

Assessing Development Proposals in a changing National Planning system

Council Policy Position Statement

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(Cabinet Version)

**Planning Services
Regeneration and Economic Development**



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1.0 Context and Introduction

1.1 The Government is introducing major changes to the planning system with streamlined national guidance, the abolition of Regional Spatial Strategies, the replacement of Local Development Frameworks with Local Plans and the introduction of statutory Neighbourhood Plans to be prepared by local communities. Many of these changes come through the recently introduced Localism Act. The publication, however, of the National Planning Policy Framework (NPPF) by the Department for Communities and Local Government in March 2012, and in particular the presumption in favour of sustainable development that is introduced has major implications for the Council. We are expected to: “where the development plan is absent, silent, or relevant policies are out of date, grant permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework taken as a whole, or specific policies in this Framework indicate development should be restricted”.

1.2 The NPPF is an important material consideration for planning decisions and this creates a dilemma for the Council, as the County Durham Plan is at a stage in production when the detailed approach to the allocation of land for development has yet to be set out and our Local Plans are between 8 and 16 years old. At the same time, the Council’s Sustainable Community Strategy and the Regeneration Statement set out that we are committed to raising the economic performance of the County by looking to focus development on the key towns that can deliver the development we need to achieve that growth.

1.3 The Council therefore needs to react to the development pressure we are coming under in the light of the national changes in a way that doesn’t jeopardise the evolution of the County Durham Plan, but at the same time allows some proposals, where Local Plans are absent, silent, or out of date to come forward now to help to deliver the Council’s growth agenda. Delivery of appropriate sites now brings a number of benefits, notably in supporting the local economy by increasing economic activity and by delivering new housing (including affordable housing) at a time of economic difficulty.

1.4 The County Durham Plan is subject to public consultation and an examination to resolve areas of disagreement. As such care will be needed to ensure that decisions made ahead of the completion of the Plan do not prejudice the transparency of the Plan making process. Indeed, the starting point for assessing proposals remains Section 38(6) of the Planning and Compulsory Purchase Act of 2004, with the need to treat the Development Plan as the primary consideration.

1.5 This Position Statement seeks to provide for a consistent approach to handling development proposals. It is not the intention that it constitutes an interim policy but rather that it enables consistency for the benefit of Members, Officers and Developers with reference to existing policy and the emerging policies and aspiration of the Government and the Council.

2.0 The National Planning Policy Framework and Localism

2.1 At the heart of the NPPF is “the presumption in favour of sustainable development” – “which should be seen as the golden thread running through both plan making and decision taking”, with local planning authorities expected “to plan proactively to meet the development needs of business and support an economy fit for the 21st century”. The Council is ahead of the game in that context as the emerging County Durham Plan focuses on the importance of delivering economic progress. In terms of pursuing sustainable development the NPPF sets five positive improvements to be sought, including “but not limited to”:

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

2.2. In addition to the NPPF, the planning system is evolving through the Localism agenda, with the emerging Local Plan and Neighbourhood Plan system for plan making. It is for the County Council to make the strategic decisions but neighbourhoods (Parishes) need to have their say and input during the process if Localism is to have buy in from the neighbourhood level. The approval of major proposals ahead of that engagement could undermine the Localism agenda. This is a matter that needs to be considered in dealing with development proposals and most notably through the level of community engagement accompanying a proposal.

2.3 The approach to delivery of “a wide choice of high quality homes” set out in the NPPF is particularly relevant to this paper as residential development will form the bulk of sites under consideration. It states that “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”. The Council’s Strategic Housing Land Availability Assessment (SHLAA) provided the evidence on this matter with supply variable between the former District Council areas, upon which the calculation is still made, with some having a five year supply and others not. When the supply does exist the Council has to take a view on the appropriateness of a site but where it doesn’t, it is expected to look favourably on planning applications subject to achieving sustainable development as set out in the NPPF.

3.0 Assessing Development Proposals

3.1 On the basis that we would deal favourably with development proposals that accord with current Local Plan policies, unless other material considerations weigh against them, the matters that we need to assess in considering other proposals are:

1. What is the status of the Local Plan (including RSS), i.e. is it silent or indeterminate, or is it out of date?
2. What constitutes sustainable development if the Local Plan is considered out of date?

