b,3,4,Comments} We encourage all policies to adopt the principles of sustainable drainage and water management in order to support climate change, resilience and minimise flood risk. These principles should be applied to the economic development policies particularly for the 2 major strategic allocations of Aykley Heads and Durham Science Park at Mount Joy which total nearly 15 hectares of development opportunity. T</p>	c3 – re: Policy E1	<p>The comment suggests the inclusion of references to sustainable drainage and water management. The Plan must be read as a whole, and this point is covered in Theme 1.</p> <p>Comment noted. No change.</p>
<p><b>L17</b> {parts copied to Theme1,2a,2b,3,4,Comments} We respond on behalf of our client Southlands Management Ltd who are property owners in the City. ... <b>Theme 3</b> We note that Policy E3 has been expanded to include the requirements of former policy E4 from the previous draft Neighbourhood Plan. In addition, we also recognise that the Core Retail Area and Primary Frontage in Proposals Map 6 has been revised following earlier comments submitted by our client. The changes to Map 6 are broadly welcomed. ...There appears to have been substantial changes to Policy E3 which</p>	<p>c2 Support for Policy E3 – support noted</p> <p>c3 –Policy E3</p>	<p>The comment identifies a possible conflict within the policy text referring to Use Classes on ground floors and upper floors. Consider revision of text to clearly state the Use Classes permitted for ground floor and upper floors.</p> <p>Comment considered. Text</p>

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<p>details the requirements for development within the Core Retail Area. Notably, the policy goes further than the previous draft by stating (at sub point a) that A1 (retail) should be the predominant use whereas in the previous draft, this related to the primary retail frontage area only.</p> <p>...Sub points c and d then proceed to identify the uses which will be permitted on ground floors and upper floors within the Primary Frontage. As set out in sub point c, entertainment; arts, culture and tourism; and leisure, sport and recreation are the only non-A1 uses that would be permitted on ground floors. Sub point d sets out that A1, A2, A3, A4, A5 and other uses will be supported on upper floors.</p> <p>...We consider this approach to be overly prescriptive and not justified. We would also query the practicalities of only permitting these uses on the upper floors. As explained in our earlier responses, we consider that greater value should be given to the role of mixed offers – eg. A1, A2 and A3 – and Policy E3 could be harmful if they are overly restrictive. Indeed, the food and drink sector plays an important role in the vitality and viability of Durham City Centre, adding to the diversity of uses, supporting increased dwell time and having a positive impact on economic activity.</p>		<p>amendment</p>
<p><b>L17 /cont (i)</b>  ...Policy E4 is a new policy which supports development that positively contributes to the evening economy. Whilst we welcome this addition, as explained above, a wide range of use classes are also needed to support the offer of the city centre during the day time hours.</p>	<p>c2 – support for Policy E4</p>	<p>Further definition needed for this policy. Consider revision of text to clearly state types of development permitted</p> <p>Support noted.  Comment considered. Text amendment</p>
<p><b>L8a</b>  Historic England  {parts copied to Themes 1,2a,2b,3,4, Comments}  <b>Elsewhere in the plan</b>, ... I welcome the thrust of <b>Policy E3</b>, although clauses (e) and (f) may need cross-checking with the wording of H policies above.</p>	<p>c2- support for Policy E3</p>	<p>The DCNP must be read as a whole and this point is covered by policies in Theme 2a Heritage; in particular Policy H2 a) &amp; b) &amp; H4 a) safeguard retail development within the setting of the WHS. Refer to these in policy</p>

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		text.  Comment considered. Text amendment
<p><b>L5b</b> Durham County Council {parts copied to all Themes, Comments} <b>Theme 4 {actually Theme 3} General LPA Comment</b> 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? <b>Suggested Action</b> The interplay between policy S2 &amp; E1 needs to be reviewed.</p>	c2 – re: student accommodation	<p>This sentence is a carryover from earlier Durham University expansion plans and the paragraph will now be deleted.</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (i)</b> <b>E1 LPA Comment</b> 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>	c2 – re: Policy E1 reference to a masterplan	<p>The DCNP must be read as a whole and sustainability is set out in Theme 1: A City with a Sustainable Future</p> <p>The term <i>masterplan</i> appears in the glossary of terms in the NPPF February 2019 under Design Code. It states; <i>Design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written component of the code should build upon a design vision, such as a <u>masterplan</u> or other design and development framework for a site or area.</i></p> <p>Comment noted. No action</p>

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<p><b>L5b /cont (ii)</b>  <b>E1 LPA Comment</b>  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>c2 – re: Policy E1 referring to strategic sites</p>	<p>The CDP is emerging and the DCNP is adding appropriate finer-grain to both sites as defined in objective 2 in the introduction to Theme 3</p> <p>The Mount Joy site is not referred to as 'strategic' in the DCNP. It is available for development by the university and is being developed by the university therefore should be included in the DCNP</p> <p>Comment noted.No action.</p>
<p><b>L5b /cont (iii)</b>  <b>E1 LPA Comment</b>  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>c2 – re: Policy E1 - Larger Employment sites referring to detail</p>	<p>More local detail needed to expand these policies. Consider revision of text to add finer detail.</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (iv)</b>  <b>E1 LPA Comment</b>  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>c2 – Policy E1 evidence</p>	<p>The text already makes clear that these are the only two large highest quality sites in Our Neighbourhood; the Submitted County Durham Plan and Evidence Base evidences this.</p> <p>Comment noted. No action</p>
<p><b>L5b /cont (v)</b>  <b>E1 LPA Comment</b>  Criterion b: It is not sufficiently clear as to what 'creating harmony'</p>	<p>c2 – re: Policy E1 text</p>	<p>Concern regarding subjective wording.</p>

