

**County Durham Plan**

**Issues and Options  
Consultation Feedback  
Report**

**June 2018**

*Altogether better*



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**1** The purpose of the Issues and Options consultation feedback report is to provide a summary of the representations made in response to the Local Plan Issues and Options Report (June 2016) and to set out the council's response to this summary of the representations.

**2** Consultation on the Local Plan Issues and Options Report was undertaken between, 14 June 2016 and the 8 August 2016. All duly made representations submitted in response to the Issues and Options Report have been considered when preparing the County Durham Local Plan Preferred Options.

**3** A total of 4,932 responses were received from 823 respondents. In addition, social media played a large part of the consultation process with social media messages viewed 438,633 times and generating a total of 762 comments, albeit these were not submitted via the formal process.

### **Statement of Community Involvement**

**4** The council's Statement of Community Involvement describes how we will involve our local communities, our businesses and all other organisations in the preparation of the County Durham Plan (the Plan) and on planning application decisions. It also sets out our advice on how County Durham town and parish councils and neighbourhood forums should seek to involve and consult on the preparation of Neighbourhood Plans. The council's Statement of Community Involvement can be accessed here:

<https://www.durham.gov.uk/article/3282/Statement-of-Community-Involvement>

### **Who was consulted on the Issues and Options Report**

**5** The relevant Regulations require us to consult with the relevant 'specific consultation bodies', the 'general consultation bodies', residents and persons carrying on business in our area. We are also required to consult with the people and bodies anticipated by our Statement of Community Involvement.

**6** Additionally, a 'duty to co-operate' applies under section 33A of the 2004 Act which requires us to co-operate on strategic plan-making matters with a number of prescribed bodies.

**7** The purpose of the Statement is to set out who we have consulted, how we have consulted them, and how we have taken into account their representations. In accordance with our Statement of Community Involvement, we sought to consult as widely as possible on the Issues and Options Report including:

### **General Consultation Bodies**

- These groups include: voluntary bodies such as the Voluntary Organisation Network and other known community groups; bodies representing the interests of racial, ethnic or national groups including the Gypsy and Traveller Law Reform; bodies representing the interests of different religious groups; bodies representing the interests of disabled groups including the Disability Alliance and Disability Access; and bodies representing of persons carrying on businesses such as Business Durham and the North East Chamber of Commerce.

### Specific Consultation Bodies / Prescribed Bodies under the Duty to Co-operate

- These groups include the Coal Authority; the Environment Agency; Historic England; the Marine Management Organisation; Natural England; Civil Aviation Authority; Network Rail; Highways England; Clinical Commissioning Groups; Homes England; relevant local enterprise partnerships utility providers including Northumbrian Water and Northern Powergrid and the Local Nature Partnership.
- Specific consultation bodies include our neighbouring authorities: Northumberland County Council; Gateshead Borough Council; Sunderland City Council; Hartlepool Borough Council; Stockton Borough Council; Darlington Borough Council; Richmondshire District Council; Eden District Council; North Yorkshire County Council and Cumbria County Council. As well as neighbouring authorities these bodies also include Town and Parish Councils and relevant Neighbourhood Forums and those in adjoining neighbouring authorities.

### Residents and other persons carrying on business in the County

- As many as possible residents and other interested parties with an interest in the county are to be involved in the preparation of the local plan. Including those already registered on our consultation database but further efforts are made as set out in our Statement of Community Involvement and working with our communications and marketing team particularly those who are under-represented in the planning process by continually expanding our consultation techniques such as social media.

### Other Bodies and Persons referred to in the Statement of Community Involvement

- Across the county there are fourteen Area Action Partnerships (AAPs) which are made up of an area forum and an area board to identify and tackle issues in local communities. AAPs have been set up to give people in County Durham a greater choice and voice in local affairs. The partnerships allow people to have a say on services, and give organisations the chance to speak directly with local communities. By working in partnership we help ensure that the services of a range of organisations - including the county and town and parish councils, police, fire, health, and voluntary organisations - are directed to meet the needs of local communities and focus their actions and spending on issues important to these local communities. Other known community organisations registered on our consultation database are also invited to participate in the consultation.

#### Methods of engagement

**8** A wide range of communication methods were used to inform and engage with County Durham residents and other interested parties. Methods of communication and engagement included:

- **Internet** - The County Durham Plan Issues and Options report and other documents associated with the consultation were made available both to view and to download on the County Durham Plan Consultation Pages, <http://durhamcc-consult.limehouse.co.uk/portal/>. The Issues and Options consultation

was also publicised on the council's home webpage, [www.durham.gov.uk](http://www.durham.gov.uk) and the main County Durham Plan Web page, [www.durham.gov.uk/cdp](http://www.durham.gov.uk/cdp). The Issues and Options consultation was also listed on the council's consultation webpage <http://www.durham.gov.uk/consultation>. In terms of the council's website traffic, the County Durham Plan Web Page was viewed 29,106 times. During the consultation period the County Durham Plan webpage [www.durham.gov.uk/cdp](http://www.durham.gov.uk/cdp) was the the most popular page on the council's website. Only the council home webpage, search tool and jobs were above it in terms of popularity.

- **Social Media** - In order to maximise publicity both Facebook and Twitter were also used. Social media messages were seen a total of 438,633 times. In total there were 41,801 engagements with Facebook posts of which 30,000 (approximately) were video views.
- **Direct Contact** - All individuals and organisations on our consultation database were contacted either by email or by letter. We also requested that all fourteen of the County Durham Area Action Partnerships (AAPs) provide information to their members via email to their own database of contacts. A list of Frequently Asked Questions was also prepared to ensure consistent messages across the council including customer services.
- **Community Venues** - Copies of the Issues and Options Report were placed on deposit at all local libraries and at council customer access points. Posters were also sent to these locations and a stock of Executive Summary documents which could be taken away by the public and paper response forms were also be provided to these locations. Copies were also sent to the Library Service for their mobile library service.
- **Local Newspapers** - Public Notices / Adverts were placed in local newspapers including the Chester-le-Street Advertiser, Consett and Stanley Advertiser, Darlington, Aycliffe and Sedgefield Advertiser, Durham Advertiser, Northern Echo, Sunderland Echo and the Wear Valley Advertiser. A press release was also sent to the Northern Echo, Durham and Weardale Advertiser, Durham Times, Newton News, Peterlee Star, Weardale Gazette, Teesdale Mercury, Sunderland Echo and Hartlepool Mail.
- **Other Local Media** - A news story relating to the Issues and Options Report was also placed in the 'County Durham News' which is the council's free magazine which is delivered to all residences in the county and is also available in local libraries throughout the county. A news story was placed in the council staff magazine which is seen by all council employees. We also requested that all fourteen of the County Durham Area Action Partnerships (AAPs) provide information to their members via their own news letters. An item was also provided for the County Durham Association of Local Councils newsletter and the County Durham Partnership newsletter.
- **Meetings and Consultation Events** - Council officers attended a range of pre-existing organised meetings where presentations were made or information provided to inform local communities and interested parties that the council was consulting on the Issues and Options Report. Key meetings and consultations events included (but were not limited to):

- Fifteen staffed consultation events were held throughout County Durham. These events enabled residents and other interested parties to find out about the council's work to prepare a new Plan and ask questions. Copies of the executive summary, the Local Plan Issues and Options report and the paper response form were also available at these events free of charge.
  - Exhibition boards which provided information about the County Durham Plan and the Issues and Options Report were installed at twelve popular community venues (on two week rotations).
  - Officers attended Area Action Partnership meetings and undertook presentations where possible.
  - A business breakfast was held with County Durham Businesses.
  - Staff attended the Durham University residents forum.
- **Printed Media/Publicity Material** - Posters were distributed to a range of venues to provide information on the document and the consultation period. Similarly, 2,200 executive summaries and 600 copies of the Local Plan Issues and Options Report were printed and made available to the public for no fee.
- 9** Through the consultation the council sought to specifically engage with a range of hard to reach groups including:
- Communication with Gypsy and Travellers was progressed through information presented to the site wardens from Gypsy and Traveller Sites at their regular meeting with the council;
  - Information was sent to the Voice magazine (publication targeted at young people) with a request that they include an article in their magazine to help reach young people.
  - Communication with older people was progressed through contacts in the council's Children and Adult Services. Information on access to documents and events was distributed through Age Concern as well as through general consultation with groups representing older people.

#### Structure of this document

**10** The document contains five chapters which provide feedback on the Issues and Options documents key chapters which considered:

- The Local Plan's Vision and Objectives;
- How much development County Durham needs for the future and where it should be located;
- The Local Plan's Core Principles;
- Feedback on other Comments; and
- Feedback to Duty to Cooperate Bodies.

There are also 2 appendices which cover 2 relevant consultations that have fed into the Plan making process but were done separate to the Issues and Options consultation.

- Feedback on Tudhoe Grange Upper and Lower School consultation.
- Feedback on Identifying Mineral Safeguarding Areas and Safeguarding Mineral Handling, Processing and Transportation Infrastructure in County Durham.

## Question 1 - Spatial Vision for County Durham

**Question 1 - Is this an appropriate Spatial Vision for County Durham, or is there something missing or a more suitable alternative? Please give reasons for your response.**

Number of Representations in policy area

146

**Summary of main issues raised by representations**

- General support for the Spatial Vision.
- More should be added to the vision supporting the regeneration of those areas within the county with the highest levels of deprivation.
- The county should rely less on old industries and focus more on high skilled jobs.
- The Vision focuses too much on Durham City and Aykley Heads and building in the Green Belt.
- Tourism and mineral extraction are not compatible.
- Should also include education, leisure and cultural opportunities to improve people's well-being.
- The vision should recognise the importance of public sector jobs as well as private.
- County Durham should aim to be carbon neutral and use its resources carefully.
- There should be more provision for older people rather than students.
- Should mention east west road links rather than just north south.
- The importance of the role of smaller towns and larger villages should be recognised.
- The housing element of the vision is important for County Durham because of the lack of choice and quality within the current stock.
- Welcome the recognition of the importance of green infrastructure.
- New housing needs to be supported by more infrastructure.
- The Vision is too aspirational and is too vague about how it will be achieved.
- Too focused on the economy and not the environment and too much emphasis on unsustainable forms of transport.
- There should be more in the Vision on people's quality of life.

**Responses to main issues**

- Text has been added to the vision regarding revitalising those areas within the county with the highest levels of deprivation.

**Question 1 - Is this an appropriate Spatial Vision for County Durham, or is there something missing or a more suitable alternative? Please give reasons for your response.**

- The importance of the public sector to the county is accepted, note the council's support for the high quality office relocations (and therefore retention in the county) for NS&I and the Passport Office.
- The growth of the private sector is a key element in growing the county's economy.
- An important part of the Vision is the aim to establish a low carbon economy and to use resources efficiently.
- Acknowledge that addressing the needs of all housing types is important and homes for older people is a matter the Plan addresses.
- In terms of east west road links, reference to the A66 has been added to the Vision.
- The Vision advocates the development of sustainable patterns of development including allowing development in smaller settlements to make them sustainable and resilient.
- The Vision recognises the importance of having a range of choice of good quality housing.
- The availability of existing infrastructure and the ability for development to contribute to new infrastructure has been a key consideration in the development of the Plan's spatial strategy and allocations.
- It is acknowledged that the Vision is aspirational and high level with the detail of how it will be achieved in the objectives and policies.
- The Vision is written for the whole county and has no focus on the future of any specific settlement.
- Both the economy and the environment are important to the future of the county and the Vision and the Plan as a whole seeks to balance the needs of both as well as social objectives.
- The Vision includes reference to sustainable transport and increased use of public transport, cycling and walking.
- Agree that quality of life is an important issue and a reference has been added to the Vision.

**Question 2 - Objectives**

**Question 2 - Do you agree with the objectives? Can you suggest any alternatives and are there any missing?**

Number of Representations in policy area	156
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**Summary of main issues raised by representations**

- General support for many of the objectives.
- There are too many objectives, should have a smaller number of key objectives.

**Question 2 - Do you agree with the objectives? Can you suggest any alternatives and are there any missing?**

- The objectives are too focused on Durham City and Aykley Heads and building in the Green Belt.
- The Vision is too aspirational and is too vague about how it will be achieved.
- Education should feature more in the objectives.
- Would like a reference to the re-use of land e.g. brownfield.
- An objective relating to noise pollution and air quality should be added.
- Need an objective to improve the relationship between the county and the university.
- The sustainable communities objective only refers to new development but should also reference the need to maintain balanced communities.
- Natural environment objective should include reference to connectivity of habitats.
- Objectives should include clear targets to measure their success.
- The objectives do not effectively deal with an ageing population and a lack of young skilled workers.
- Some objectives contradict each other.
- The economic ambition objective should be made clearer to show that it is the economy of the whole county that is being improved.
- Should broaden the scope of water management beyond flood risk.
- Housing needs of specialist groups should also include reference to young people.
- Sustainable communities objective should also include reference to encouraging travel by means other than the private car.
- Objectives and the Plan as a whole should seek to reduce inequalities.
- The objective relating to low carbon should be clearer in its support for renewable energy.

**Responses to main issues**

- The number of objectives reflect the wide remit the Plan covers and each topic area is considered appropriate.
- The objectives are written for the whole county and has no focus on the future of any specific settlement. The objective relating to the Green Belt support its aims and purposes.
- It is acknowledged that some of the objectives are aspirational and high level with the detail of how they will be achieved in the policies.