3. Does approval now achieve the emerging objectives of the County Durham Plan or would approval now prejudice the delivery of the County Durham Plan?
4. Is there a five year housing supply demonstrated in the SHLAA?
5. Would demonstrable harm arise as a consequence of approval?

These points are examined below:

What is the status of the Local Plan(s)/Regional Spatial Strategy?

3.2 Although the Government is in the process of abolishing Regional Spatial Strategies, legal advice requires that it should still be considered. The key Policy is Policy 4, which although intended to guide allocations, is equally relevant to site decisions:

RSS POLICY 4: THE SEQUENTIAL APPROACH TO DEVELOPMENT

Local Development Frameworks should adopt a sequential approach to the identification of land for development to give priority to previously developed land and buildings in the most sustainable locations. All sites should be in locations that avoid areas at the highest risk from flooding, having particular regard to the vulnerability of the proposed development to flooding. Locations should be selected in the following priority order:

- a. Suitable previously-developed sites and buildings within urban areas, particularly around public transport nodes;*
- b. Other suitable locations within urban areas not identified as land to be protected for nature or heritage conservation or recreational purposes;*
- c. Suitable sites in locations adjoining urban areas, particularly those that involve the use of previously-developed land and buildings; and*
- d. Suitable sites in settlements outside urban areas, particularly those that involve the use of previously-developed land and buildings.*

For the purposes of this policy, urban areas are defined as the Conurbations, Main Settlements, Regeneration Towns and Rural Service Centres, as defined in this RSS, and Secondary Settlements identified in Local Development Frameworks as providing a significant opportunity in terms of previously developed land and buildings.

All sites should be in locations that are, or will be, well related to homes, jobs and services by all modes of transport, particularly public transport, walking and cycling.

It should be noted that since Policy 4 was prepared other considerations, notably site viability in the current economic climate, may outweigh the sequential test otherwise new development will continue to stagnate.

3.3 The status of saved Local Plan policy is less clear, bearing in mind that the County's seven Local Plans range in age from 8 to 16 years old. Nevertheless, saved allocations will be respected, provided that other material considerations do not weigh against them, although alternative uses can be considered if appropriate. An important point to bear in mind is that it is not necessarily the age of a plan policy that is key but whether it is still consistent in terms of the NPPF. The Council's Planning Policy Team will provide advice on the status of Local Plan policy in relation to a proposal. Should it be concluded that a relevant existing Local Plan policy isn't in place the decision on the appropriateness of the proposal will be guided by the following advice:

Does the proposal constitute sustainable development?

3.4 Bearing in mind the advice in NPPF, this is a key matter. The NPPF objectives for delivering sustainable communities include “widening the choice of high quality homes”. In the Core planning principles set out in the NPPF one requirement is to deliver sufficient community and cultural facilities and services to meet local needs. As a part of the means of delivering on this, work is well under way on the County Durham Infrastructure Delivery Plan (IDP). Further, the Council’s IDP baseline information is well advanced. It would normally be unusual for developers to provide funds for infrastructure beyond that defined in current planning policy in advance of the Council defining its Community Infrastructure Levy. Nevertheless, in the case of consideration of these sites it will negotiate with developers on a site by site basis to seek to agree Section 106 contributions, where a requirement is defined in the developing IDP to help to deliver the infrastructure improvements necessitated by the development. All such negotiations will be carried out in accord with the three tests for Planning Obligations set out at paragraph 204 of the NPPF.

3.5 Whether a site is sustainable or not will not depend solely on infrastructure, so it does not always follow that such contributions can make a site sustainable and therefore acceptable. There may be cases, however, when they do and this will be assessed during negotiations.

3.6 It will be for developers to demonstrate how their proposals achieves the aims of the NPPF set out above, but the Council could look favourably on proposals that offer benefits to meet the aims of the NPPF and the emerging County Durham Plan (see below) There could be no “one fits all” approach and sites would be considered on their merits, but this does give the opportunity to deliver high quality development that would meet the objectives of the emerging County Durham Plan.

The County Durham Plan

3.7 The Council has made good progress with the Plan and has published a Core Strategy to Issues & Options Stage, including preferred options and a later Policy Directions Paper (May 2011). With the Government move to Local Plans, the approach to delivering the County Durham Plan is under review. Nevertheless, the strategic direction of travel set out in the emerging documents is unlikely to change, with the emphasis on certain key settlements, notably the focus on developing Durham City as a major economic driver. The delivery of appropriate sites now brings the economic activity needed to stimulate the local economy, a key aim not only of the County Council but of the NPPF also.