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means.		Comment considered. Amend text
<p><b>L5b /cont (vi)</b>  <b>E1 LPA Comment</b>            Criterion c: This is addressed in the CDP and therefore constitutes unnecessary repetition.</p>	c2 – re: the inclusion of Policy E1 in the DCNP	<p>Concern expressed regarding duplication of this policy as it a repetition of Policy 3 in the emerging CDP. This is an important principle and worth repeating.</p> <p>Comment noted. No change.</p>
<p><b>L5b /cont (vii)</b>  <b>E1 LPA Comment</b>            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>	c2 – Policy E1 text	<p>Concern expressed about aspiration to continuously reduce the impact of travel to these sites. This is an important principle, worth repeating.</p> <p>Comment noted. No change.</p>
<p><b>L5b /cont (viii)</b>  <b>E2 LPA Comment</b>            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>	c2 – Policy E2 text	<p>Concern regarding clarification of scope of policy Consider revision to the text to make the intention of the policy clearer.</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (ix)</b>  <b>E2 LPA Comment</b>            The final paragraph is very open ended, the result could be unintended development.</p>	c2- Policy E2 text	<p>Concern regarding text wording which could be open to misinterpretation. The DCNP needs to be read as a whole and other policies within it will ensure that inappropriate development is not allowed.</p> <p>Comment noted. No change</p>

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<p><b>L5b /cont (x)</b>  <b>E2 LPA Comment</b>            The uses cited for Fowlers yard are considered to be too restrictive and this approach does not accord with NPPF in this regard.</p>	c2 – Policy E2:2 text	<p>Concern about the restrictive Use classes for Fowlers Yard. This policy builds on and enhances the current uses at Fowlers Yard and is in keeping with the objective of a DCNP to add finer detail.</p> <p>Comment noted. No change.</p>
<p><b>L5b /cont (xi)</b>  <b>E2 LPA Comment</b>            It is understood that there are unresolved issues regarding the Blagdon Depot, Frankland 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>	c2- Policy E2:3 re inclusion of site	<p>The issues regarding this site were concerns about the Green Belt and flooding issues, both of which are addressed in the policy text.</p> <p>Comment noted. No change</p>
<p><b>L5b /cont (xii)</b>  <b>E2 LPA Comment</b>            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>	c2 Policy E2 – revision of map	<p>Clearer definition of employment sites on Map 5 to define the correct site of the Old Sorting Office</p> <p>Comment considered. Revision of map - Roger</p>
<p><b>L5b /cont (xiii)</b>  <b>E3 LPA Comment</b>            There appears to be a tension between Policy E3 &amp; E4 regarding the issue of any uses, which do not improve cultural diversity and offer.</p>	c2 – Policy E3 & E4 text	<p>The request for clarification for both policies to enhance the city centre economy including Use Classes for Policy E3</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (xiv)</b>  <b>E3 LPA Comment</b>            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>	c2 – Policy E3 re: inclusion of policy	<p>Concern regarding duplication of policy in emerging CDP. Retail development is vital to Durham City and bears repetition and therefore is a necessary inclusion in the DCNP</p>

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	CATEGORISATION	PLANNING ISSUE OR ACTION IDENTIFIED
<p><b>L5b /cont (xv)</b>  <b>E3 LPA Comment</b>            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>	c2 – Policy E3 text	<p>Comment noted. No change</p> <p>Concern regarding aspirational text to be moved to supporting text from policy. E3 b) consider moving the text to supporting text.            c) consider revising text to tighten up the Use Classes</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (xvi)</b>  <b>E3 LPA Comment</b>            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>	c2 – Policy E3 text	<p>Clearer definition of policy objective requested. Consider revision, combining text, to make intent of policy clearer.</p> <p>Comment considered. Text amended</p>
<p><b>L5b /cont (xvii)</b>  <b>E4 LPA Comment</b>            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 omits the aspect of public safety.</p>	c2 – Policy E4 inclusion of policy, & text	<p>Concern regarding duplication of Policy 10 Evening Economy from the emerging CDP.            Also a need to address aspects of public safety Policy E4. Consider revision of policy text and include reference to public safety            Comment considered. Text amendment</p>
<p><b>L5b /cont (xviii)</b>  <b>E5 LPA Comment</b>            The policy will be difficult to apply to existing attractions and misses opportunities to manage development of existing sites as criteria c, d &amp; e could only be relevant in the main to new attractions.  <b>Suggested Action</b>            Further criteria may be necessary regarding existing sites, or the scope</p>	c2 – Policy E5 text	<p>Concern that policy doesn't relate to existing attractions.            Consider revision of policy text to include finer detail relating to existing attractions.</p> <p>Comment considered. Text amendment</p>

