

**County Council**

**17<sup>th</sup> September 2014**



**County Durham Plan:  
Supplement to Consultation Feedback  
Reports.**

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**Report of Ian Thompson, Corporate Director, Regeneration and  
Economic Development  
Councillor Neil Foster, Cabinet Portfolio Holder for Economic  
Regeneration**

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**Purpose of the Report**

1. This report advises Full Council on comments received as part of the final statutory consultation on the Pre Submission Draft version of the County Durham Plan (the Plan) and the Community Infrastructure Levy (CIL) Draft Charging Schedule, that have not previously been subject to consideration by Full Council and were not submitted alongside the Plan for Examination on the 25<sup>th</sup> April 2014.

**Background**

2. On the 2<sup>nd</sup> of April 2014, a report was presented to Full Council. The report advised on:
  - The content of the Submission Draft County Durham Plan;
  - The Content of the CIL Draft Charging Schedule and Regulation 123 List;
  - The nature and outcome of the Pre Submission draft stage Consultation;
  - The Supplementary Planning Documents;
  - An overview of the supporting evidence base;
  - Compliance with the Sustainability Appraisal and Habitats Directive;
  - Soundness of the Plan; and
  - Compliance with the Duty to Co-operate.
3. Full Council endorsed the recommendations, and accordingly the County Durham Plan, CIL Draft Charging Schedule and the supporting evidence base was submitted to the Planning Inspectorate for Examination on the 25<sup>th</sup> April 2014. This included the submission of the Consultation Feedback Report (document reference C1 and C2).
4. Following the submission of the Plan, in August 2014, the Council revisited all of the representations made as part of the Pre Submission Draft Consultation undertaken between the 14<sup>th</sup> of October 2013 and the 9<sup>th</sup> December 2013. As an outcome of this process, the Council has identified

an additional 32 items of correspondence that were not correctly processed. This correspondence contains a total of 86 representations across a number of Plan Policies. As a result of this oversight, these representations were not considered during the production of the Consultation Feedback Report (document reference C1 and C2)

5. The Council is taking the necessary steps to ensure that these additional representations are treated consistently with representations reviewed by Full Council on the 2<sup>nd</sup> of April 2014 and submitted to the Planning Inspectorate on the 25<sup>th</sup> April 2014. This report sets out:
  - The steps taken to ensure that those submitting the additional representations identified have not been prejudiced; and
  - The content of the additional representations.

### **Steps taken to ensure that those submitting the representations have not been prejudiced**

6. It is considered that the Council has undertaken measures with a view to ensuring that none of those persons who have submitted representations, which were not submitted alongside the Plan, have been prejudiced in terms of their participation in the Examination in Public.
7. Following the identification of the additional representations, this correspondence was reviewed and added to the County Durham Plan consultation database in August 2014. This process has ensured that both the Programme Officer and therefore the Planning Inspector have full access to the content of the representations through the objective consultation system. In addition, hard copies of the additional representations were provided to the Programme Officer. This consisted of a set to provide to the Planning Inspector and a set to retain within the Programme Officer's Examination Library, which is open to the public.
8. In processing representations, consultee identification numbers and comment identifications numbers were generated for each additional representation. This enabled the Programme Officer to write directly to each person responsible for submitting the additional representations. This correspondence set out that the Plan had been formally submitted for Examination and offered the opportunity to participate in the Examination in Public to represent their comments. This has ensured that all of those persons submitting the additional representations will have had an opportunity to declare an intention to speak at the examination. A copy of the Programme Officer's letter is attached at Appendix 2.
9. In addition, it is of note that many of those who submitted the additional representations are planning professionals who have made representations on other matters in the County Durham Plan and who would therefore be well aware of the process and procedures for the public examination hearing sessions.

10. As part of processing the additional representations, all of the additional representations were published on the County Durham Plan External Consultation Portal, alongside the other representations.