**Question 2 - Do you agree with the objectives? Can you suggest any alternatives and are there any missing?**

- Reference to the importance of education is included in the objectives relating to infrastructure, raising aspiration and quality of life.
- Acknowledge the need to refer to brownfield land and an additional objective on the effective use of land has been added.
- A reference to all forms of pollution and air quality has been added to the quality of life objective.
- Although there is no specific reference to balancing the needs of the University and the resident population, it is an issue addressed by specific policies in the Plan.
- The objectives advocate sustainable patterns of development including allowing development in smaller settlements and rural areas.
- Natural environment objective amended to include reference to connectivity.
- The polices in the Plan include a comprehensive set of targets and indicators to measure their success. It is not necessary to duplicate this in the objectives.
- The housing need objective seeks to ensure that the needs of older people are met. The economic ambition objective also seeks to create more and better jobs for all types of worker.
- The policies in the Plan seek to balance the requirements of the different objectives to produce a overall approach that is sustainable.
- The economic ambition objective has been amended to show that it is the economy of the whole county that is being improved.
- Reference added to an integrated approach to water management.
- The list of the housing needs of specialist groups has been amended to include young people.
- Sustainable communities objective has been amended to include reference to encouraging travel by means other than the private car.
- The Plan is subject to an Equality Impact Assessment as part of its preparation and includes an objective that specifically to address inequality.
- The objective relating low carbon has been amended support for renewable energy.

### Quantity of Development (How Much)

#### Question 3 - Is County Durham a single Housing Market Area for developing housing needs

Question 3 - Do you agree that County Durham is a single Housing Market Area for developing housing needs? Please give reasons for your response.	
Number of Representations in policy area	102
Summary of main issues raised by representations	
<ul style="list-style-type: none"> <li>• There was a general acceptance that County Durham is a self contained housing market against Planning Practice Guidance.</li> <li>• There is also an suggestion that there should be co-operative working with both Tyne and Wear and with Tees Valley especially regarding commuting across administrative boundaries.</li> <li>• The housing needs in Durham City are very different to those of former mining communities and those in rural areas. There should be a focus placed on regenerating former mining villages.</li> <li>• There is a danger that Durham City becomes over-developed to the detriment of the other towns.</li> <li>• Areas such as Chester-le-Street, Seaham, Newton Aycliffe, and Sedgefield are closely connected to Gateshead, Sunderland and Darlington respectively. Local labour markets are certainly not self contained, and these intersect with housing markets.</li> <li>• Whilst the updated Strategic Housing Market Assessment (SHMA) identifies that the county comprises one Housing Market Area, it also acknowledges the important interactions with other areas.</li> <li>• Durham City attracts a lot of residents from outside of the county, who then move within the county. The future population of Durham City is highly dependent on incoming residents, who are then likely to remain in the county during their lives. Durham City is a unique case within the county.</li> <li>• Co-operation with neighbouring areas over economic development and housing is essential.</li> </ul>	
Responses to main issues	
<ul style="list-style-type: none"> <li>• The Strategic Housing Market Assessment (SHMA) confirmed that County Durham is a Housing Market Area and is an appropriate geography for assessing housing needs.</li> <li>• The SHMA sets out an assessment of household moves developed from the 2011 census and identifies containment ratios of 80.7% (origin) and 81% (destination) which establishes County Durham as a self-contained housing market area in terms of movement. These findings are further corroborated with household survey evidence.</li> <li>• The SHMA has also reviewed travel to work information, noting that, 71% of County Durham's labour force both live and work in the county; and 82.2% of those working in County Durham live in the county. This also demonstrates high levels of self-containment.</li> </ul>	

**Question 3 - Do you agree that County Durham is a single Housing Market Area for developing housing needs? Please give reasons for your response.**

- The council has developed working groups with the Tyne and Wear authorities and those in Tees Valley, where we have our closest interaction. The council does engage in a continuous and ongoing basis with neighbouring authorities as part of the Duty to Cooperate.
- Following the publication of the Issues and Options document, the Government has subsequently consulted on and updated the approach to assessing housing needs and the standard methodology is to be applied on local authority boundaries and it is therefore considered appropriate to plan on this basis.

**Question 4 - Determining Housing Need (Objectively Assessed Housing Need)**

**Question 4 - Which population growth scenario do you prefer? Please give reasons for your response.**

- a. 1,533 houses per year;
- b. 1,629 houses per year;
- c. 1,717 houses per year; or
- d. None of the above, please suggest an alternative option.

Number of Representations in policy area	167
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**Summary of main issues raised by representations**

- Of the options presented, each was given some degree of support.
- 1,717 would provide the biggest boost to housing numbers, provide choice for housing and would increase working aged population in the County; would support housing for older people and affordable housing delivery; longer term migration patterns are preferable.
- 1,717 - reflects a more positive historic demographic picture not unduly influenced by more suppressed recent period; apply an adjustment to respond positively to younger people household formation being constrained; respond to market signals over time; ensure realisable labour force participation address affordable need.
- 1,717 to deliver affordable housing.
- The 1,533 scenario has been unduly affected by the economic downturn therefore b. and c. are preferred.
- 1,533 strikes the balance between aspiration and deliverability; reflects departure from EU.
- 1,629 Per year preferred - realistic and deliverable.
- None of the above - 1,900 per year is preferred.
- None of the above - 1,725 per year is preferred and is in line with PPG.

**Question 4 - Which population growth scenario do you prefer? Please give reasons for your response.**

- a. 1,533 houses per year;**
- b. 1,629 houses per year;**
- c. 1,717 houses per year; or**
- d. None of the above, please suggest an alternative option.**

- None of the above - 1,400 per year is preferred.
- None of the above - 2,000 per year is preferred.
- 1,629 Per year preferred - longer term migration trends are appropriate.
- None of the above - 1,800 - 1,900 is preferred, based on use of an OBR economic activity rate and an approach to address household suppressing inherent in 2012 based formation rates.
- None of the above - Population cannot be controlled or predicted. Market signals indicate no adjustment needed therefore 1,371 is appropriate.
- None of the above - further information needed on demographics and University expansion.
- None of the above - 1,329 per year is preferred there is no reason to go above the 'starting point'.
- None of the above - Natural change is a preferred scenario - migration is not likely from outside areas into County Durham.
- None of the above - 2,250 market dwellings should be delivered to ensure delivery of affordable homes to meet need.
- None of the above - 1,725 - the plan should boost significantly the supply of housing ; plan for a scenario which allows for the catch up of younger households; accommodated for jobs growth and deliver affordable housing.
- None of the above - The Edge Analytics headship rate return should be applied therefore, scenario a would equate to 1,617, scenario b: 1,712 and scenario c: 1,801.
- None of the above - 1000 homes or less. there is no link between population and prosperity.
- None of the above - fewer houses should be required than suggested. Para 3.1 of Issues and Options notes majority of households seeking to move house look for another house within the county. this implies population growth will be based mainly on a higher birthrate than death rate or a decrease in persons per household.
- Increase of residents in areas of employment can be offset by reducing increases in areas which are not centres of employment.
- Population growth should be considered at a more localised scale.

**Question 4 - Which population growth scenario do you prefer? Please give reasons for your response.**

- a. 1,533 houses per year;**
- b. 1,629 houses per year;**
- c. 1,717 houses per year; or**
- d. None of the above, please suggest an alternative option.**

- An assessment of economic growth and market signals should be undertaken and this should be revised when guidance is published.
- The proposed scenarios are higher than past completions.
- Forecasts are over estimated - this could result in over-development.
- None of the above - less than 1,500. infrastructure should determine the number of units.
- None of the above. There is uncertainty about migration (brexit) therefore it is not appropriate to consider past immigration trends.
- None of the above - they are based on outdated population statistics.
- None of the above - the family unit is getting smaller with fewer children, therefore population growth is slowing down.
- None of the above - the projections for household growth are too high.
- None of the above - there is no need for housing as empty homes in Durham City aren't being sold. Impose on Durham University that all students should have access to accommodation which would free up homes.
- None of the above - 1,000 homes per year should be sufficient.
- None of the above - The more recent 2014 based projections should be used.
- No link between population and jobs.
- The long term option will have greater negative impacts upon local character and historic interest.
- There is confusion between demographic projections and employment projections - they are not projections just a wishes for an amount of growth.
- The 2014 based projections are broadly similar to 2012 projections.
- Questions raised on edge report and migration assumptions with neighbouring authorities, commuting and jobs growth.
- The Market Signals assessment in the SHMA should be taken over a longer time horizon.
- Alternative Headship rates as modelled within the Edge Analytics report should be considered.

**Question 4 - Which population growth scenario do you prefer? Please give reasons for your response.**

- a. 1,533 houses per year;**
- b. 1,629 houses per year;**
- c. 1,717 houses per year; or**
- d. None of the above, please suggest an alternative option.**

- The difference between the 3 scenarios is minor - many homes already have planning permission.
- Build as few houses as possible each year to monitor for impact on infrastructure.
- Alternatives should be considered such as building in parts of the areas of the county that require regeneration not in Durham City or surrounding areas.
- The movement of students from Stockton to Durham should be considered.
- Housing not needed in villages around Durham City.
- More work needs to be done on housing needs including how many people are on housing waiting lists and in unacceptable accommodation.
- There is a shortage of specific types of housing: low cost development; Band A energy properties; private homes for single and two people; affordable homes; 'surrey housing'; passiv haus; housing for older people.; high quality housing in rural areas and old pit villages.
- More work is needed to understand specific types of housing need.
- Too many affordable homes, 'box housing'.
- Regeneration, demolitions and bringing unused housing back into use should be considered before new housing.
- The approach to determining overall housing need as set out in Issues and Options appears compatible with the approach used in the the Gateshead and Newcastle Core Strategy and Urban Core Plan.
- Housing numbers should be determined based on infrastructure.

#### **Responses to main issues**

- None of the three options or alternatives proposed have been taken forward into the Plan. The alternatives set out at Issues and Options were developed within the context of a methodology which has been superseded. None of the alternatives proposed are in line with the New Standard Methodology. The Government's New Standard Methodology to undertake a Local Assessment of Housing needs results in 1,368 dwellings per annum. In line with the guidance, this is applied over the Plan period resulting in a local housing need in County Durham of 25,992 (2016 -2035).

**Question 4 - Which population growth scenario do you prefer? Please give reasons for your response.**

- a. 1,533 houses per year;
- b. 1,629 houses per year;
- c. 1,717 houses per year; or
- d. None of the above, please suggest an alternative option.

- The scenarios and assumptions as set out in the Edge report have been superseded by the New Standard Methodology.
- The assessment of housing need is undertaken at a county level and does not take account of sub county factors.
- The assessment of housing need is unrelated to distribution.
- Houses with planning permission are known as commitments and are factored in as part of identifying a residual number for allocation.
- Infrastructure requirements linked to proposed housing development have been assessed and are set out in the Infrastructure Delivery Plan.
- The spatial strategy determines the approach to distributing development.
- The Plan contains policies on affordable housing; student accommodation and the appropriate type and mix of development.
- Affordable housing needs are considered within the Strategic Housing Market Assessment and a policy is in the Preferred Options to address housing needs.
- Considerations around unused stock and demolitions relate to housing supply side factors and the residual for allocation. These are considered separately from housing need.

**Question 5 - Employment Rate**

**Question 5 - Is the ambition to increase the employment rate to 73% as part of creating more and better jobs within County Durham realistic? Please give reasons for your response.**

Number of Representations in policy area	111
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**Summary of main issues raised by representations**

- The development of Hitachi, the UTC at Newton Aycliffe and other similar investments only go to show that this is a realistic figure.
- We should aspire to meet the national average.
- It relies on enterprise.

**Question 5 - Is the ambition to increase the employment rate to 73% as part of creating more and better jobs within County Durham realistic? Please give reasons for your response.**

- To Plan for less than the average for the Country would be to build on economic failure.
- Historic data suggests it is possible.
- Support an ambitious increase aligned to Northumberland's approach.
- It depends upon regional working.
- Ambitious but not unrealistic, it could be achieved through increasing rates of economic activity and reducing the unemployment rate.
- Ambitions are consistent with Government's drive for growth.
- 73% is not supported as the proximity to the national average was short lived.
- The increase in the age of the population will impact on this making it harder to achieve.
- Public sector cuts will impact upon this.
- What evidence is there that we can attract businesses.
- Too aspirational and unrealistic.
- Sources indicate employment rates to remain static or fall.
- The plan does not set out how this will be achieved.
- Brexit will impact upon this.
- It does not aim to reduce the unemployment rate of the current population, particularly women.
- A separate target for men and women required.
- Too ambitious and would artificially lower the housing requirement in an area.
- Make use of OBR assumptions.
- The assumption is based on a pre-recession figure.
- No evidence provided as to the extent to which this is reasonable or realistic.
- County Durham has never experienced this level of employment, even at the height of the boom years.
- Requires a substantial number of people to return to work.
- A revised figure based on regional averages would be more appropriate.
- The Sustainable Communities Strategy has issues.

**Question 5 - Is the ambition to increase the employment rate to 73% as part of creating more and better jobs within County Durham realistic? Please give reasons for your response.**

- The relative employment rates of men and women have diverged and the plan should address the failure of women's rates to recover.
- The age profile of the working age population has changed with more young people staying on in education and more people working after their 65th birthday.
- There are differences between parts of the county.
- The forecasting work notes the scale of change required in this context.
- The uplift to 73% requires a substantial number of people to return to work as a result of a fall in unemployment.
- Evidence is required on the type of jobs forecast to be created and that this aligns with labour force adjustments.
- Aspiration is supported, but evidence presented does not justify this figure other than that this is a County Durham Economic Partnership target.
- This represents a significant step up from the current figure.
- At the height of the boom County Durham was at 71% - unrealistic to expect this to be surpassed.
- 71% is a more realistic figure.
- 72% is more realistic and achievable.
- More realistic to maintain 67%.
- 70% is a more realistic figure based on the graph at para 3.6.
- The figure should be greater than 73%.
- 73% is an admirable aim whether achievable or not; it is a difficult target.
- 73% not supported as an assumption - too crude a measure it masks differences between genders and different parts of the country.
- Aim for 100%.
- Welcome ambition, but evidence needed to justify.
- A fixed target is not appropriate.
- Rate has fallen since the recession - this should be explained.
- Assumptions around the quality of jobs should be made; what constitutes 'better jobs'?
- It is desirable but, infrastructure should be in place to support this and it is important to support all people to seek employment opportunities.