3.8 A part of the development of the Plan is the Settlement Study, which has developed a hierarchy of towns and villages based upon the level of facility. This primary evidence provides a useful indicator of the sustainability of a community in relation to the level of facilities available and allows a degree of assessment of the suitability of a settlement to take development. If a number of large housing proposals were to be approved now, the potential impact on the delivery of the County Durham Plan Core Strategy could be undermined if the location was wrong or the proposal failed to make a satisfactory contribution towards the infrastructure needed to deliver the aims of the Plan.

3.9 The Policy Direction Paper refines the approach to development in the County by setting out the five key elements of the Preferred Spatial Strategy, namely:

1. A strong focus on realising the potential of Durham City as a driver for economic development in County Durham. New employment opportunities are accompanied by complementary new housing and retail development. The provision of the new infrastructure required to support this growth is directly linked to the delivery of the new development.
2. Enabling the other eleven main towns in the County to contribute to future prosperity and to meet the needs of their communities by supporting levels of growth commensurate with their sustainability, physical constraints, land supply and attractiveness to the market.
3. Recognising the aspirations of other settlements, outside of the main towns, to play a part in meeting social and economic needs, and contributing to regeneration, by delivering smaller but significant levels of development.
4. Enabling smaller communities to become more sustainable and resilient, by re-balancing the housing stock and encouraging social and economic vitality. This will be achieved through the identification of grouping of communities and a positive approach to development that delivers community benefits.
5. Recognising that in rural areas, development that demonstrably meets the needs of the local communities, for instance affordable housing and economic diversification, including appropriate small scale tourist development, will be permitted in rural settlements whilst protecting the countryside from wider development pressures and widespread new building.

3.10 This approach has been developed out of two rounds of public consultation, so although the Plan is still emerging, the Spatial Strategy is being firmed up and as such it carries a degree of certainty in terms of the Council's approach. The Policy Directions Paper (May 2011) gives an indication of the level of development for settlements in the top two tiers in the settlement hierarchy. Although these figures will undoubtedly be refined and reviewed as the Plan progresses, they do, when considered in the light of the spatial strategy, give an indication of the scale of development appropriate in these settlements as a whole. The decision by the Secretary of State to refuse the Cala Homes application in Winchester and subsequent decisions was based on the impact it could have on the delivery that Council's Local Plan, so prematurity was an issue. In that case the site was large and represented a substantial element of their housing allocation and their Local Plan was reasonably well advanced. In our case, the Plan is less advanced but as set out above, does have some detail for the quantum of development that could go to the top two tiers of settlements.

3.11 In view of the Secretary of States approach it would seem that the scale of development is relevant in terms of impact on the emerging plan strategy. When assessing proposals therefore developments that do not comprise a significant part of the total set out in the Policy Direction Paper may not undermine the Plan strategy and may be acceptable. In the case of lower tier settlements, where no numbers are defined, the appropriateness of the scale of a proposal can be judged in relation to the scale of the settlement itself. A recent appeal refusal at Bishop Middleham suggested that the scale of development was one of the concerns so precautionary judgement will need to be applied to sites in such settlements when proposals come forward. In considering the scale of a proposal the Council will seek to assess whether it causes harm or is premature in the context of a settlement to avoid developers putting forward small parts of much larger sites to circumvent the plan preparation process.

Five year land supply (residential proposals): the Strategic Housing Land Availability Assessment (SHLAA), Strategic Housing Market Assessment (SHMA), and County Durham Plan Sustainability Objectives

3.12 It is expected that residential schemes will form the bulk of proposals that will need to be considered. In that respect the current Housing Land Supply and the situation set out in the Council's Strategic Housing Land Availability Assessment (SHLAA – i.e. the annual Council assessment of the broad suitability of sites for housing whereby sites are ranked as suitable [green] or unsuitable [amber or red]) are relevant.

3.13 SHLAA sites have been assessed against a set of factors but for the most part they have been assessed on site and locational matters only and not current policy (although green belt has been a factor as set out above). As such, a green designation in the SHLAA does not imply immediate suitability for development and sites have not been assessed for sustainability in the level of detail that Development Plan allocation would require or against the emerging spatial strategy in the County Durham Plan. The acceptance for development of all green SHLAA sites now would also prejudice the ability of developers and landowners of, for example, amber and red SHLAA sites to argue their merits through the preparation of the allocations section of the County Durham Plan.