### **The content of the additional representations**

11. As set out in the Full Council report of the 2<sup>nd</sup> of April, the representations made at Pre Submission Draft Stage have been reviewed and carefully considered. The outcome of this process was the Consultation Feedback Report (document reference C1 and C2). The additional representations have now been subject to the same process. As a result of reviewing the additional representations, it has been concluded that there are no matters arising from the representations that call into question the soundness of the Plan that would have prevented it being submitted to the Secretary of State on the 25<sup>th</sup> April 2014.
12. The Council has given careful consideration to the content of the additional representations. Appendix 3 provides a summary of the content of the additional representations. The table sets out a determination as to whether or not the comments made are considered to be a 'main issue' for consideration. The table then gives consideration as to whether any main issues raised duplicate existing main issues within the Consultation Feedback Report (C1 and C2).
13. Where main issues have been raised, which duplicate existing main issues within the Consultation Feedback Report (C1 and C2), Full Council have had the opportunity to consider these main issues on the 2<sup>nd</sup> of April 2014. The majority of the additional representations raise main issues which have already been subject to consideration by Full Council.
14. In addition, it is important to note that in some instances, where main issues have been raised, the Council has given due consideration to these main issues in other parts of its evidence base including the SHLAA (which has been subject to full Sustainability Appraisal) or as part of the Development Management process.
15. Where the additional representations have set out main issues which were not included within the Consultation Feedback Report (C1 and C2), these main issues have now been included within a Supplement to the Consultation Feedback Report (C1a and C2a). This supplement is attached at Appendix 4.
16. Having carefully considered all of the main issues raised in the additional representations it is considered that there is not a requirement to change the Submission Draft version of the Plan.

### **Recommendation**

17. Full Council is recommended to:
  - 1) Approve the:

- Supplement to the Consultation Feedback Report in Appendix 4;
- 2) Authorise the formal submission of the Supplement to the Consultation Feedback Report and the additional representations to the Secretary of State pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004 and Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 212 of the Planning Act 2008 and Regulation 19 of the CIL Regulations (as amended) 2010.

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**Contact: Mike Allum Tel: 03000261906**

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## **Appendix 1: Implications**

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**Finance** – None

**Staffing** – None

**Risk** – The CDP risk assessment has been updated to accommodate for the additional representations. All risks have been considered in the preparation of this report.

**Equality and Diversity / Public Sector Equality Duty** – None

**Accommodation** – None.

**Crime and Disorder** – None.

**Human Rights** – None.

**Consultation** – Further consultation is not required before Submission of the Plan however there may be a further round following the Examination in Public to consult on any Modifications made by the Inspector.

**Procurement** – None.

**Disability Issues** – None.

**Legal Implications** – Legal opinion has been sought from the Council's in-house legal team and the appointed Barrister on the approach to considering the additional representations, and in particular ensuring that no one is prejudiced as a result of the representations not being submitted alongside the Plan for examination. The approach set out in this report accords with that advice.

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## Appendix 2: Programme Officers Letter

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### THE COUNTY DURHAM PLAN

### EXAMINATION IN PUBLIC

Programme Officer: Jayne Knight Telephone: 03000 263400 email:  
[jayne.knight@durham.gov.uk](mailto:jayne.knight@durham.gov.uk)

Programme Officer Assistant: Richard Bennett Telephone: 03000 261923 email:  
[richard.bennett@durham.gov.uk](mailto:richard.bennett@durham.gov.uk)

Programme Office address: Room 3.46-47, County Hall, Durham DH1 5UQ

14 August 2014

Dear Sir or Madam,

Due to a delay in logging entries in Spatial Policy some of the submissions to the Durham Local Plan had not been initially entered into the council's system.

This has now been rectified; I am contacting you to ensure that you have had chance review the relevant documentation, as well as have the opportunity to include these submissions in the Examination hearings process.

If you do wish to participate on any of the matters please email Jayne Knight directly including; your "ID number", the "comment ID" of the submission, relevant "Policy number" and "Matter" (as found in the attached programme).

All documents are available on Durham Council's Consultation Website;  
<http://durhamcc-consult.limehouse.co.uk/portal/>

In the Examination library part 2; <http://durhamcc-consult.limehouse.co.uk/portal/planning/elp2/>

On the Programme Officer's page; <http://durhamcc-consult.limehouse.co.uk/portal/planning/prog/>

Summaries of your submissions are available through the "Who Said What" feature of the consultation website;

A quick reference guide to the "Who Said What" feature of the website has been added to the Programme Officer's Page, we hope you find this useful to help identify key information for your submissions and communications.