**Question 5 - Is the ambition to increase the employment rate to 73% as part of creating more and better jobs within County Durham realistic? Please give reasons for your response.**

- Comments on jobs in the county: the jobs offered don't match the skills in the County; too many low skilled jobs; quality of jobs is important; more jobs in manufacturing needed; reduce unemployment for NEETs; consider impact of low wages; support and provide training for younger people; education and skills are important.
- Comments on the distribution of development: Provide employment development in attractive locations; remove emphasis from Durham City and A19 corridor; focus on areas with low employment; job creation across the County required; deliver ambition across the County and not just Durham City and Chester le Street; reduce the need to travel and carbon footprints; focus employment in main towns; distribution of jobs is important in order to understand impact on strategic road network; important to consider employment land allocations.
- Comments about forecasts: too disparate; is taking an average credible?

**Responses to main issues**

- The 73% employment rate assumption as set out at Issues and Options was proposed within the context of scenarios developed within the context of a methodology for assessing housing needs which has subsequently been superseded.
- The scenarios and assumptions as set out in the Edge report have been superseded by the New Standard Methodology.
- The Government's New Standard Methodology to undertake a Local Assessment of Housing needs results in 1,368 dwellings per annum. In line with the guidance, this applied over the Plan period resulting in a local housing need in County Durham of 25,992 (2016 -2035). There is no equivalent assumption around employment rate within the Plan.
- For clarification, the assumption was presented as county wide is unrelated to distribution, location of employment; or the type of job.
- For clarification, the job forecasts were independent of the 73% ambition.

**Question 6 - Windfalls**

**Question 6 - Do you agree that it is appropriate to include a windfall allowance for small sites less than 0.4 hectares (12 houses)? Please give reasons for your response.**

Number of Representations in policy area

99

**Summary of main issues raised by representations**

- The overwhelming majority of respondents supported the inclusion of a windfall allowance for small sites.
- Windfall sites are a useful contribution to meeting objectively assessed need.
- Windfall sites will help the plan deliver its objective of delivering a wide choice of high quality homes and providing a more varied type and mix of housing.

**Question 6 - Do you agree that it is appropriate to include a windfall allowance for small sites less than 0.4 hectares (12 houses)? Please give reasons for your response.**

- Developing small windfall sites will allow for continued and improved communities rather than the development of large estates such as Newton Hall.
- In rural areas windfall sites are possibly the only way that the sustainability of an area can be maintained.
- The redevelopment of brownfield windfall sites will reduce the need for greenfield sites .
- Small sites often are more easily assimilated into the community and will need to be sympathetic with the local area in terms of design.
- Small sites provide opportunities for small local builders and are also affordable for organisations such as registered providers to provide affordable housing.
- The windfall sites allowance should be subject to a development management policy which are supportive of windfall sites coming forward for development.
- The policy should allow site specific consideration of small sites less than 0.4 ha.
- Only if the money is spent in the area where the new housing is built.
- Windfall sites are outside of planning control.
- The unpredictability implied by provision of 'non allocated sites' seems to be at odds with a strategic document of this sort.
- The windfall sites allowance need to be justified by evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. However, compelling evidence is not currently available and at this stage no draft policies are available for consideration.
- The previous delivery of windfall sites should not be used as a marker for future delivery. The council has consistently fallen short of its house building targets since 2007/08 and the proportion of windfall allowance built into its five year supply should be less than 11%.
- A high windfall allowance should not be used to reduce the level of proposed housing allocations.
- The Plan should seek to identify its full housing allocation requirement through allocations and the windfall sites should be considered as a last resort when no further allocations can be identified.
- We would suggest the deletion of the housing yield. Twelve units on a 0.4 hectare site is based on a 100% development area of land at a density of 30 dwellings per hectare.
- Windfall sites could result in houses in inappropriate places and which are poorly designed.
- Windfall sites will require assessment under the Habitats Regulations where their location has the potential to have a likely significant effect upon a European designated site.
- Windfall sites in rural areas may result in problems with sewage treatment capacity in some instances.

**Question 6 - Do you agree that it is appropriate to include a windfall allowance for small sites less than 0.4 hectares (12 houses)? Please give reasons for your response.**

#### Responses to main issues

- The overwhelming support for the windfall allowance is noted. An allowance based upon the appropriate evidence has been included within the Plan.
- In assessing how much land needs to be allocated in the Plan for future housing needs the council considers that it is necessary to consider other potential sources of housing provision. This requires quantifying matters such as the number of houses which have planning consent but have not yet been built and the number of units which may be proposed on land not allocated in the future i.e. windfalls
- While the windfall allowance will affect the number of housing which are allocated, it will not in itself restrict appropriate larger scale housing proposals from being allocated which accord with policies of the plan.
- The windfall allowance relates to both previously developed and greenfield sites and the evidence referred to in 3.10 of the Issues and Options report relates to both typologies. However, the windfall allowance is not settlement or site specific, it is a numerical assumption.
- Generic policies are proposed in the plan to provide a framework for assessing windfall proposals to ensure that they are appropriate and sustainable.
- A threshold corresponding to 0.4ha has been adopted for housing allocations.
- A windfall allowance does not relate to a financial sum.
- Windfall sites will fall within planning control as they will have to conform with policies in the Plan to be accepted including policies relating to design.
- Government guidance is clear that a windfall allowance is appropriate in local plans where evidence exists to justify the approach.
- The council has evidence which confirms that smaller scale developments of under 12 units on unallocated sites have and will continue to make up a proportion of housing delivery over the plan period. Therefore the council considers it necessary to take this into account so as not to identify more housing land than is needed to meet future housing need.
- Strategic Housing Land Availability Assessment (SHLAA) Report 2016 sets out the methodology for the calculation of yields.
- The generic policies of the plan will provide a framework for determining windfall schemes to seek to safeguard against proposals in unsustainable locations which will ensure that all relevant matters are considered including matters such as ecology and infrastructure i.e. sewage capacity.
- The Plan makes provision for non allocated suitable sites to be considered. Furthermore, the Neighbourhood Plan process provides scope for suitable smaller sites to be allocated.

**Question 7 - Windfall allowance for large sites**

**Question 7 - Do you agree that there should be no windfall allowance for large sites over 0.4 hectares (more than 12 houses)? Please give reasons for your response.**

Number of Representations in policy area	99
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**Summary of main issues raised by representations**

- Many respondents agreed with the council's position.
- There should be no allowance for delivery of housing on large windfall sites. Certainty is needed and a large windfall allowance could undermine the Plan and Strategic Housing Land Availability Assessment (SHLAA) process.
- The Local Plan should contain housing allocations to deliver the housing requirement, large windfalls should not be relied upon.
- It is vital that the Plan identifies enough deliverable sites to meet objectively assessed need (OAN).
- Allowing large windfall sites will give developers the opportunity to develop sites which may have already been considered through the Strategic Housing Land Availability Assessment (SHLAA) process and discounted as unsuitable. It could also lead to large unsuitable or undesirable sites being developed in areas which would not benefit from large scale development.
- Whilst windfalls may have been brought forward from large sites in the past this was in the context of an ageing plan and did not have the benefit of the more detailed evidence base provided by the SHLAA.
- Once the Plan has been adopted, and sites have been allocated, it is likely that the number of successful applications for development on sites not allocated will decrease, as long as the Council is capable to demonstrate a five year supply of housing land throughout the plan period.
- Large windfall sites should be subject to full Planning procedures and decided on merit and need.
- It would be difficult to predict with any certainty the level of such suitable sites that may come forward. That said, the recognition that large windfall sites may well receive planning permission within the plan period is welcomed.
- Demolition and rebuilding on a site is a sensible way forward.
- Local identification of (otherwise) windfall sites exceeding 0.4 ha should be encouraged through the Neighbourhood Planning process.
- Larger sites have greater potential either individually or cumulatively to result in greater impacts from vehicle movements, which needs to be understood and planned for, in terms of potential infrastructure improvements and mitigation that could be required. This should be carried out as part of the Local Plan making process.

**Question 7 - Do you agree that there should be no windfall allowance for large sites over 0.4 hectares (more than 12 houses)? Please give reasons for your response.**

- We have concerns regarding windfall site allowances of any size where there is ambiguity as to location as this could impact upon planning for the disposal of waste water and impact upon the operation of sewage treatment works.
- There should be a monitoring and implementation policy which identifies clear triggers to allow consideration of unallocated sites when delivery fails to come forward in line with the strategy and housing trajectories. If necessary this could prompt an early review of the Plan.
- A large windfall allowance should be included within the Plan if there is evidence to demonstrate such a need (e.g. historic contributions). However, it is recommended that a prescribed unit threshold is not included within any policy.
- The reasons for including small windfall sites could be applicable to large windfall sites.
- The windfall allowance for small sites detailed in question 6 is reasonably justified by reference to historical data. It is inexplicable, therefore, that no comparative historical data is provided for larger sites. This historical data should be provided in relation to question 7 because without it it is unreasonable to make a judgement.
- The redevelopment of large windfall sites provides an opportunity to refurbish and redevelop tired areas. Every opportunity should be taken to re-use brownfield sites, which windfall sites generally are, and the continued demise of industrial sites should be recognised. Look at the Cape site in Bowburn, for example.
- Every case should be viewed in isolation so that development can be suited to the area suggested.
- Paragraph 48 of the National Planning Policy Framework (NPPF) makes no distinction between windfall sites below 0.4 hectares and those above 0.4 hectares. It simply states local authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- Windfall should be available for sites over 0.4 hectares especially in the rural areas.
- In some areas small industrial units should be built on the windfall sites to assist the economy, provide jobs in rural areas and help achieve the sustainability of the area.

**Responses to main issues**

- The support offered for not having a large scale windfall allowance is noted and is welcomed.
- Windfall allowance does not relate to financial matters.
- The council considers that in the interests of providing certainty there should be no windfall allowance for large sites over 0.4 hectares in the context of plan making.
- The Plan does not incorporate a windfall allowance for larger sites. In more recent years whilst there have been a significant number of large scale windfall sites granted consent this is symptomatic of the fact that the existing policy framework extends back to the 1990's. Future

**Question 7 - Do you agree that there should be no windfall allowance for large sites over 0.4 hectares (more than 12 houses)? Please give reasons for your response.**

reliance on large scale windfalls to deliver the OAN will undermine the plan strategy and will not provide sufficient certainty. However this figure is not a ceiling. The plan therefore acknowledges that there will be some delivery on unallocated sites and makes provision for the consideration of these.

- The Plan supports the reuse of previously developed land in the plan and identifies a number of housing allocations on such sites. However the council disagrees with the view given that a windfall allowance for large sites will result in securing certainty for further redevelopment opportunities on such sites in the context of plan making.
- At planning application stage it is agreed that a proposal should be considered on its own merits against relevant plan policies.
- The Plan includes a monitoring framework which addresses the points made in relation to review and monitoring of this policy.

**Question 8 Empty Homes**

**Question 8 - Is it appropriate to include an allowance of 50 units per year for bringing back empty properties into use in the housing supply? Please give reasons for your response.**

Number of Representations in policy area

97

**Summary of main issues raised by representations**

- The majority of respondents considered that the level proposed is appropriate or should be greater.
- There is no evidence to underpin the level proposed.
- If an empty homes allowance is to be incorporated into the housing land supply calculations it must be consistent with PPG3, specifically ensuring that empty homes have not been double counted within the existing dwelling stock.
- Past trends and outcomes should be used as a guide but don't dilute focus on key issues presented by empty homes.
- Bringing empty homes back into use is a means to regenerate areas, including areas such as Dean Bank Ferryhill.
- The council should encourage empty homes and surplus student accommodation to be brought back into use as there are advantages in doing so.

**Responses to main issues**

- The assumption of 50 houses has been taken forward in the Plan for the purposes of calculating the amount of land which is required for housing allocation purposes.

**Question 8 - Is it appropriate to include an allowance of 50 units per year for bringing back empty properties into use in the housing supply? Please give reasons for your response.**

- The allowance taken forward in the Plan has been derived from considering available evidence relating to historic trends and future funding opportunities. Past performance shows that on average, around 100 houses per year have been brought back into use. This is offset to some degree by those that have become long term vacant during the same period. Funding opportunities have declined in recent years and there is no certainty that they will resume in the future, the council therefore considers that an allowance of 50 units per year is a realistic assumption. The figure will be carefully monitored to ensure that it continues to be a reasonable assumption.
- This allowance does not prevent empty homes from being reoccupied or regeneration schemes from coming forward in the future where they are on allocated housing sites or accord with the relevant criteria.
- Planning Policy Guidance permits local authorities to include empty homes in their housing need calculations providing that the empty homes have not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans. The council have not counted existing empty homes in calculating the overall need for additional dwellings in accordance with the guidance.
- Bringing empty homes back in to use is a key priority for the council. The assumption taken forward is by no means a ceiling and does not seek to limit the number of homes which can be brought back into use in the future. We also recognise the issues experienced in some areas as a result of concentrations of vacant, underused properties and will continue to work with all relevant agencies and in particular Homes England to pursue funding that will allow as many properties as possible to be brought back into use.