3.14 The SHLAA does provide a starting point for assessment and is a guide to land supply and remains as an evidence document required in the NPPF. One of the factors that SHLAA doesn't consider in detail is site sustainability and in the case of sites under consideration, developers will need to provide evidence that they have assessed the suitability of their site against the sustainability objectives used by the Council. These are set out in Appendix 1 at the rear of this paper.

3.15 In relation to increasing the supply of housing the NPPF requires LPA's to boost significantly the supply of housing and we should: "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land".

3.16 When sites do come forward it is reasonable that developers contribute to appropriate needs arising from their scheme and it seems appropriate that those putting sites forward accept that their returns will need to factor infrastructure requirements associated with bringing the site forward into their costs and not place a burden on the public purse. In relation to the five year housing land supply requirements, the situation varies between the seven former district areas in County Durham. In areas that lack a five year supply, this will be a material consideration, but it will not negate the need to address the other requirements set out in this paper. However, in areas that have a five year supply potentially appropriate scheme will not be dismissed on these grounds alone on the basis that housing requirements for the County as set out in RSS are not a ceiling.

Would demonstrable harm arise as a consequence of approval?

3.17 This is one of the key premise of the planning system and although points 1 to 4 above cover most material matters, it will also be assessed as part of the consideration of a site.

In addition to the five key points set out above the following matters of detail are also relevant:

Green Belt Sites

3.18 The emerging County Durham Plan proposes green belt deletions to meet its objectives. These proposals have been the subject of support from the development industry but have raised concerns for others in the community. A campaign to protect the green belt around Durham City has been established and for the Government's Localism agenda to have meaning, these concerns will need to be debated through the Plan preparation process to establish the merits of both arguments before a decision on the final approach is taken. The Government has also reasserted the need for Green Belt protection and the requirement to demonstrate exceptional circumstances for any Green Belt deletion remains. As such, it is highly unlikely that proposals that involve the development of green belt land will be viewed favourably in the light of this Paper. The Council's Strategic Housing Land Availability Assessment (SHLAA) has, in the vast majority of cases, not entertained green belt sites, and in the interest of transparency it would be inappropriate to consider such sites as acceptable now at this stage in the preparation of the County Durham Plan.

Affordable Housing

3.19 The current requirements on allocated sites should apply to the consideration of other sites also. Key amongst these is the need to provide affordable housing to the level set out in the Council's Strategic Housing Market Assessment (SHMA). In assessing current proposals that accord with policy the viability of delivering affordable housing is considered and in some cases the requirement has been dropped or reduced on clearly demonstrated viability grounds in order to help deliver development in a difficult market. Such an approach would be less satisfactory when considering these sites, as the delivery of affordable housing is a major need in the County and would be a major benefit that could be material to the acceptability of a scheme. The Council will be pragmatic in assessing the level in relation to SHMA requirements (it is evidence base rather than policy) but landowners and developers should bear this in mind when putting forward proposal. Whilst it is accepted that site viability is a sophisticated balancing exercise, the delivery of affordable housing has been difficult to achieve in the ongoing economic climate so delivery from appropriate sites would be a material benefit.

Recreational and open space needs

3.20 One of the Council's requirements for residential development is appropriate recreational and amenity space both on site and sometimes off site to meet the needs of the new residents of that scheme. The Council has an Open Space Needs Assessment (OSNA) that sets out provision levels in an area and standards for what is required dependant on those existing level of facilities. The Council will assess these and set out the level of contributions that will be required on premature sites, both in terms of on-site needs or off-site contributions.

Community Infrastructure Levy and the Infrastructure Delivery Plan

3.21 The Community Infrastructure Levy (CIL) will set out what contributions developers will need to make to meet the infrastructure needs associated with their development. This work is ongoing and actual charges are still to be determined. If proposals are approved prior to this it could undermine the ability of the Council to deliver its Plan strategy and in the current climate of lack of public funding could have serious repercussions to economic progress. Nevertheless, the evolving Infrastructure Delivery Plan can provide some evidence of needs as set out above in

Para. 3.4. When there is evidence of need the Council will set out such requirements to developers at an early stage in order that they can be factored into their financial viability calculations. In other cases, when information doesn't exist, a judgement would need to be made as to whether any other benefits coming from the development could be considered to provide benefits in lieu, also bearing in mind the economic benefits that a development may bring in its own right. In applying this approach it will be carried out in accord with the requirements on – Planning Obligations set out in the NPPF, through the use of Section 106 agreements.