NB: there is now a Programme Officer mailbox [ProgrammeOffice@durham.gov.uk](mailto:ProgrammeOffice@durham.gov.uk) to which statements may be sent, in addition to the 4 printed copies to be sent to;

Room 3.46-47

County Hall

Durham

DH1 5UQ

All statements are to be received by the 29 August at the latest.

Yours faithfully

Richard Bennett

Programme Officer Assistant

**Appendix 3: Summary of the additional representations not included within the Pre Submission Draft Consultation Feedback Report (Documents C1 and C2).**

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
<b>Little Lumley Parish Council (Consultee ID 365766)</b>				
30	4450	Objection to H37 (West of Woodstone Village) site on grounds of loss of greenbelt. Also felt that they wanted to see clearer plans in order to facilitate a valid consultation exercise.	No. Site not actually in greenbelt.	Comments could correlate to other objections made in Feedback Report regarding loss of green open amenity space.
14	4451	Objection to H37 loss of greenbelt land	No. Land not in the greenbelt.	N/a
49	4452	Would like to better understand how H37 site is going to be accessed and the traffic impact on village	No. This is not a representation on Policy 49.	N/a
5	4453	Parish Council "would like to understand more" about contingency arrangements the Council are proposing in order to ensure school place provision.	No. Not an objection	N/a
<b>Susan Brooks (Consultee ID 854015)</b>				
30	4454	Objection to Cadger Bank, Lanchester.	No. This is a non-allocated site.	This has been picked up in the Feedback Report – Objections to Non Allocated Sites.
<b>NLP (Jennifer Nye) Agent ID: 715672 on behalf of Story Homes Ltd (Consultee ID 806564)</b>				
30	4455	Support for H57 (South of Eden Drive, Sedgfield).	Yes	Yes. One other respondent thought the allocation was sound.
1	4456	Strong support for policy as pro sustainable	Yes	Yes. This is picked up in the



Policy	Comment Id	Content of representation	Considered to contain a Main Issue	Issue addressed in Feedback Report
		development and in accordance with NPPF.		FEEDBACK REPORT - bullet 1.35 other respondents found policy sound.
2	4457	Supports core principles of spatial approach.	Yes	Yes. This is picked up in Feedback Report – bullets 1-4. Majority of respondents found policy sound.
3	4458	Endorse DCC housing requirement as a minimum.	Yes	Yes. This is picked up in the Feedback Report – bullet 4.
4	4459	Broad support for distribution of development.	Yes	Yes. This is picked up in the Feedback Report – bullet 1.
5	4460	Policy should align further with NPPF paras 203-206. Support for Developer Contributions SPD but concern that this is not being tested through Local Plan Process.	Yes	Yes. This is picked up in the Feedback Report – bullet 5. This is picked up in the Feedback Report – bullet 10.
16	4461	Criteria (h) in policy overly prescriptive and conflicts with policy 34.	Yes	Yes. This is picked up in the Feedback Report – bullet 1.
31	4462	<u>Affordable Housing</u> In order to align with NPPF flexibility should be built into this policy. Important that Council does not deter landowners	Yes	No. All comments addressed in Feedback Report, except for support for

Policy	Comment Id	Content of representation	Considered to contain a Main Issue	Issue addressed in Feedback Report
		<p>from releasing land. Support three year review but should be carried out with housing needs assessment through SHMA. Support for 10% in South Durham</p> <p><b>Older Persons</b> Greater clarity required behind threshold of 10% older persons housing. Viability concerns raised. Policy should more flexible worded by referring to lifetime homes.</p>		10% affordable housing in South Durham.
34	4463	Policy supported.	Yes	Yes. This is picked up in the Feedback Report – bullet 1.
40	4464	Generally support policy but proposed change of wording.	Yes	Yes. This is picked up in the Feedback Report – bullet 1.
41	4465	Suggest 3 <sup>rd</sup> paragraph should be more flexible.	Yes	Yes. This is picked up in the Feedback Report – bullet 1.
48	4466	Policy should align with paras 203-206 of the NPPF and provide more certainty and clarity.	Yes	Yes. This is picked up in the Feedback Report – bullet 22.
Signet Planning (John Wyatt) Agent ID 549537 on behalf of Story Homes Ltd (Consultee ID 806564)				
3	4467	<p>Housing requirement of 31,400 is too low.</p> <p>Plan does not allocate sufficient sites to meet 31,400 target and does not make provision for buffer of sites.</p>	Yes	<p>Yes. This is picked up in the Feedback Report – bullet 2.</p> <p>Not picked up in Feedback</p>