**Question 9 - Demolitions**

**Question 9 - Is it appropriate to include an allowance of 50 per year for demolitions in the housing supply? Please give reasons for your response.**

Number of Representations in policy area

99

**Summary of main issues raised by representations**

- The majority of respondents who commented upon the actual allowance proposed offered support or agreed to the principle but considered that it should be higher for the purposes of calculating how much land needs to be allocated in the Plan.
- The council should use past trends and outcomes as a guide.
- It is difficult to see the basis for the allowance, it needs to be based upon robust evidence and carefully monitored.
- Empty and inadequate commercial properties also need to be tackled.
- There is a need to ascertain the cause and try to ensure it doesn't happen elsewhere. Whilst this is an obvious thing to do it is not a good way of spending money unless there are strategic development plans for the area,

**Question 9 - Is it appropriate to include an allowance of 50 per year for demolitions in the housing supply? Please give reasons for your response.**

- The council should show more ambition in increasing the level of demolition that takes place. there are many opportunities including Dean Bank Ferryhill and Ferryhill Station.
- Demolition should be the last resort.
- Replacement homes should be more energy efficient and affordable.

**Responses to main issues**

- The support for the principle of including an allowance is welcomed as is the support given to the level proposed. We acknowledge that demolition activity by both the council, registered social landlords other third parties needs to be carefully monitored to ensure that evidence is robust and up to date.
- If houses are not council owned then they may have to be purchased before they can be demolished. Although funding for future demolitions is uncertain it is likely that there will be further demolitions across the Plan period, particularly in areas of low demand. Past performance is therefore not necessarily a guide to the number of future demolitions given the changing funding climate and therefore the two need to be considered in conjunction with one another when projecting future trends.
- Sometimes where there is little or no demand for houses or they are in such poor condition that they are uninhabitable it is necessary to demolish them. This reduces the total stock. In light of this the purpose of this allowance is to assist in assessing how many new houses the Plan needs to make provision for.
- The allowance taken forward in the Plan is not intended to preclude regeneration of older housing stock by setting a ceiling. It is calculated having considered the most up to date available evidence relating to past trends and known funding opportunities.
- The Plan makes provision for sustainable housing proposals on allocated and unallocated sites and acknowledges the contribution previously developed sites can have in the regeneration of the county. This allowance does not prevent regeneration schemes from coming forward in the future where they are on allocated housing sites. The council is committed to working to improve the quality of the housing stock across the county within the parameters available to it through working with partners and supporting bringing empty homes back into use, regeneration of existing stock and in some instances clearance.
- The Plan includes policies to ensure that new homes are energy efficient and schemes contribute to the supply of affordable housing.

### Spatial Distribution of Development (Where)

#### Question 10 - Factors influencing the options for the plans spatial strategy

**Question 10 - Do you agree that these factors (sustainability, impact on economic growth, viability and delivery, efficient use of land) are the most important when considering the options for the Plan's spatial strategy or are there others? Please give reasons for your response.**

Number of Representations in policy area	133
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#### Summary of main issues raised by representations

- General support for each of the factors listed.
- Support for the effective use of land and maximising the use of brownfield land rather than greenfield unless there is some ecological value on the brownfield land.
- Houses which are unoccupied should, wherever possible, be brought back into use.
- There should be reference to maintaining the Green Belt around Durham City and locating development where it would not impact on the Green Belt.
- The need for employment land should be based on a realistic assessment of needs and should be in appropriate locations.
- A further factor should be added relating to female employment rates.
- The Plan should encourage development away from more expensive areas of the county.
- New development needs to be supported by sufficient infrastructure and services including sewerage treatment, education, social, sporting, health, recreational and cultural facilities.
- The re-use of land in town centres should be encouraged.
- Development should be located near existing services and where sustainable transport possibilities can be realised.
- Housing should be located where it supports economic growth and maintains existing businesses.
- New housing should be located in areas where there are few jobs and poor quality housing to reverse inequalities and encourage regeneration.
- New housing and employment opportunities should be provided in locations where people wish to live and companies want to invest.
- A meaningful level of growth should be apportioned to our rural settlements.
- An additional factor relating to the vitality and vibrancy of communities should also been taken into account.
- Young people are priced out of new homes as developers are more focused on buyers with a much higher income, so the probability of purchasing a home reduces accordingly.

**Question 10 - Do you agree that these factors (sustainability, impact on economic growth, viability and delivery, efficient use of land) are the most important when considering the options for the Plan's spatial strategy or are there others? Please give reasons for your response.**

**Responses to main issues**

- The Plan includes an objective for the effective use of land and the starting point for allocations was to utilise brownfield land wherever possible before considering greenfield.
- Bringing empty homes back in to use is a key priority for the council and we will continue to work with all relevant agencies and in particular Homes England to pursue funding that will allow as many properties as possible to be brought back into use.
- The need for employment land is set out in the Employment Land Review and based on a nationally recognised methodology.
- The Plan seeks to focus development around the towns where the greatest opportunities for employment, services and facilities, public transport and other infrastructure exist but also to places where there is the best chance of it being delivered.
- Policies in the Plan require a 'town centres first' approach to the location of main town centre uses, including supermarkets, thereby positively promoting competitive town centres. New housing in town centres is also encouraged where appropriate.
- Locating housing where it can support existing and emerging job opportunities underpins the spatial strategy.
- The council attaches great importance to the Green Belt. However, and as required by the National Planning Policy Framework (NPPF) we believe there are exceptional circumstances which justify the removal of some land from the Green Belt.
- Regeneration is a key priority of the council and the Plan but it must be balanced with meeting the needs of our communities including ensuring that development is located where people want to live and businesses want to invest to ensure it is actually delivered.
- Policies in the Plan support development that meets the needs of rural communities such as housing, including affordable, and economic diversification, provided the countryside is protected from wider development pressures.
- The Plan supports development that will meet identified needs in order to secure balanced communities and allow them to become more sustainable and resilient and promote social cohesion and economic vitality.

**Question 11 - Distribution of Employment**

**Question 11 - Do you agree that it is appropriate to focus on the most attractive economic market areas? Are there any alternative approaches that could be used? Please give reasons for your response.**

Number of Representations in policy area	146
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**Summary of main issues raised by representations**

**Question 11 - Do you agree that it is appropriate to focus on the most attractive economic market areas? Are there any alternative approaches that could be used? Please give reasons for your response.**

- The importance of the A19 Corridor should be recognised in the Plan.
- It is right to focus on the most attractive markets.
- Focusing on the most attractive markets should not be at the expense of less attractive areas. All areas within the County should be recognised as important, growth should be dispersed across the County.
- Concern that too much emphasis is placed on Durham City.
- More focus should be on Durham City.
- Sedgefield could support more economic development.
- Rural areas should have a level of economic growth.
- Potential to focus growth around existing further/higher education establishments.
- Focusing employment allocations on less desirable areas leads to an oversupply of land with very low take up.
- The A1 Corridor and the potential of Aycliffe should be recognised.
- Road infrastructure and public transport provision should be a key consideration.
- Potential to utilise the East Coast Mainline when considering economic markets.
- Important that new housing is located within proximity to employment land.
- Importance of Barnard Castle and GSK should be recognised.
- Potential of Ferryhill and the reinstatement of the Leamside Line should be recognised.
- Industrial sites should be developed alongside railways.

**Responses to main issues**

- The evidence recognises that the A19 Corridor is considered to be one of the county's prime industrial locations.
- The evidence identifies the more attractive areas as the A1 Corridor, Durham City and the A19 Corridor.
- The plan will continue to allocate land and protect existing employment sites in perceived less attractive areas. A strategy that diverts from allocating land in locations which are more attractive to the market may reduce opportunities for further investment.
- Whilst Durham City is recognised as an attractive market, the levels of employment allocations within the city will be below settlements such as Newton Aycliffe.

**Question 11 - Do you agree that it is appropriate to focus on the most attractive economic market areas? Are there any alternative approaches that could be used? Please give reasons for your response.**

- Durham City is recognised as an attractive market with excellent transport links, it will therefore be a focus for employment land allocations, including a Strategic Employment site at Aykley Heads.
- Sedgefield is located within the A1 Corridor and sites such as NETPark will play a significant role in the future land supply for County Durham.
- The Plan will allocate land and protect existing employment sites in rural areas.
- Locations such as Newton Aycliffe where the UTC is located play a significant role in the supply of employment land over the Plan period.
- There is evidence of low take up of employment land in less attractive areas, the evidence recognises that historic land allocations should not be taken forward in the Plan.
- Newton Aycliffe will play a significant role in the supply of employment land over the Plan period.
- Durham City is identified as a strong economic market and this is reflective of the city's location on the East Coast Mainline. Public transport and road infrastructure therefore are a key consideration in allocating land.
- Whilst employment land allocations are not wholly dictated by new housing, the areas of new employment allocations are well located in relation to proposed housing growth areas.
- The evidence recognised that GSK represents a major international occupier within Barnard Castle. The plan will continue to protect the site and allocate sufficient land to meet the needs of the local market.
- Ferryhill is located within the A1 Corridor and Dean and Chapter Industrial Estate will be protected within that. The reinstatement of the Leamside Line could provide potential for further growth.
- The council recognises the importance of railways to industrial and business development and this is one reason for the redevelopment of the Aykley Heads site for office development.

**Distribution of Retail**

**Question 12 - Call for Sites**

**Question 12 - Should evidence show they are required, are you aware of any site that should be considered for allocation for food and non-food retail? Please refer to the Call for Sites document(xvi) for detail on what information is required.**

Number of Representations in policy area	48
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**Summary of main issues raised by representations**

- Local traders in Durham City are suffering because of out of town retail.

**Question 12 - Should evidence show they are required, are you aware of any site that should be considered for allocation for food and non-food retail? Please refer to the Call for Sites document(xvi) for detail on what information is required.**

- Potential for food and non food retail in Newton Aycliffe, sites considered suitable within the town.
- Emphasis should be on leisure, antiques, coffee shops, restaurants, arts and crafts as the trend of online shopping increases.
- Suggestions for new retail provision were put forward for:
  - Willington
  - Durham City
  - Crook
  - Stanley
  - Bowburn
  - Auction Mart, Barnard Castle
  - St Helen's Trading Estate, Bishop Auckland
  - Esh Winning
  - Chester-le-Street
  - Newton Aycliffe
  - Spennymoor (the redevelopment of Festival Walk)
  - Ferryhill
- North Road and Claypath should be primarily retail.
- The Plan should signal an intention to reverse its historic approach to out-of-town retail, and only allocate land for retail of bulky goods outside of town centres. All other retail, in particular food and small goods, should be located within town centres.
- In the age of internet shopping and click and collect stock reductions, there is no need for more shopping provision and there must be a commitment to take shop space out of use permanently and change it to other uses for example housing.

### Responses to main issues

**Question 12 - Should evidence show they are required, are you aware of any site that should be considered for allocation for food and non-food retail? Please refer to the Call for Sites document(xvi) for detail on what information is required.**

- The Plan will protect the role of Durham City Centre at the top of the retail hierarchy. Any proposals that threaten the role of the city centre will be resisted.
- The Retail and Town Centre Study did not identify an immediate retail need that would require a site to be allocated within the Plan. The Plan will however be supportive of proposals that protect and improve the vitality and viability of the following centres:
  - Willington
  - Durham City
  - Crook (the improvement in provision in Crook with a new Lidl store and an approved Aldi store at Queens Street is acknowledged)
  - Stanley
  - Bowburn (the site has planning permission and is therefore not allocated)
  - Barnard Castle
  - Esh Winning
  - Chester-le-Street
  - Newton Aycliffe
  - Spennymoor
  - Ferryhill
- The Retail and Town Centre Study did not identify an immediate need to allocate sites for leisure uses. In coming to these conclusions national retail trends (including internet retail growth) have been considered.
- The Plan defines Primary Retail Frontages to retain a predominant retail character in those areas.
- The Plan will aim to protect town centres by encouraging new retail development to be located in town centres in the first instance. Retail development that is proposed outside of defined centres will be required to undertake a sequential and impact assessment in accordance with the NPPF.
- The Plan acknowledges that in some cases new residential uses within town centres may be appropriate and allows it to be supported where it accords with other relevant policies.

## Distribution of Housing

### Question 13 - Distribution of Development

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

Number of Representations in policy area	289
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#### Summary of main issues raised by representations

##### **a. Main Town Focus**

- Just under 10% of respondents who expressed a preference chose this option.
- Would cause traffic chaos and put pressure on local services.
- Large areas of the Green Belt would be built on and it would stifle regeneration in the county as a whole.
- Would deliver more houses as many of the surrounding villages, especially in East Durham, have a lot of existing houses already on the market that are taking time to sell.
- Durham City has the best developed infrastructure and is a key location for employment.
- Would cause unacceptable harm to the setting of the World Heritage Site.
- Over-concentration at Durham City at the expense of badly needed investment elsewhere in the county.
- Too much housing in the immediate Durham area, not balanced by employment and business opportunities or a transport system.
- Reduces the carbon footprint including congestion on smaller roads and the need to travel.
- Helps to maintain village sizes and identities without overwhelming them with unwanted development.
- Would concentrate houses in areas where they are the most desirable.
- Most sustainable option in transport terms and therefore reduces the need to travel by private car.

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

- Will inflate land prices and competition for land, affecting viability.
- Will safeguard the long term viability and sustainability of the University.
- Will exacerbate existing inequalities across the county.