Residential development on sites allocated for other uses in existing Local Plans.

3.22 The most obvious scenario in this case would be residential proposals on existing employment allocations. In such cases reference will be made to the Employment Land Review (ELR) that has been prepared as part of the evidence base for the County Durham Plan. The ELR suggested that there is an overprovision of employment land in many locations but that other locations, e.g. Durham City, require more. As such, any proposal for a residential or other use (e.g. retail) on existing employment land will be assessed in the light of the ELR and the other emerging County Durham Plan issues set out in the Paper.

Employment and Retail proposals:

3.23 This Paper has concentrated on residential development but it is likely that other proposals, notably employment and retail uses could also be forthcoming.

3.24 In the case of retail proposals the NPPF makes limited changes to the policy approach, retaining the sequential approach to location and also the assessment of impact of proposals on existing centres. As such, proposals will be considered on their merits in line with advice in existing Local Plan policies (where up to date), or NPPF.

3.25 The assessment of employment proposals will be carried out with regard to the Council's commitment to delivering economic improvement across the County. As such, where proposals do not accord with existing policy, the Council will assess the benefits of the scheme and this will be material to the decision, unless it would cause harm to other considerations..

4.0 Key point summary

4.1 The new planning system is a commitment of the Government and the Council wishes to seek to address the implications of this in a positive and pragmatic manner. It is considered that by doing this it will fit comfortably with the Planning Service aim of positively facilitating good development in the County. In this respect there are certain factors that impact on our approach to considering development proposals on sites that the Council regards as departures from current Local Plan policy:

- The policy coverage in the seven existing Local Plans across the County is variable and current planning obligations available through these policies are limited but affordable housing and open space needs are mostly addressed
- The County Durham Plan in an emerging state but reference to its strategy and sustainability requirement provides a degree of guidance in decision making.

- All consideration of such proposals should assess whether approval now would undermine the emerging County Durham Plan strategy or deny other developers and interested parties the opportunity to have their say through the plan preparation process..
- The SHLAA is not an allocations document and acceptance of green sites now could prejudice the opportunity for others to promote their sites through plan preparation. .
- A charging schedule for CIL is some way off but the emerging IDP County Durham Plan evidence base will facilitate negotiation with developers on a site by site basis, in accord with the requirements for Planning Obligations in the NPPF..
- Five year land supply will be taken into account in considering proposals.
- Delivering a supply of appropriate housing sites remains a priority, not only of the NPPF but also of Durham County Council.

In conclusion, the Council intends to act pragmatically on a site by site basis and proposals will not be resisted unless demonstrable harm is evident through the factors set out in the following section.

5.0 Site Assessment guidelines

5.1 This Paper seeks to provide guidance on what factors will be used to assess a proposal in cases when the Local Plan is out of date or when the Council wishes to consider a proposal that is contrary to Local Plan policy but which may have some merits. The following guidelines seek to assess the appropriateness of a land use on a site:

Does the proposal:

1. CONFORM TO THE LAND USE ALLOCATED ON A SITE IN AN UP TO DATE SAVED LOCAL PLAN POLICY– acceptable subject to consideration of detailed issues
2. CONFORM TO A SAVED AND UP TO DATE LOCAL PLAN POLICY FOR LAND USE ON UNALLOCATED LAND – generally acceptable subject to consideration of detailed issues
3. NOT ALIGN WITH 1 & 2 ABOVE BUT ACCORD WITH RSS POLICY – consider other benefits* before making decision (green belt sites highly unlikely to be acceptable)
4. NOT ALIGN WITH 1, 2 or 3 ABOVE BUT ACCORD WITH PPG/PPS – consider other benefits* before making decision (green belt sites highly unlikely to be acceptable)
5. NOT ALIGN WITH 1 to 4 ABOVE BUT ACCORD WITH THE EMERGING COUNTY DURHAM PLAN STRATEGY – consider benefits* proposes by

developer and sustainability issues (green belt sites highly unlikely to be acceptable)

6. NOT ALIGN WITH 1 to 5 ABOVE BUT ACCORDS WITH NPPF – consider impact on emerging Plan Strategy, benefits* proposed by developer and sustainability issues (green belt sites highly unlikely to be acceptable)
7. NOT ACCORD WITH ANY OF ABOVE – unlikely to be acceptable

* for the purpose of these assessments reference to benefits relates to factors that could be material to a decision to accept a proposals where a policy is out of date in the context of advice in NPPF. Such benefits would be addressed as planning obligations in accord with the requirements of the NPPF. The following constitute potential benefits that could be material in considering proposals:

Assessing the benefits arising from the proposal?