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
		Revised housing trajectory shows less commitments and completions than last draft. Therefore further sites actually needed.		Report against this policy but is picked up against policy 30 bullet points 7 and 8.  Not picked up in Feedback Report against this policy but is picked up against policy 30 bullet points 6 and 7.
4	4468	Proposed housing numbers for 'rest of Central Durham' too low. Further site allocation required. This is in part picked up in the Feedback Report – Central Durham bullet 3.	Yes	Yes.
30	4469	Allocate land north of Newbiggin Lane, Lanchester. (Parcels 1/LA/06 a-e in the SHLAA).	Yes	No.
GVA (Richard Newsome) Agent ID 548812 on behalf of John Gibson and Son (Consultee ID 854389)				
3	4470	Housing requirement of 31,400 is too low.	Yes	Yes. This is picked up in the Feedback Report – bullet 2.
4	4471	Until overall quantum of development is increased then the spatial distribution cannot be found sound.	Yes	Yes. This is picked up in the Feedback Report – General bullet 6.
6	4472	Welcome the identification of Durham City as a key location for new housing. When overall quantum of development required is	Yes	Yes. This is picked up in the Feedback Report – bullet 3.

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
		increased then housing should be accommodated in Durham City.		
8	4473	When overall quantum of development required is increased then site 4/DU/107 should be allocated as a strategic site, either in part or in full.	Yes	Yes. Not picked up in Feedback Report against Policy 8 but picked up in Feedback Report against Policy 30.
14	4474	When overall quantum of development required is increased then site 4/DU/107 should be released from the greenbelt.	Yes	Yes. This is picked up in the Feedback Report –bullet 1.
30	4475	When overall quantum of development required is increased then site 4/DU/107 should be allocated in the Plan.	Yes	Yes. This is picked up in the Feedback Report – Additional Housing Sites submitted at the pre-submission draft stage.
30 Proposal Map	4476	Removal of site from the greenbelt. Either in full or part depending on housing requirement. If no additional housing required in Durham City, or only part of the site is required then the whole site should still be removed from the greenbelt on the proposals map and safeguarded for future development beyond the plan period.	Yes	Yes. Picked up through Feedback Report for policy 30.
14 Proposal Map	4477	Removal of site from the greenbelt. Either in full or part depending on housing requirement. If no additional housing	Yes	Yes. Picked up through Feedback Report for policy 30.

Policy	Comment Id	Content of representation	Considered to contain a Main Issue	Issue addressed in Feedback Report
		required in Durham City, or only part of the site is required then the whole site should still be removed from the greenbelt on the proposals map and safeguarded for future development beyond the plan period.		
Great Willington Town Council (Consultee ID 852872)				
2	4445	Willington / Crook together should be designated as one of the 12 no. Main Towns identified by Policy 2 as supporting the sub-regional centre of Durham City.	No	N/a – comment on settlement study evidence base rather than Policy.
30	4446	Seek the reinstatement of the allocation of land located opposite West Road - Preferred Options Document Site HA/104 (SHLAA 3/WL/01).	Yes	Yes. This is picked up in the Feedback Report – Additional Housing Sites submitted at the pre-submission draft stage.
25	4447	Seek the allocation for retail development of the site accommodating an extant planning permission (Reg Ref: CMA/3/33) for the construction of a supermarket at 45 High Street, Willington.	No	N/a – site is a commitment.
26	4448	Seek the identification of Crook / Willington as a Small Town Centre in Policy 26.	No – relates to Settlement Study Evidence Base	N/a
9	4449	Strong support for the proposal to construct the Durham City Western Relief Road.	Yes	Yes. 6 respondents found the policy sound
Mineral Products Association MPA (Consultee ID 364871)				
60	2231	Object to the MSA not being shown on the	Yes	Yes. Comments