**b. Sustainable Communities**

- Almost a quarter of respondents who expressed a preference chose this option.
- Can help support existing social and community infrastructure, including pubs, particularly in rural areas.
- Looks to be the fairest and most balanced approach.
- Is the only sensible option which gives a reasonable distribution for both living and employment opportunities.
- It is important to not just sustain the major towns but have a balance across the county.
- Would deliver a balance of housing across the county, taking into account the most sustainable locations, market attractiveness, where people want to live, and the reality of land values, house prices and the need for and prospects of regeneration.
- Highly sustainable pattern which directly addresses the critical need for employment opportunities to be near  
where people already live so that female activity rates can improve.
- Would be acceptable only if no deletions of Green Belt are involved.
- Will place an unacceptable pressure on Durham City.
- Would be more economical, easier to attract investment and infrastructure already exists.
- Would help keep carbon footprints to a minimum and reduce overall pollution.

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

- Sustainable Communities is considered to be a misnomer and could be interpreted as property developers' PR speak.
- Recognises the unique potential for Durham City as a national and internationally recognised city with employment, culture facilities and good transport links to drive the development of County Durham as a whole.
- If we want to use Durham City as a future commercial centre, we need housing near there.
- No evidence that it would provide economic or social resilience.
- The existing Durham City Green Belt is geographically restrained so any major increase in population  
would have to come from increasing densities that would run contrary to the aesthetic of the city.
- Support the option but with more development in North Durham.
- Reduces the need to travel by locating homes close to existing facilities and services.
- Distributes growth in a sustainable pattern relative to a settlement's role and function, capacity to accommodate growth, market attractiveness and sustainability.
- Clear need for Durham City, as the most sustainable settlement in the county, to accommodate suitable levels of growth to meet housing needs and support economic growth.
- Recognises the contribution that rural areas can make to the economy.
- The distribution of development further from the centres of employment in and around Durham City and the other  
main settlements of the North East will lead to longer commuting distances.
- Appears to consider the whole county taking into consideration sustainability, market attractiveness, community desires and viability in respect of housing prices/land value.
- Would address the identified supply and demand imbalances and current market pressures through a focus of development within Durham City but not at the expense of other settlements.

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

**c. Sustainable Communities with Central Durham Villages**

- Just over 5% of respondents who expressed a preference chose this option.
- There has already been too much development in Coxhoe.
- Some villages such as Lanchester can not cope with huge housing estates being built because of parking, flooding and school spaces.
- Would require much better cycle routes.
- Would ease the pressure on Durham City as it is a centre of historic interest which should be preserved.
- Scope for more beneficial regeneration, however, some of the villages have now reached their physical limits.
- The un-deliverability of this option provides the exceptional circumstances justifying limited changes to the Green Belt.
- Has good access to major roads and is close to future major job sites and would ease the pressure on the Green Belt.
- Would inject much needed money into the villages which would improve the infrastructure and standard of living.
- Most employment would not be in the local villages and people would have to travel to their place of work causing more traffic.
- Bearpark and Ushaw Moor contain a range of shops, services and facilities and have good bus links into the city centre.
- Will result in significantly more travel with its adverse environmental impact.
- Will fail to focus on the county's strongest housing market areas.

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

- Would encourage the development of affordable housing.
- Would support the vitality and vibrancy of many more existing settlements.

**d. Wider Dispersal**

- Just over half of respondents who expressed a preference chose this option.
- Would give opportunities for development of employment and activity in other parts of the county.
- Will have little or no impact on the Green Belt land yet still provide homes in areas that require regeneration.
- Would relieve the traffic pressure on the main centres of population and obviate the need for major road construction/improvements.
- Lower land values in these outlying areas (as opposed to Durham City, Chester-le-Street etc) would lead the building of cheaper, more affordable housing.
- Would have no impact on the historic core of Durham City.
- Would allow the use of more brownfield land.
- By enhancing local communities you open up the opportunity for small businesses to grow and prosper.
- Dubious about focusing on the wider dispersal as people may not want to reside in the countryside/rural area.
- Housing should be focused around Barnard Castle and Startforth.
- Housing should be focused in Consett and Stanley together with economic regeneration.
- Is too dispersed and would raise grave concerns over deliverability as well as sustainability.

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

- By minimising the need for significant infrastructure spending, it allows time for changes in working practices and technology to mature which may then reduce traffic and commuting.
- It might help to decrease air/traffic pollution by enabling people to find employment near their homes.
- Places most growth in the south of the county, where there is a desire to grow.
- There is significant potential for housing development located close to Durham's border with Gateshead to increase levels of outward commuting causing congestion.
- Smaller sites spread around the county can be more easily accommodated within the environment.
- Will result in significantly more commuting with its adverse environmental impact.
- Might result in the regeneration of poor communities across the county.
- Enables a move towards truly sustainable transport and greater levels of local sustainability.
- Will fail to focus on the county's strongest housing market areas.
- The Durham City proportion should be increased slightly in this option.
- Ensures that communities across the county will benefit from future development.

**e. None of the above, an Alternative option.**

- Just over 5% of respondents who expressed a preference chose this option.
- Support an amalgam of options b, c and d. This would assist in the regenerative process being effective in towns and villages currently felt 'left behind' or considered to be 'under-performing'.
- None of the options direct enough housing to East Durham.
- An option between b and c should be considered as it would reduce the impact on the Green Belt and would use more brownfield sites.

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

- Merging options a and b would benefit the county whereas c and d are unsustainable given the location of employment and transport.
- Create a new garden city near the Durham coast.
- A compromise between options b and c with less Green Belt deletions would be most appropriate.
- There should be more development in north and north west Durham.
- Create a new town in Central Durham based on one of the existing villages.
- New housing should be sited and built with older people in mind.
- The distribution to West Durham should be higher.
- A combination of a and b will ensure that development is focused on the locations that are best placed to accommodate growth.
- A variation on Main Town Focus but with less in Durham City and more in South Durham.
- A new settlement nearer to the A66/A1 between the A1 and the Barnard Castle area.
- More housing should be located in:
  - Lanchester
  - Sedgefield
  - Chilton
  - Great Lumley
  - Seaham
  - Wolsingham
  - Newton Aycliffe
  - Ferryhill

**Question 13 - Considering the Implications of each option, please specify which you prefer and please give reasons:**

**a. Main Town focus**

**b. Sustainable Communities**

**c. Sustainable Communities with Central Durham Villages**

**d. Wider Dispersal; and**

**e. None of the above. please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.**

**Responses to main issues**

- The council's full response to this question is set out in the Distribution of Housing section in the Plan and the supporting Spatial Strategy Justification document.

**Question 14 Exceptional Circumstances to justify green belt deletions**

**Question 14 - If you have chosen one of the first three options listed above, what are the exceptional circumstances to justify any Green Belt deletions? Please give reasons for your response.**

Number of Representations in policy area	111
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**Summary of main issues raised by representations**

- The majority of respondents suggest there are exceptional circumstances to just Green Belt release, these comments particularly focus around Durham City. The exceptional circumstances proposed include:
  - Ability of Durham City to fulfil its economic potential and have the ability to compete with cities in the north east;
  - The need to retain talented young people in the area and a vibrant workforce;
  - The provision of affordable housing in Durham City to support key workers amidst concern of a growing affordability issue within the city;
  - Placing housing in optimal locations for public transport opportunities; and,
  - The ability to meet housing need and to maintain a five year land supply.
- Green Belt deletions should be avoided unless opportunities for the redevelopment of previously developed sites and other other opportunities have been exhausted. Green Belt deletion should be a last resort.
- Amendments to the Green Belt should be considered beyond the plan period by considering safeguarded land.

**Question 14 - If you have chosen one of the first three options listed above, what are the exceptional circumstances to justify any Green Belt deletions? Please give reasons for your response.**

- If Green Belt has to be deleted then it should be replaced by nature reserves and forests. In addition Green Belt is important for healthy lifestyle opportunities.
- Any Green Belt deletions should only enable high quality and well designed development.
- Any Green Belt deletion must not negatively impact on the historic core of the city or the World Heritage Site.
- The existing Green Belt has fulfilled its purpose by directing development to the surrounding villages which has had physical and social benefits.

### Responses to main issues

- Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Exceptional circumstances believed to exist are:
  - Provide the right type of housing to meet the needs and aspirations of existing and future residents and a housing stock which supports the economy of the county and the need for more and better jobs.
  - Ensure sustainable patterns of development are achieved by building on Durham City's position as the county's employment centre, regional transport hub and regional centre for services and facilities, such as secondary schools and health facilities. This would provide greater opportunities to achieve locational sustainability and secure social, economic and environmental improvements compared to a more dispersed housing distribution.
  - Maximise the number of journeys undertaken by sustainable means such as walking, cycling and public transport and minimising overall journey distances and times. This will help address congestion and associated issues such as air quality and carbon emissions.
  - Help address economic under-performance across the county by helping to support the economic potential of Durham City and the delivery of Aykley Heads by capture business and investment growth, retain graduates and create opportunities to increase and retain consumption spending in the city, supporting an improved retail offer including reducing the impact of the fluctuation in population between University terms.
  - Maximise the delivery of affordable housing and other infrastructure which supports the delivery of jobs and housing, as a result of viability and delivery constraints which prevent the delivery of sufficient funding elsewhere in the county.
- The Exceptional Circumstances Note ensures that all reasonable options for meeting its identified need for development have been considered including: suitable brownfield sites and underutilised land; optimising densities; and been informed through discussions with neighbouring authorities.
- There is currently no evidence to suggest that land will be required in order to meet longer-term development needs stretching well beyond the Plan period.

**Question 14 - If you have chosen one of the first three options listed above, what are the exceptional circumstances to justify any Green Belt deletions? Please give reasons for your response.**

- The Sustainable Urban Extension policy sets out where compensatory improvements to the remaining Green Belt will be required to ensure there are environmental net gains and opportunities for healthy living.
- The Sustainable Urban Extension policy will require design codes to ensure distinctiveness and high quality design outcomes. The Sustainable Design in the Built Environment policy will seek to ensure that new development will be to a high standard across the county.
- One of the five purposes of the Green Belt is the preservation of the setting of historic towns which has been given full consideration in the Green Belt Assessment and the Exceptional Circumstances Note regarding site selection. The sites preferred will not negatively impact on the historic core of the city or the World Heritage Site.
- Significant regeneration efforts to re-stabilise the county's economy resulting from the spatial legacy of the industrial past, have had only localised success despite significant financial support from Government. The focus for this support for economic development has, in the past, been the most deprived areas of the county. The council is now seeking a more strategic approach to addressing economic challenges across the county.

**Question 15 - Call for sites**

**Question 15 - Are you aware of any sites that should be considered for allocation for housing? Please refer to the Call for Sites document (xviii) for detail on what information is required.**

Number of Representations in policy area	219
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**Summary of main issues raised by representations**

- A number of sites were submitted which have not been previously assessed through the Strategic Housing Land Availability (SHLAA) process.
- Further information and/or alterations to site boundaries were submitted for sites that were already in the SHLAA.
- Concern that use of settlement boundaries will constrain expansion and lead to a decline in infrastructure.
- Priority should be given to previously developed sites.

**Responses to main issues**

- Each new site has been included within the 2018 SHLAA and assessed using the methodology set out in the SHLAA Report.
- Where new information or a request for a site boundary to be amended has been submitted the SHLAA has been amended accordingly and the implications of this on the previous suitability call have been assessed.

**Question 15 - Are you aware of any sites that should be considered for allocation for housing? Please refer to the Call for Sites document (xviii) for detail on what information is required.**

- The housing allocations proposed and the methodology used for the selection process are set out in the Plan.
- The Plan is not proposing settlement boundaries. Applications for sites which are not allocated within the Plan will be determined using the Unallocated Sites in Built Up Area's policy together with any other relevant policies.
- The housing site allocation methodology gives priority to previously developed land. In addition the council have a brownfield register which details the previously developed sites where the principle of development for housing is accepted.

## Building a strong competitive economy

### Question 16 - Specific Use Employment Sites

**Question 16 - Is it appropriate to identify some employment sites that are only suitable for a particular type of employment use, for example research and development, and are therefore not available for general employment use? Please give reasons for your response.**

Number of Representations in policy area

47

#### Summary of main issues raised by representations

- Appropriate to identify sites for specialist purposes.
- Concern that restricting certain sites may limit potential investment in the county.
- Need to exploit local knowledge and skills by encouraging small scale start up in existing villages and premises.
- Key sites should be preserved and developed for Research and Development.
- Support for Research and Development at NETPark.
- Any policy needs to confirm whether it covers mineral and waste industries.
- Important to maximise links to Durham University.
- Research and Development should not just be restricted to NETPark.
- Consideration given to allocating sites at Tanfield Lea, Greencroft, Meadowfield, Langley Moor and Durham Gate for specific uses.

#### Responses to main issues

- The evidence identifies that NETPark is allocated specifically for knowledge based Research and Development (Use Class B1b) and therefore supports specialist use sites.
- Outside of the Specialist Use sites, the Plan will provide a suitable suite of employment sites that will exploit local skills and knowledge and be attractive to potential investors.
- The allocated Specific Use sites do not cover employment in minerals and waste industries.
- It is noted that the Durham University Research Institute is located on NETPark.
- Sites at locations such as Tanfield Lea, Meadowfield, Langley Moor and Durham Gate will be allocated as general employment sites allowing more flexibility in terms of end users.