5.2 In the case of proposals that don't comply to existing policy, the following factors should be assessed to see if this justifies the approval of a departure:

1. Does the proposal meet the objectives of the emerging County Durham Plan and does it comply with the emerging spatial strategy? The County Durham Plan has been through three rounds of consultation and the emerging spatial strategy is set out above. The approach is subject to further consultation but provides a guide to what might be appropriate in a particular location. To reiterate, this approach is not considered suitable when considering green belt sites. The Council's strategy for the green belt (notably around Durham City) is the subject of both support and objection and it would be inappropriate to make decisions on green belt sites ahead of the ongoing preparation of the County Durham Plan.

2. Does the proposal deliver current needs or contribute to improved facilities in the locality? Much of the evidence base for the County Durham Plan is in place, but notably the OSNA, the SHMA and the developing IPD are key documents. These set out requirements for, in the case of the OSNA, contributions to open space needs in a locality and, in the case of the SHMA provide evidence of affordable housing needs. In a difficult economic climate, the level of these needs offered on a development would be material to consideration of that proposal, as this might present a chance to achieve the delivery of what would otherwise not be delivered. Equally, a developer contribution (negotiated in accord with guidelines in the NPPF) on a site by site basis) to other appropriate infrastructure needs generated by the development, where that need is established through the emerging IDP, would also be material.

3. Is there Community support? In the context of achieving the aims of the Localism agenda and not circumventing the ability of third parties to comment on a proposal as it goes through the preparation stages in the County Durham Plan, does the proposal have local and wider support as indicated through a Statement of Community Involvement or any other means? In cases when there is reasonable or strong support for a proposal this would provide a degree of comfort that to permit it now would not undermine the future County Durham Plan strategy. However, where there are objections to a proposal these will be assessed, for example, to clarify if the objection relates to a matter of detail that can be addresses by the developer, whether it is material to planning or whether it is a matter of principle and approval would undermine delivery of the emerging County Durham Plan.

4. Is the proposal sustainable? Developers submitting an application should assess their proposal against the Sustainability Objectives of the County Durham Plan and also the requirements set out in the NPPF. This would demonstrate the sustainability of a site and, although not providing the opportunity to test the site against others (as would be the case in an assessment during preparation of the County Durham Plan), it would be an indication of a level of sustainability of the site in its own right. Should the appraisal show a lack of sustainability then the developer should indicate the measures proposed to make a location sustainable, as defined in the NPPF.

The Councils' planning staff will be able to provide more guidance on this Paper if required but it is the intention of the Council to take a pragmatic view of the new National Planning situation and of its own aspirations for developing the County's economy, whilst at the same time seeking to avoid prejudicing the open debate that should accompany preparation of the County Durham Plan. As the County Durham Plan continues through the stages of its preparation it starts to carry more weight so this Position Statement will become less relevant.

Appendix 1

County Durham Plan Sustainability Objectives:

Developers should address these objectives as part of their submission

1. To provide everybody with the opportunity to live in a decent and affordable home
2. To promote strong, secure communities
3. To improve education, training and life-long learning, and maintain a healthy labour market
4. To reduce health inequalities and promote healthy lifestyles
5. To reduce the need to travel and promote use of sustainable transport options
6. To alleviate deprivation and poverty
7. To develop a sustainable and diverse economy with high levels of employment
8. To reduce the causes of climate change
9. To respond and enable adaptation to the inevitable impacts of climate change
10. To protect and enhance biodiversity and geodiversity
11. To protect and enhance the quality and character of landscape and townscape
12. To protect and enhance cultural heritage & the historic environment
13. To protect and improve air, water and soil resources
14. To reduce waste and encourage the sustainable and efficient use of materials
15. To improve the sustainability of minerals extraction and use and reduce adverse impacts on communities and the environment