Policy	Comment Id	Content of representation	Considered to contain a Main Issue	Issue addressed in Feedback Report
		proposals map. Object to the thresholds detailed in criteria E of Policy 60. Object to methodology for defining safeguarding area for sand in Appendix D. They require changes to Appendix E. These issues are picked up in the Feedback Report –bullet 4.		included in Feedback Report.
PAR Petroleum (Consultee ID 797310) –Mark Smith, Wardell Armstrong LLP (Agent ID 797302)				
14	4442	Request for Land adjacent to the west of Lumley Sixth Pit Industrial Estate to be removed from the Green Belt.	Yes	No.
23	4443	Request for Land adjacent to the west of Lumley Sixth Pit Industrial Estate to be removed from the Green Belt.	Yes	No.
Prof Timothy Clark (Consultee ID 502907)				
Sustainability Appraisal Report & Non-technical summary	211	Raised concern over the approach to the SA and that it doesn't consider the potential residual effect of mitigation proposals	Yes	Yes - Identical rep to that made by Roger Cornwell for City of Durham Trust (Comment ID 176).
Mrs L Rippon (Consultee ID 712756)				
30	4527	Objection to Cadger Bank.	No. This is a non-allocated site.	This has been picked up in the Feedback Report – Objections to Non Allocated Sites.
Mr Mark Willett (Consultee ID 854987)				

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
9	4540	Objects to new roads around Durham	Yes	Yes – in detail
10	4542	Objects to new roads around Durham	Yes	Yes – in detail
<b>Ian Waterstreet (Consultee ID 855024)</b>				
14	4554	Support for non-strategic green belt release at Fencehouses	Yes	Yes - specifically
<b>Tom &amp; Caron Herron (Consultee ID 855023)</b>				
30	4556	Objects to allocation H26 at Consett	Yes	Yes – Other reps to site raising same issues
<b>Mr John Harrison (Consultee ID 439744)</b>				
30	4564	Objects to allocation H26 at Consett	Yes	Yes – Other reps to site raising same issues
<b>J K Gale (Consultee ID 855055)</b>				
2	4574	Objecting to lack of Plan proposals for Tow Law and the focus on Main Towns	Yes	Not specifically in relation to Tow Law but the issues of focus on main towns and of not considering the needs of smaller settlements is noted
23	4575	Objecting to lack of Plan proposals, addressing employment issues Tow Law	Yes	As above
<b>Ms Gillan Gibson for CPRE (Consultee ID 365574)</b>				
Para 3.1	4596	Detailed rep covering a number of Plan matters but focusing upon the Vision	Yes	An identical rep has been recorded as unknown respondent and responses prepared.
23	4599	Objection to removal of land south of Drum from green belt	Yes	Yes – specifically referenced

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
<b>Mr John Garrod (Consultee ID 707709)</b>				
30	4601	Supports removal of Plcktree housing allocation.	No. This is a non-allocated site.	This has been picked up in the Feedback Report – Objections to Non Allocated Sites.
<b>Jane Walker (Consultee ID 855155)</b>				
6	4619	Objects to the amount of development in Durham City.	Yes	Yes - in detail
32	4621	Too many students in Durham City.	Yes	Yes - in detail
<b>Anne Stead (Consultee ID 855175)</b>				
30	4642	Object to East of Mill Lane	Yes	Other objections have been made to this site.
<b>Dawn Dodds (Consultee ID 855195)</b>				
8	4664	Object to Sniperley Park Strategic Housing Allocation	Yes	Yes – in detail
<b>Roger and Susan Hudspith (Consultee ID 716735)</b>				
32	4667	Too many students in Durham City.	Yes	Yes - in detail
6	4668	Objects to the amount of development in Durham City.	Yes	Yes - in detail
7	4669	Uncertainty over end users of Aykley Heads.	Yes	Issues included in Feedback Report.
9	4670	Object to Western Relief Road.	Yes	Yes
10	4672	Object to Northern Relief Road.	Yes	Yes
<b>Alan Hayton (Consultee ID 855201)</b>				
30	4677	Support allocation of Whinney Hill housing allocation.	Yes	Support
32	4682	Failure to treat Policy 32 as strategic is unsound.	Yes	Yes – in detail
<b>J M Spalding (Consultee ID 855204)</b>				
30	4678	Object to Stockton Road, Sedgfield housing	Yes	Other objections have