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	CATEGORISATION	PLANNING ISSUE OR ACTION IDENTIFIED
of the policy changed. Splitting criteria as per approach in Policy C1 would assist.		
<p><b>L5b /cont (xix)</b>  <b>E5 LPA Comment</b>  The policy is too prescriptive, it is not clear if all or just some of the criteria would need to be met.</p>	c2 – Policy E5 text	<p>Concern that policy is too prescriptive. Consider revision of text above criteria to make the intention clearer</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (xx)</b>  <b>E6 LPA Comment</b>  The policy will be difficult to apply to existing accommodation and misses opportunities to manage development of existing sites as criteria c, d &amp; e could only be relevant in the main to new accommodation.  <b>Suggested Action</b>  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.</p>	c2 – Policy E6 text	<p>Concern that policy doesn't relate to existing accommodation. Finer detail required. Consider revision of policy text to include finer detail relating to existing accommodation</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (xxii)</b>  <b>E6 LPA Comment</b>  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>	c2 – Policy E6 text	<p>Concern about subjective wording for criterion d)</p> <p>Comment considered. Text amendment</p>
<p><b>L5b /cont (xxiii)</b>  <b>E6 LPA Comment</b>  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>	c2 – Policy E6 justification in text	<p>Comment regarding text of Policy E6 criterion e) which reads as a statement – reword to make it a criteria and include justification for the inclusion of a time frame.</p> <p>Comment considered. Text amendment</p>
<b>L6a</b>	Support for Policy E1:2	Support noted. No action

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	CATEGORISATION	PLANNING ISSUE OR ACTION IDENTIFIED
<p>Durham University {parts copied to all Themes, Comments} <b>Page 79 – Policy E1:</b> The allocation has been amended to cover other education uses as per our comments on the previous consultation draft and is welcomed.</p>		
<p><b>L6a /cont (i)</b> <b>Page 79 – Policy E1:</b> Policy E1 of the previous draft did not refer to master plan requirements for these allocations. As previously outlined in our comments on Draft Policy S2 and the supporting text, the requirement for masterplans does not accord with the NPPF. As such references to masterplans should be removed from this policy and the supporting text.</p>	c2 – Policy E1 – text	<p>Concern regarding the inclusion of the requirement for a masterplan in Policy E1 when it does not accord with the NPPF</p> <p>The word masterplan (or master plan) occurs only once in NPPF February 2019; it is in the glossary of terms which states: <i>Design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.</i></p> <p>Comment noted. No action.</p>
<p><b>L6a /cont (ii)</b> <b>Page 79 – Policy E1:</b> We do however consider that the sustainability standards set out at a) to e) are reasonable provided the reference to masterplans is removed.</p>	c2 Support for Policy E1, and text	<p>Comment regarding a masterplan. See above</p> <p>Support and comment noted. No action</p>
<p><b>L6a /cont (iii)</b> <b>Page 80– Site E1.2: – As Paragraph 4.133 Durham Science Park,</b></p>	c2 Policy E1:2	<p>Comment regarding a masterplan. See above</p>

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	CATEGORISATION	PLANNING ISSUE OR ACTION IDENTIFIED
<p><b>Mountjoy</b> As outlined above, the requirement for a masterplan does not accord with the NPPF.</p>		<p>Support and comment noted. No action</p>
<p><b>L6a /cont (iv)</b> <b>Page 80– Site E1.2: – As Paragraph 4.133 Durham Science Park, Mountjoy</b> Any planning application for the site would be required to accord with the design principles set out in paragraph 124 and 127 and therefore the wording is considered to be unnecessary.</p>	c2 Policy E1.2 text	<p>Comment referring to requirement for a masterplan. Mountjoy is considered an important site in Durham City and therefore the requirement for a masterplan and associated design principles should be repeated in the DCNP</p> <p>Comment noted. No action.</p>
<p><b>L6a /cont (v)</b> <b>Page 80– Site E1.2: – As Paragraph 4.133 Durham Science Park, Mountjoy</b> Whilst it can be appropriate to highlight the key issues with the site, the reference to the 15m buffer is considered to be too prescriptive and is not considered appropriate. It should be for the planning application to determine whether such mitigation/detail is appropriate. (it may be greater or lesser than 15m) in the context of a proposed scheme. Furthermore, there is no justification or evidence base for this 15m buffer. The wording is therefore not considered to be compliant with guidance on plan making</p>	c2 Policy E1:2 text	<p>Reference to prescriptive wording of 15m buffer around Mount Joy site. Consider change to text policy and removal of reference to a buffer as a required masterplan should ensure that the surrounding area is protected.</p> <p>Comment considered. Text amendment</p>
<p><b>L6a /cont (vi)</b> <b>Page 80–Paragraph 4.134</b> This has been amended in line with our comments on the previous consultation draft and is welcomed.</p>	Support for Policy E1	<p>Support noted. No action</p>