## Question 17 - Aykley Heads Employment Site

**Question 17 - What should be the extent of the proposed Aykley Heads Strategic Employment Site?**

- a. Only reusing existing land currently used for employment, excluding any Green Belt land;**
- b. As above but also including land at County Hall car park currently in the Green Belt;**
- c. As above but also including former police leisure centre and playing fields currently in the Green Belt; or**
- d. As above but only use Green Belt land when other areas have been redeveloped.**

**Where relevant please set out the exceptional circumstances that exist to justify the removal of some Green Belt land? Please give reasons for your response.**

Number of Representations in policy area	109
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**Summary of main issues raised by representations**

- The majority of respondents indicated a preferred option:
  - Option a - 65%
  - Option b - 15%
  - Option c - 17%
  - Option d - 3%
- No justification/exceptional circumstances for removing land from the Green Belt at the site.
- Development should include the County Hall car park that is currently within the Green Belt.
- Green Belt should only be developed on when other areas have been redeveloped.
- Tree coverage and screening should be retained on the site where possible.
- The site is located in a strong market area and there is confidence that it can be an attractive location for businesses.
- Important that the environmental constraints of the site are understood.
- Site benefits from good strategic transports links offered by its location within proximity of the station and the A1(M).
- The Plan should ensure that sufficient land is made available for employment growth at Aykley Heads.

**Responses to main issues**

- The Plan reflects option b. The Exceptional circumstance to justify Green Belt deletions at the County Hall car park are the unique economic opportunities a strategic site in this location would bring in terms of more and better jobs, and that the attractiveness of the site would be enhanced by closer links to the city centre that the development of the car park would provide.
- Whilst the car park is within the Green Belt, it is a clear urban use and although development would impact on this, there are clear opportunities for enhancing approaches into the city centre through office development.
- A masterplan has been produced for the site that will seek to retain much of the existing planting and tree coverage on the site.
- Evidence has highlighted the locational advantages of the site. The Employment Land Review identifies Durham City as the key office location within the county.

**Question 17 - What should be the extent of the proposed Aykley Heads Strategic Employment Site?**

- a. Only reusing existing land currently used for employment, excluding any Green Belt land;
- b. As above but also including land at County Hall car park currently in the Green Belt;
- c. As above but also including former police leisure centre and playing fields currently in the Green Belt; or
- d. As above but only use Green Belt land when other areas have been redeveloped.

**Where relevant please set out the exceptional circumstances that exist to justify the removal of some Green Belt land? Please give reasons for your response.**

- A significant amount of work has been undertaken through the masterplanning process to understand the constraints of the site including the environmental constraints.
- The Plan allocates land for development of the site, whilst further land will be made available through the demolition of County Hall.

**Ensuring the vitality of town centres**

**Question 18 - Retail Impact Assessment Threshold**

**Question 18 - Should we have a higher or lower threshold for impact assessment than the default threshold of 2,500sqm in Government guidance? Please give reasons for your response.**

Number of Representations in policy area

36

**Summary of main issues raised by representations**

- A lower threshold should be in place.
- The threshold should remain at 2,500sqm.
- Need to guard against inappropriate development in out of centre locations.
- Need for a more robust approach to out of centre retail development placing a moratorium on all out of centre retail development with the exception of bulky goods.
- Should be considered on the needs of individual areas as one size fits all approach may not be appropriate.

**Responses to main issues**

- The Retail and Town Centre Study identifies that the food retail threshold for main towns in the county should be 1,500 sqm gross, it has also considered a comparison goods impact threshold for main towns of 1,000 sqm. In considering impact thresholds for smaller centres, given that they predominantly serve a top up function, a lower impact threshold of 400 sqm gross for convenience and comparison was identified.

**Question 18 - Should we have a higher or lower threshold for impact assessment than the default threshold of 2,500sqm in Government guidance? Please give reasons for your response.**

- The introduction of a locally set threshold allows the impact of proposed out of centre retailing on town centres to be fully assessed.
- National guidance does not allow to completely restrict out of centre development however with a local threshold in place the Council are in a stronger position to resist development that would adversely impact on town centres.

**Supporting a prosperous rural economy**

**Question 19 - Affordable Housing Exception Sites**

**Question 19 - In order to ensure the delivery of affordable housing where there are issues of viability, is it appropriate to allow some market housing on exception sites? Please give reasons for your response.**

Number of Representations in policy area

80

**Summary of main issues raised by representations**

- There is a need for rural communities to be sustainable.
- Support for the majority of exception sites to provide for the provision of affordable housing but accepting that it may be appropriate to allow some general market housing to ensure viability.
- There are alternative opportunities to improving the viability of schemes in addition to social renting (shared ownership, discounted sale, living rents, equity loans).
- The development of council owned land to meet affordable housing needs should be considered.
- However there was some more limited concern that by allowing some general market housing this would provide a 'loophole' for development on land which should not be developed.
- There needs to be sufficient safeguards to ensure that the essential characteristics of rural communities are not impacted upon for example through landscape, house design or locational siting requirements.
- Evidence will be required regarding what constitutes 'affordable'.
- As well as taking an approach which focuses on the ability of young, working families to enter the housing market, there should be provision for the ageing population.
- The policy should include an exact figure of 65% of housing to be affordable and 35% of housing to be general market housing.
- Public consultation should be undertaken in advance of any proposals.
- Businesses and job opportunities are important in rural areas.

**Responses to main issues**

**Question 19 - In order to ensure the delivery of affordable housing where there are issues of viability, is it appropriate to allow some market housing on exception sites? Please give reasons for your response.**

- County Durham has substantial rural areas, which are characterised by villages, hamlets and isolated dwellings, particularly in the west. There may be circumstances where affordable housing and employment related development is needed in these areas but can only be delivered by permitting development in the rural areas.
- The policy approach generally accepts that any scheme proposed should consist entirely of affordable housing. In some circumstances, an element of market housing may be acceptable, provided that it is robustly shown to be necessary to achieve viability across the whole scheme.
- Affordable housing which is being proposed should meet local needs, reflect demand for particular sizes, types and tenures of housing and conform with the definition in the National Planning Policy Framework (NPPF).
- Any proposal must be justified on the basis of a pressing local need for affordable housing which is demonstrated by appropriate evidence, including a local needs study relating to the area concerned.
- Those regarded as being in local need are:
  - People who need to be housed but are unable to compete in either the open market for house purchase or are unable to afford private sector rents
  - People who are local to a village or a group of villages by birth, previous or current residence, employment or by virtue of having a close family member living in the area
- There is also a policy included in the preferred options requiring 10% of private housing on housing schemes to be of a type which increases older people's housing choice to include bungalows, level access flats, specialist housing and multi-generation housing.
- The policy requires that all proposals must be in scale and keeping with the form and character of any nearby settlements and the local landscape and will be applied in addition to other relevant policies through the Plan.
- The policy seeks to ensure that any market housing is only included where it can be robustly demonstrated that this is essential to support the viable delivery of affordable housing. Only the minimum necessary should be included.
- Developers are encouraged to undertake pre-application public consultation in advance of the submission of any planning application.
- The policy approach seeks to support economic growth and the expansion of local businesses that are appropriate to the unique circumstances within rural areas. Therefore in some specific circumstances it may be appropriate to allow employment uses that would otherwise be contrary to planning policy.

## Question 20 - Tourism Accommodation and attractions in rural areas

**Question 20 - Should the Plan apply more flexibility to the consideration of tourism accommodation and attractions in rural areas where it would benefit the visitor economy? Please give reasons for your response.**

Number of Representations in policy area

71

**Summary of main issues raised by representations**

- The majority of respondents felt that flexibility should be applied to tourism attractions and accommodation in rural areas if it would benefit the local economy.
- However on the whole these respondents were clear that this flexibility should not be to the detriment of the rural area, assets or it's residents.
- A small proportion of respondents felt that flexibility should NOT be applied in rural areas.
- One respondent felt that the Local Plan should provide a strategic approach to guide the future development of the visitor economy, particularly in relation to the provision of tourism accommodation.
- Some respondents wanted to see the specific wording of the policy before commenting on whether the approach taken was acceptable.
- Concern was raise that increased flexibility would allow the circumvention of restrictions placed on others.
- It was suggested that support and grants for redevelopment of existing rural buildings for visitor accommodation would help boost the visitor economy.
- Use Aykley Heads.
- Proposals are too boring and not innovative. Should be looking more creatively at what can be done to boost the visitor economy.
- Developments must be required to make proportionate contributions to facilitate sustainable transport access, tour bus parking and appropriately located, limited car parking.
- Driver for additional bed spaces is likely to be influenced by economic triggers more than perceived planning control barriers.
- Caravan sites should have set numbers with no extensions allowed after the site is built. Figures should be produced showing static holiday sites and touring sites figures.
- Some respondents felt we should be exploring sites for specific types of accommodation provision e.g. camping/caravans or in some responses specific sites were proposed for tourism accommodation development.

**Question 20 - Should the Plan apply more flexibility to the consideration of tourism accommodation and attractions in rural areas where it would benefit the visitor economy? Please give reasons for your response.**

- The Tourist information Centre should be returned to Durham City Centre and a countywide hotel and B&B website, where individuals and tourist information centres can make bookings, helping visitors who come to the county spontaneously. Tourism offer should be better promoted generally.
- The regeneration process currently being implemented through the work of the Auckland Castle Trust at Bishop Auckland supports a number of the strategic objectives of the Plan and makes a significant contribution to the visitor economy but highlighted the need for new infrastructure and regional support in order to fully realise the aspirations for the project.

**Responses to main issues**

- The Plan recognises the untapped potential across the County as well as the need to increase the contribution of Durham's rural areas to the overall value of the County visitor economy.
- The policy has been developed to support rural tourism whilst protecting the County's assets as suggested. The rural and tranquil nature of Durham's countryside is an important asset for residents and visitors. Therefore development within more rural locations needs to be compatible with its location in order to protect this areas unique character. It is also important to ensure that existing heritage and environmental assets are both protected and supported in appropriate ways to help them flourish. The plan does not look to allocate sites or identify specific areas for tourism development but will respond to opportunities coming forward as planning applications.
- The Plan recognises the important role that the visitor economy plays in the overall economy of the County. New tourist facilities will be supported where they do not harm the character, quality and beauty that makes the area attractive to potential visitors.
- Appropriate conditions restricting accommodation to holiday use will be employed to avoid circumventing restrictions applied to others. Neither will the Plan look to allocate sites based on a forecast demand (which may or may not be achieved) but will respond to opportunities as planning applications.
- The policy has been developed to support developments that help future business viability of existing businesses or where it is a conversion of an existing building as suggested. It is not within the remit of the Plan to provide grants.
- Aykley Heads has been identified as a strategic employment site in the Plan.
- The policy has been developed to support rural/farm diversification and to be flexible enough to allow new creative and innovative ideas to come forward as suggested.
- The visitor policies have been developed to include accessibility criteria as suggested.
- The Plan does not look to allocate sites or identify specific areas for tourism accommodation but will respond to market led opportunities coming forward as planning applications.

**Question 20 - Should the Plan apply more flexibility to the consideration of tourism accommodation and attractions in rural areas where it would benefit the visitor economy? Please give reasons for your response.**

- Whilst setting figures for caravan sites could provide a degree of certainty, what might be an appropriate figure for one location might be wholly inappropriate for another. It is therefore proposed that this should be determined on a site by site basis. Visit County Durham produce statistics on accommodation provision in the County which is used as part of the evidence base for the Plan.
- The Plan will not look to allocate sites for visitor accommodation but will recognise the importance of the visitor economy in the county.
- The council recognises the importance of the Auckland Castle project and the role that it will play in building a strong competitive economy.

### Delivering a wide choice of high quality homes

#### Question 21 - Affordable Housing

**Question 21 - Are there circumstances where it would be appropriate to accept a financial contribution to be used to provide affordable housing elsewhere rather than have the affordable housing provided on-site? Please give reasons for your response.**

Number of Representations in policy area

104

#### Summary of main issues raised by representations

- Approximately half of all respondents suggested affordable housing should, where ever possible be provided on site to form balanced and viable communities with appropriate infrastructure and transport facilities.
- Approximately half of all respondents suggested that commuted sums are accepted in lieu of affordable housing being provided on site then the process would need to be rigorously monitored both from a planning and financial aspect.
- It is important for community cohesion that all our neighbourhoods should contain people of a variety of backgrounds and livelihoods.
- Any policy in the Plan should be suitably flexible in respect of affordable housing provision , to ensure it is responsive to local circumstances and changes in national policy over the lifetime of the Plan.
- A more flexible approach should also allow affordable housing to be delivered through alternative routes such as the Starter Homes initiative.
- Any financial contribution provided should be ring-fenced to be used for building affordable housing and not used for other schemes.
- There are a number of such circumstances. In particular, where the investment in affordable housing would be better focused elsewhere - regeneration initiatives for example.
- Provision of social, affordable housing should be seen as a high priority in its own right.

**Question 21 - Are there circumstances where it would be appropriate to accept a financial contribution to be used to provide affordable housing elsewhere rather than have the affordable housing provided on-site? Please give reasons for your response.**

- Flexible mechanisms should be in place to take issues such as viability into account, to ensure that developments are not over-burdened by policy requirements in the delivery of housing.
- A concern that affordable housing targets have been reduced from 25% to 15%.
- More effort should be taken to tackling Empty Homes.