<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
		allocation.		been made to this site.
<b>Maze Planning (Consultee ID 714809)</b>				
30	4708	Proposes site allocation at English Martyrs School.	Yes	Although not an allocation and not captured in the Feedback Report this site would be acceptable for housing development under existing and future plan policy.
<b>Richard Smith (Consultee ID 800989)</b>				
30	4712	Object to East of Mill Lane	Yes	Other objections have been made to this site.
<b>Ian Lyle (Consultee ID 855182)</b>				
2	4655	Support the Spatial Approach.	Yes	Support
3	4657	Support the housing requirement.	Yes	Support
4	4658	Too much housing in Central Durham and not enough in West Durham.	Yes	Issues included in feedback report.
6	4659	5200 houses in Durham City is not achievable.	Yes	Not specifically mentioned but very similar comments included.
9	4660	Object to Western Relief Road.	Yes	Yes
10	4661	Object to Northern Relief Road.	Yes	Yes
15	4662	Support approach on unallocated sites.	Yes	Support
30	4663	Support approach of policy.	Yes	Support
35	4665	Changes required to Policy 35 because of confusion on how it works with Policy 15 and policy needs to be	Yes	Issues included in Feedback Report.

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
		more flexible.		
<b>T Manners Sons (Consultee ID 715681)</b>				
5	4730	Object to level of CIL in the Durham charging zone.	Yes	Yes in Feedback Report for CIL Charging Schedule.
15	4728	Policy overly restrictive	Yes	Issue included in Feedback Report.
30	4726	Proposed additional housing allocation at Vicarage Farm Close, Escomb	Yes	Not included in Feedback Report however the information provided is a resubmission of that submitted at the Preferred Options stage and has been fully considered.
35	4729	Changes required to Policy 35 because of confusion on how it works with Policy 15 and policy needs to be more flexible.	Yes	Issues included in Feedback Report.
<b>Stephen Hudspith (Consultee ID 798441)</b>				
9	4734	Believes the Western Relief Road would be ineffective in reducing congestion.	Yes	Yes – in detail
<b>Mr Boon (consulee id 710164) Andrew Moss (agent ID 459107)</b>				
30	4748	Support housing allocation but objects to phasing of site.	Yes	Issue included in Feedback Report Sites (C2)
<b>Story Homes (Consutee ID 806564) John Wyatt Signet Planning (agent id 549537)</b>				
25	4754	Proposed that the identified retail need should to be accommodated on the housing allocation H55 together with housing.	Yes.	No. However this proposal has been known to officers through Development Management.

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
4	4753	The yield proposed for housing allocation H55 is too low and should be allocated for an additional 91 houses.	Yes.	Yes issue included in Feedback Report Sites (C2).
23	4752	Suggests that the County's housing requirement is too low. Should include a 10% allowance for under delivery.	Yes.	Yes issue of the quantity being too low is reflected in Feedback Report against Policy 3. No specific mention of a buffer.
25	4751	Reduced yield for site allocation H55 should be higher at 291 houses. H55 placed in the "medium" term phasing option but should be "short" term.	Yes.	Yes both issues included in Feedback Report Sites (C2).
B Glassford (Consultee ID855937) Sarah Worthington Peacock and Smith (agent id 855934)				
30	4758	Land west of Thorpe Road, Easington should be allocated as an additional site in Easington because of the land supply and build out rates across East Durham.	Yes.	No. However the site was made known through the Development Management process.
12	4759	The executive housing allocation at Lambton exceeds the 1% target and thus diminishes the potential effectiveness of Policy 13. Land west of Thorpe Road could assist in a more dispersed approach to executive housing.	Yes.	Yes. The issue of a more dispersed approach to executive housing is included although land west of Thorpe Road was not included for consideration as an alternative executive housing site.

<b>Policy</b>	<b>Comment Id</b>	<b>Content of representation</b>	<b>Considered to contain a Main Issue</b>	<b>Issue addressed in Feedback Report</b>
13	4760	The criteria included in Policy 13 is too onerous particularly the final criterion.	Yes.	Yes. Specific mention is made regarding each of the criterion.
Gleeson Homes (Consultee id 855930) John Wyatt Signet Planning (agent id 549537)				
30	4756	H54 can accommodate a potential yield of 130 units. The phasing should be "short" term.	Yes.	No. Although reference is made to a larger parcel of the site which could accommodate a greater number of units.
30	4757	Chilton could support a higher distribution. It is currently too low.	Yes.	No.

**Appendix 4: Supplement to the Consultation Feedback Report (C1a and C2a).**

<b>Relevant of the Pre-Submission Draft Plan</b>	<b>Summary of Main Issues Raised</b>	<b>Council Response to Main Issues</b>
Policy 2 (Spatial Approach)	Specific reference should be made to Tow Law.	Other than the sub-regional centre Durham City, no specific mention is made to any settlement.
Policy 3 (Quantity of Development)	Plan does not allocate sufficient sites to meet 31,400 target and does not make provision for buffer of sites.  Revised housing trajectory shows less commitments and completions than last draft. Therefore further sites actually needed.  A 10% buffer should be applied.	The Plan allocates sufficient land to meet the 31,400 housing requirement.  A discount approach is enshrined in the trajectory to ensure a realistic approach to existing commitments is applied.
Policy 4 (Distribution of Development)	Additional housing should be proposed for Chilton.	The proposed level of housing for Chilton is considered to be appropriate.
Policy 6 (Durham City)	5,200 new homes for Durham City is not achievable.	The proposed level of growth for Durham City is evidenced as achievable.
Policy 14 (Green Belt)	Request for Land adjacent to the west of Lumley Sixth Pit Industrial Estate to be removed from the Green Belt.	All alternative sites proposed will be put to the Inspector at Examination in Public for consideration.
Policy 23 (Employment Land)	Specific reference should be made to Tow Law.	General employment allocations at Tow Law are specifically mentioned.
Policy 25 (Retail Allocations and Town Centre Regeneration Areas)	The retail need identified for Ferryhill could be accommodated, together with housing, on allocation H55 (South of Dean Road).	All known sites in Ferryhill were assessed. Land at Dean Road is considered as suitable for housing but not retail given it would constitute out of town retail development.

Policy 30 (Housing Land Allocations)	Alternative site proposed at Newbiggin Lane, Lanchester (SHLAA refs 1/LA/06a, b, c, d, e).	The Newbiggin Lane site, Lanchester was deemed unsuitable for development within the SHLAA. The site is currently subject to a live planning application.
	Support for the site H4 (Whinney Hill).	Support welcomed.
	Alternative site proposed at English Martyrs School.	The English Martyrs School site will be subject to Policy 15 (Development on Unallocated Sites in the Built Up Area).
	Alternative site proposed at Vicarage Farm Close, Escomb (3/ES/02).	Vicarage Farm, Escomb - whilst this site was deemed suitable for housing purposes through the SHLAA there are sustainability concerns due to the limited facilities within Escomb.
	Land West of Thorpe Road, Easington should be considered as an additional allocation.	Land West of Thorpe Road, Easington - whilst was not considered through the SHLAA process, the site was discussed through the DM process and deemed to be unsuitable for residential.
	Site H54 (West Chilton Farm), a higher yield and short term phasing.	West Chilton Farm was minded to approve at planning committee subject to the agreement of the Section 106. The permission was for 136 units rather than 118 as estimated within the Plan.
Policy 31 (Addressing Housing Need)	Support for the 10% affordable housing target for South Durham.	Support welcomed.