**Responses to main issues**

- It is apparent that there is not a consensus as to the appropriateness of off-site contributions for affordable housing.
- It is recognised that the provision of affordable housing on-site as part of a wider housing development serves to support the creation of sustainable, inclusive and mixed communities. However, it is considered that there are some circumstances in which it may be appropriate to provide affordable housing off-site. For instance where there were such a small number of properties that would be difficult for a registered provider to manage them, where off site contributions would serve to deliver more affordable housing than if delivered on site, or where the site was in an area where there is already a localised oversupply of affordable homes.
- The wider chapter of Delivering a Wide Choice of High Quality Homes seeks to cover the other aspects of housing such as providing housing that is affordable, is of the right type and meets the needs of all sections of society.
- In all instances, the developer would be expected to robustly demonstrate that the off-site provision or financial contribution was acceptable as part of the determination of the planning application.
- The target levels for the delivery of affordable housing also reflect the NPPF which requires at least 10% of homes to be available for affordable home ownership. The affordable housing targets will be subject to regular review, alongside the Strategic Housing Market Assessment (SHMA), in recognition of changing circumstances and economic conditions.
- The Draft NPPF provides an updated definition of affordable housing this includes, affordable housing for rent, starter homes, discounted market sales housing and it identifies other affordable routes to home ownership. It is important that a variety of affordable housing options are offered to meet the circumstances of those in need and to cater for the affordable housing needs of specific groups.
- Any financial contributions will be sought in line with the Developer Contributions policy via a Section 106 legal obligation.
- There may also be circumstances where a financial contribution of broadly equivalent value can be accepted in place of on-site provision of affordable homes, for example in order to improve existing housing stock as part of the council's regeneration activities.

**Question 21 - Are there circumstances where it would be appropriate to accept a financial contribution to be used to provide affordable housing elsewhere rather than have the affordable housing provided on-site? Please give reasons for your response.**

- Many households in County Durham who lack their own housing or live in unsuitable housing cannot afford to buy or rent suitable houses at market rates. These households need affordable housing. The SHMA has undertaken an assessment of the need for affordable housing within County Durham and determined that there will be a net shortfall of 378 affordable dwellings per annum. This is the extent to which the need for affordable homes is greater than the supply.
- Where viability considerations dictate that the provision of affordable housing or older person's housing is below the levels set out in the policy, the council will include an overage payment clause in the Section 106 Agreement relating to the planning permission. This will serve to secure a financial contribution upon the completion of the scheme which would reflect any changes in market conditions, typically any uplift in the market. The financial contribution will be used to provide affordable housing and housing for older people.
- Affordable housing targets are determined according to viability through the Local Plan Viability report which recommends that affordable housing is determined against values area: Highest 25%, High 20%, Medium 15% and Low 10%.
- Bringing empty homes back in to use is a key priority for the council. We also recognise the issues experienced in some areas as a result of concentrations of vacant, underused properties and will continue to work with all relevant agencies and in particular Homes England to pursue funding that will allow as many properties as possible to be brought back into use.

**Question 22 - Housing needs of older people**

**Question 22 - In order to meet the housing needs of older people should we:**

**a. Allow developers to make their own decisions on house types and building standards;**

**b. Require developers to build a proportion of houses within housing schemes to the new optional building regulations**

**standard aimed at making homes more accessible and adaptable. If so, what proportion would be appropriate; or**

**c. Require developers to build bungalows, level access flats, multi-generational housing, sheltered housing or extra care**

**as a proportion of all new housing developments. If so, what proportion would be appropriate?**

**Please give reasons for your response.**

Number of Representations in policy area	130
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**Summary of main issues raised by representations**

- A general acceptance that there is an ageing population.

**Question 22 - In order to meet the housing needs of older people should we:**

- a. Allow developers to make their own decisions on house types and building standards;**
- b. Require developers to build a proportion of houses within housing schemes to the new optional building regulations standard aimed at making homes more accessible and adaptable. If so, what proportion would be appropriate; or**

**c. Require developers to build bungalows, level access flats, multi-generational housing, sheltered housing or extra care as a proportion of all new housing developments. If so, what proportion would be appropriate?**

**Please give reasons for your response.**

- The majority of representations expressed support for option b: requiring developers to build a proportion of houses within housing schemes to the new optimal building regulations standard aimed at making homes more accessible and adaptable and / or c: requiring developers to build bungalows, level access flats, multi generational housing, sheltered housing or extra care as a proportion of all new housing developments.
- Warden managed schemes are also a great idea in maintaining older people's dignity and individuality.
- Encourage developers to work with co-housing groups that are inter-generational or specifically for older people;
- An acknowledgement the requirement for older people is increasing significantly because of better health care and shortage of care homes and sheltered accommodation.
- Regenerating town centres would help older people as would dedicated housing or better use of existing housing.
- The council should identify suitable sites for housing that meets the needs of older people that are within the proximity of shops and services. Executive housing would fail to meet needs.
- There should be active support for 'self build' schemes.
- The percentage requirement for older persons should be:
  - 33%
  - 30%
  - 20%
  - 15%
  - 10%

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**standard aimed at making homes more accessible and adaptable. If so, what proportion would be appropriate; or**

**c. Require developers to build bungalows, level access flats, multi-generational housing, sheltered housing or extra care**

**as a proportion of all new housing developments. If so, what proportion would be appropriate?**

**Please give reasons for your response.**

- 5%
- Locally specific percentages should be set based on demographics
- The Home Builders Federation prefer the market to decide of house types and building standards because the industry provides housing according to market demand, as it needs to be able to sell the properties therefore the builders will respond to any demand. The effects upon viability are likely to be particularly acute in more marginal areas and could render development unviable.
- This policy approach will need to be assessed within the whole plan viability assessment to ensure that the on-site implications, such as lower density development and increased build costs are fully taken into account alongside other policy requirements.

#### **Responses to main issues**

- The population of the county is already ageing and over the next few decades, there will be a 'demographic shift' with the number (and proportion) of older people increasing;
- To contribute towards meeting the needs of the county's ageing population we will require a minimum of 10% of private or intermediate housing on sites of over 10 units which, in relation to design and house type, increase the housing options of older people;
- Appropriate house types considered to meet this requirement include:
  - Level access flats;
  - Level access bungalows;
  - Sheltered Housing or Extra Care Schemes; or
  - Housing products that can be shown to meet the specific needs of a multi generational family.

**Question 22 - In order to meet the housing needs of older people should we:**

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- b. Require developers to build a proportion of houses within housing schemes to the new optional building regulations**

**standard aimed at making homes more accessible and adaptable. If so, what proportion would be appropriate; or**

- c. Require developers to build bungalows, level access flats, multi-generational housing, sheltered housing or extra care**

**as a proportion of all new housing developments. If so, what proportion would be appropriate?**

**Please give reasons for your response.**

- All of these properties must be built to Building Regulations Requirement M4 (2) (accessible and adaptable dwellings) and situated in the most appropriate location within the site for older people;
- There may be particular opportunities within some housing schemes for developers to accommodate commercial sheltered housing with a resident warden or extra care schemes which offer round the clock care.
- There is a recognition that housing sites near to existing or proposed retail centres and services are likely to be particularly suitable;
- There may also be opportunities to provide self build plots for retirement housing in housing schemes, or a group of self build plots aimed at co-housing groups. At the present time, most self builders are older people building for their retirement;
- The supporting text of the policy recognised that there may also be opportunities to provide self build plots for retirement housing in housing schemes, or a group of self build plots aimed at co-housing groups. At the present time, most self builders are older people building for their retirement;
- The Local Plan Viability Study shows that it is generally viable for all housing sites to include 10% of private houses which are either level access flats, bungalows, sheltered housing, extra care schemes or multi generational housing, all built to Building Regulations Requirement M4 (2) (accessible and adaptable dwellings);

#### **Question 23 - Call for Sites**

**Question 23 - Should evidence show they are required, are there any sites that should be considered for Gypsy and Traveller pitches? Please refer to the Call for Sites document(xxvi) for detail on what information is required.**

Number of Representations in policy area	19
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**Summary of main issues raised by representations**

**Question 23 - Should evidence show they are required, are there any sites that should be considered for Gypsy and Traveller pitches? Please refer to the Call for Sites document(xxvi) for detail on what information is required.**

- Any sites must require robust evidence of absolute need.
- Rural sites as befitting a rural lifestyle.
- Planning assessment needs to be consistent with Government planning policy for Traveller sites.
- The County Council has many brownfield sites around the county and these should be used before looking for privately owned land.
- Must be sited in areas which are also acceptable to existing settled local communities.
- Site suggested at Ford Road, Lanchester.

#### Responses to main issues

- The Travellers Site Needs Assessment concludes that for the ten year period to 2026 there will be need for additional pitches for five gypsy and traveller households. However, since the base date of the assessment, an additional pitch has been granted planning permission which will accommodate two gypsy and traveller households. This leaves an outstanding need for pitches to accommodate three additional households over the ten year period. The number of new private pitches for gypsies and travellers granted planning permission as a result of planning applications has averaged around five per year over the last five years. It is therefore reasonable to expect that this need will be met through continuing permissions arising from planning applications over the next few years and there is therefore no need to identify any additional sites.

#### Question 24 - Call for Sites

**Question 24 - Should evidence show they are required, are there any sites that may be suitable for student accommodation? Please refer to the Call for Sites document(xxvii) for detail on what information is required.**

Number of Representations in policy area	30
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#### Summary of main issues raised by representations

- A number of sites were submitted which have been assessed to determine their suitability for allocation as Purpose Built Student Accommodation (PBSA).
- Student accommodation should be moved further out of the city within University campuses with transport provided by the University including in settlements along the A167.
- Sites should be considered which do not impact upon the historic environment (including the World Heritage Site, setting of the World Heritage Site and the conservation area), flood risk, highways, ecology, open space and be appropriate to its location.
- No further sites should be identified within Durham City.

**Question 24 - Should evidence show they are required, are there any sites that may be suitable for student accommodation? Please refer to the Call for Sites document(xxvii) for detail on what information is required.**

- The University should use its own land to build student accommodation.
- A large proportion of houses in Durham City are already occupied by students and therefore not available for families.
- A suggestion that any future PBSA development in Durham be considered only after close and effective consultation with the University and student residents so as to ensure that (a) there is sufficient demand and (b) that demand cannot be met in a more sustainable manner which fits the needs and desires of both permanent and student residents.
- PBSA should be built in a manner which allows easy conversion to houses for retirement and older people in general.
- The University is not the only higher education establishment within the city whose students will require housing.

#### **Responses to main issues**

- Each site submitted for PBSA has been assessed to determine its appropriateness for allocation. Sites which have been allocated are: Leazes Road; Howlands (Josephine Butler and Ustinov; James Barbour House; Elvet Hill car park; Green Lane; Mill Hill Lane; St Aiden's College; St Mary's.
- Durham University is a major asset to the city, shaping the built environment, contributing to the cultural and heritage offer, developing highly skilled individuals as well being a major employer and a purchaser of local goods and services.
- The policy approach seeks to ensure that proposals contribute to the re-use of listed buildings, heritage assets and other buildings with a particular heritage value and will be expected to sustain the significance of heritage assets and seeks opportunities to better reveal it.
- Durham University has published its Strategy for the period 2017 to 2027. This Strategy sets out how the University will build upon their strengths including research, education and the wider student experience. The Strategy also encompasses the Estate Masterplan 2017-2027 which provides a guide to how the University could develop the Estate in the long term.
- With a student population of 15,500 and as a key employer which employs over 4,300 people, Durham University has a major impact on how the city functions.
- The University's aspiration, as set out in the Masterplan, is to house 50-55% of students in college-affiliated accommodation by 2027. The University is seeking to achieve this by developing new colleges on their own land.
- National planning guidance (PPG) states that all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus can be included towards the supply of housing based on the amount of accommodation it

**Question 24 - Should evidence show they are required, are there any sites that may be suitable for student accommodation? Please refer to the Call for Sites document(xxvii) for detail on what information is required.**

releases into the housing market. Despite the development of new student accommodation within the county, current evidence does not indicate that it is resulting in houses in multiple occupation (HMOs) being released into the general housing market.

- In County Durham the majority of HMOs are located in Durham City and are occupied by students of Durham University.

#### Question 25 - Houses in Multiple Accommodation

**Question 25 - Do you support our intention to include the student accommodation Interim Policy in the County Durham Plan? Please give reasons for your response**

Number of Representations in policy area

55

#### Summary of main issues raised by representations

- Overall there was support for inclusion of the Interim Policy in the Preferred Options Plan policy
- Concerns expressed about impact of the student population on Durham City including on number and concentration of HMOs in the city, empty properties outside of term times, garden appearance,
- It was noted that the student population plays a significant economic and social role in Durham City
- Previous County Council estimate for student accommodation is in excess of that needed by Durham University.
- Need must be demonstrated - there is an oversupply of student accommodation and other forms of housing should take precedent
- Too small an issue to consider in a strategic plan
- Objection to the Interim Policy being included in its current form - it is based on the Durham University 2012 Accommodation Strategy
- The article 4 direction should be expanded to Framwellgate Moor, Newton Hall and Pity Me (as set out in para 4.58 of Issues and Options) The article 4 direction should be extended to other areas.
- The University should provide for accommodation
- There should be a moratorium on HMOs
- Students should only live in PBSA (not HMOs)
- The Interim Policy should be strengthened to limit and stop further accommodation in Durham City.

**Question 25 - Do you support our intention to include the student accommodation Interim Policy in the County Durham Plan? Please give reasons for your response**

- The policy should be strengthened; refined; improved based on implementation experience
- The views of students and residents should be sought on the policy
- Affordable housing should be included within PBSA (i.e. affordable for students)

**Responses to main issues**

- Support for inclusion of the Interim Policy is noted. The council has been able to consider the implementation of the Interim Policy since its introduction, therefore, the policy has been updated to address issues arising from the practical application of the Interim Policy.
- The assessment of need will give consideration to a range of factors including waiting lists for existing places (both University and privately owned stock and, if appropriate those of any other higher education establishment), the potential contribution of schemes with planning consent; and University student growth forecasts. As part of considering need, developers should demonstrate what specific need the proposal is aimed at and why this need is currently unmet.
- The homes needed in an area is considered to be a strategic issue to be addressed by the Plan.
- The preferred options Policy references the most up to date University Strategy.
- The Article 4 Direction for Framewellgate Moor, Newton Hall and Pity me came into force on the 13th May 2017 this is separate to the Plan making process. any further Article 4 designation will be considered outwith the plan making process.
- The aim of the policy is to promote the creation of sustainable, inclusive and mixed communities and maintain an appropriate housing mix.
- The Plan contains a specific policy to deliver affordable housing to meet identified affordable housing need in County Durham. There is a range and diversity of accommodation within the student housing market. this will provide housing options for students.

**Question 26 - Type and Mix of Housing**

**Question 26 - Do you agree that we should assess the type and mix of housing on a site-by-site basis? Please give reasons for your response.**

Number of Representations in policy area

95

**Summary of main issues raised by representations**

- The majority of respondents supported the proposed policy direction.

**Question 26 - Do you agree that we should assess the type and mix of housing on a site-by-site basis? Please give reasons for your response.**

- The type of housing suitable for any particular site will vary depending on individual site factors. These would include such factors as location, transport links, environmental impact, impact on adjacent areas, practicality of construction etc. The type and mix of housing should therefore be considered on a site-by-site basis
- Development should also ensure affordable provision, housing for older people and regeneration.
- Agree with site-by-site assessment of suitability providing this is done for the wider good and not just for developers' profits.
- Too much prescription will not allow flexibility for dealing with individual site characteristics, as well as supporting economic regeneration, balanced communities (generational, social and economic, etc.) and promoting innovation in housing provision.
- Flexibility will ensure the Plan can adapt to any unforeseen changes and therefore be found sound (e.g. changes to the economy, need, demand and expectations of purchasers etc.).
- A policy dictating housing type and mix requirements would need to ensure that need and demand is met until 2033 and as such flexibility is needed to respond to shifts in the market – be they gradual or sudden, short term or long term.
- It was also noted that developers would not deliver housing types that are not market compatible. As such, development should be market-led rather than prescribed in the Local Plan.
- There should be guidance for the County and sub-areas.
- Locality-based targets, balanced against the overall County's needs, would be of benefit.
- There is a place for both county-wide targets and assessment on a site-by-site basis.
- Without an overarching policy, neighbourhood plans could set the mix of housing in their area and potentially frustrate any attempt to achieve the wide choice of high quality homes that the NPPF requires. Consequently we believe that if the Plan lacks county wide targets it could be found to be unsound at the EiP.
- The only variation on the blanket assessment should be by the different market area (assuming that County Durham isn't a single market area) or urban area. Sites within the same market/urban should be assessed on the same criteria
- The council should not only “assess the type and mix of housing on a site-by-site basis” but also commit to being more proactive in facilitating custom-build's access to participation in *providing* the determined mix.

**Responses to main issues**

- The Plan will be supportive of a range of housing types including self-build and community models, including

**Question 26 - Do you agree that we should assess the type and mix of housing on a site-by-site basis? Please give reasons for your response.**

community-led housing schemes.

- The Strategic Housing Market Assessment (SHMA) will set the context for this policy, which whilst not setting targets *per se*, will provide a basis for negotiations when establishing type and mix on individual sites. This ensures a flexible and responsive approach which will be monitored and updated on a regular basis, in line with reviews of the SHMA. The SHMA also identifies a range of smaller monitoring areas within the County which will ensure local requirements are reflected to a certain extent.
- The Plan will include requirements for affordable housing and housing for older people so there is provision for ensuring a wide choice of housing, in accordance with the NPPF.
- Neighbourhood Plans need to be in general conformity with national guidance (including the NPPF) so there it wouldn't be possible for it to deliberately frustrate attempts to achieve the wide choice of high quality homes.

### Protecting Green Belt land

#### Question 27 - Green Belt boundaries

**Question 27 - Do the existing Green Belt boundaries serve the five Green Belt purposes of: checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging into one another; assisting in safeguarding the countryside from encroachment; preserving the setting and special character of historic towns and assisting in urban regeneration? Please give reasons for your response.**

Number of Representations in policy area	120
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#### Summary of main issues raised by representations

- Green Belt meets all five of the purposes set out within National Planning Policy Framework (NPPF) and this has not changed since first introduced in Durham.
- There needs to be a distinction in the Plan between greenfield and Green Belt.
- A concern that a full Green Belt assessment has not been carried out.
- Individual sites have been promoted for removal from the Green Belt.
- Green Belts are important and should be retained as they also have a recreational, preventing pollution and biodiversity value.
- There is a need to retain the Green Belt around Durham City.
- Any removal of land from the Green Belt should not impact on the setting of the World Heritage Site and other historic assets.
- Purposes 4 and 5 will not be met if the council proposes the Main Town option.

**Question 27 - Do the existing Green Belt boundaries serve the five Green Belt purposes of: checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging into one another; assisting in safeguarding the countryside from encroachment; preserving the setting and special character of historic towns and assisting in urban regeneration? Please give reasons for your response.**

- Brownfield sites should be built on first.
- Green Belt should prevent towns and villages from coalescing and thus merging into one another.
- Need to recognise sewage treatment works which are within the Green Belt.
- The preparation of the local plan should be the most appropriate juncture to address anomalies; and
- Areas of safeguarded land should be considered.

#### **Responses to main issues**

- A full comprehensive Green Belt assessment has been undertaken for all Green Belt across the county.
- The glossary seeks to provide a definition for both greenfield and Green Belt.
- The Green Belt assessment considered land defined as general areas as well as submitted sites against the five purposes set out in National Planning Policy Framework (NPPF).
- The Green Belt policy within the Plan includes reference to opportunities for increased or enhanced access to the countryside as well as improvements to landscapes, visual amenity and biodiversity.
- The council is committed to protecting the Green Belt, however exceptional circumstances exist for some Green Belt deletion however great consideration has been had to protecting the setting of the historic town and in particular the World Heritage Site and other heritage assets.
- The chosen Sustainable Communities option for the spatial strategy for the distribution of housing, which is the starting point for identifying housing allocations, is a dispersed pattern of development located in key settlements across the county and principally focused in and around the towns where the greatest opportunities for employment, services and facilities, public transport and other infrastructure such as healthcare and education exist.
- Exceptional circumstances only exist where other reasonable alternatives include previously developed (brownfield) land first have been maximised.
- The Green Belt assessment includes consideration against Purpose 2: to prevent neighbouring towns merging into one another.
- NPPF sets out that engineering operations are not inappropriate in the Green Belt which would include engineering works at Sewage Treatment Works.

**Question 27 - Do the existing Green Belt boundaries serve the five Green Belt purposes of: checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging into one another; assisting in safeguarding the countryside from encroachment; preserving the setting and special character of historic towns and assisting in urban regeneration? Please give reasons for your response.**

- The Plan includes a policy which deals with non strategic Green Belt amendments.
- There is currently no evidence to suggest that land will be required in order to meet longer-term development needs stretching well beyond the Plan period.

#### Question 28 - New Green Belt

**Question 28 - Are there any areas of the county where there are sufficient exceptional circumstances which would justify new Green Belt? Please give reasons for your response.**

Number of Representations in policy area	220
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#### Summary of main issues raised by representations

- The vast majority of respondents proposed an extension to the Green Belt at Dalton Heights at Seaham.
- Other areas proposed for an extension to the Green Belt included:
  - Mid Durham - Spennymoor, Ferryhill and Chilton
  - Bishop Auckland, Sedgefield and Castle Eden
  - Consett and Stanley
  - North West of the county
  - Brandon from Willington and safeguarding the setting of Brancepeth
  - Limestone escarpment villages
  - The outer boundary of the Green Belt around Brandon, Langley Moor and Meadowfield
  - South Durham
- Some respondents suggested that development management policies would be sufficient to protect the countryside from development.

#### Responses to main issues

**Question 28 - Are there any areas of the county where there are sufficient exceptional circumstances which would justify new Green Belt? Please give reasons for your response.**

- Housing development was approved on appeal at Dalton Heights, Seaham.
- The National Planning Policy Framework (NPPF) is clear that the general extent of Green Belts across the country is already established and areas of new Green Belt should only be established in exceptional circumstances. As part of the consultation on the Issues and Options, a number of proposals were put forward however none of the proposals demonstrated: why normal planning and development management policies would not be adequate; what major changes in circumstances have occurred; what the consequences of the proposal would be for sustainable development; the necessity of the Green Belt and its consistency with other strategic plans for adjoining areas and how the proposed Green Belt would meet the other objectives of the NPPF.

**Question 29 - Changes to the Green Belt Boundary**

**Question 29 - Are there any non-strategic sites within the existing Green Belt where a change to the Green Belt boundary would be justified? If so, for what type of development and what are the exceptional circumstances for that change?**

Number of Representations in policy area	45
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**Summary of main issues raised by representations**

- The majority of representations put forward areas of land to be deleted from the Green Belt;
- Other representations commented that there should be no consideration of Green Belt deletions.

**Responses to main issues**

- A comprehensive Green Belt assessment has been undertaken for the County's Green Belt which determines whether general areas and parcels continue to meet the five Green Belt purposes; and
- Further to this, exceptional circumstances have been identified for non strategic sites at Skid Pan, Durham City; Fernhill, Durham City and Lumley Boys School, Great Lumley and set out within the "Non Strategic Green Belt Amendments" policy.

**Question 30 - Major Developed Sites in the Green Belt**

**Question 30 - Do you agree that there is no longer a need to identify sites as Major Developed Sites in the Green Belt? Please give reasons for your response.**

Number of Representations in policy area	39
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**Summary of main issues raised by representations**

- Major Developed Sites should be identified.
- Any proposals for redevelopment of sites in the Green Belt can be dealt

**Question 30 - Do you agree that there is no longer a need to identify sites as Major Developed Sites in the Green Belt? Please give reasons for your response.**

with by applying the five purposes of Green Belts rather than needing to be explicit about Major Developed Sites.

- The Plan should include a policy which refines the mention in National Planning Policy Framework (NPPF) such that partial or complete redevelopment of previously developed sites in the Green Belt is acceptable in principle provided that it does not extend beyond the existing development's footprint nor has a greater impact on openness or the five Green Belt purposes.
- Buildings demolished in the Green Belt can be restored to greenfield uses.
- There should be a policy limiting any such redevelopment to the existing 'footprint'.
- Much of the previously developed sites within (and out with) the Green Belt is likely to be dealt with under the provisions of the new planning act relating to permission in principle for sites on the brownfield register.

**Responses to main issues**

- The Plan will not provide specific reference to Major Developed Sites as per the current approach in the City of Durham Local Plan.
- The Green Belt policy will reflect the requirements of National Planning Policy Framework (NPPF) which sets out exceptions to development which is not inappropriate.
- The Green Belt policy proposed sets out that the partial or complete redevelopment of previously developed sites (excluding temporary buildings) providing the proposal has no greater impact on openness or the purpose of including land within it or where the development would reuse previously developed land and contribute towards meeting an identified local affordable need without causing substantial harm.
- The Green Belt policy proposed will also set out that the replacement of a building, providing it is in the same use and not materially larger than the one it replaces.
- The council maintains a brownfield land register which is available to view online. Permissions in principle will be continually explored.

**Promoting sustainable transport**

**Question 31 - Congestion hot spots in the County**

**Question 31 - Are there any significant congestion hotspots in the county that could require building a new road? Please give reasons for your response.**

Number of Representations in policy area

72

**Summary of main issues raised by representations**

**Question 31 - Are there any significant congestion hotspots in the county that could require building a new road? Please give reasons for your response.**

- Many respondents felt that current road infrastructure in Durham City is not fit for purpose. The traffic can act as a barrier between East and West Durham. More houses will exacerbate the problems relating to congestion in the city centre and close to the A167. The congestion will be unattractive for new business coming to the city. Bus and taxi lanes will do nothing to correct the issues. Northern and Western bypasses would significantly alleviate the congestion problems. There was support for a longer Western Relief Road (WRR) that terminated at Cock o the North roundabout.
- Building new roads to alleviate peak hour traffic problems is not the long term answer to traffic congestion. The city does not need new roads and should not build in the greenbelt. The Northern Relief Road (NRR) would lead to more traffic along Rotary Way. We need to be more creative and imaginative when planning solutions. Durham needs another Park and Ride to the west, e.g. at Stonebridge or Langley Moor or a railway station at Littleburn giving access to Durham and Newcastle to the North and Darlington to the South. Some respondents were also concerned about the environmental impact of new relief roads.
- Sustainable transport should be a priority as it will manage traffic growth effectively and improve people's health. Active travel and demand management can play a significant part in alleviating traffic growth and improving people's health. Air Quality is a serious issue in Durham City which relief roads won't solve.
- The council must not allow the Plan to become wholly about Durham City's traffic system. A number of other road schemes were proposed in response to the Issues and Options consultation including relief roads for Bowburn, Barnard Castle and the Darlington Northern Relief Road.
- Significant numbers of respondents felt that a Barnard Castle relief road is long overdue and essential to reduce congestion in the town and preserve its existing historic and unique character and make it more attractive for tourism. Some residents of Barnard Castle should be an immediate ban on HGVs (other than those based locally) from entering the town, in order to avoid further and continuing damage to structures such as the market cross and the county bridge and general congestion and pollution. There were also highways safety concerns mentioned in Barnard Castle. A relief road would also help as a diversion route when there is a problem on the A66.
- There was also some opposition to proposals for a Barnard Castle Relief Road. The relief road would be used as it still requires drivers wanting to bypass the town to use Abbey Road bridge and country lanes before linking to the A66. Also concern that there is the potential for more traffic to be passed to Staindrop. Some concern about the environmental and economic impact of a new relief road.
- In Newton Aycliffe, the road between Woodham and Rushyford takes an exceptional amount of traffic which will only become worse with a new housing development planned adjacent to Woodham Golf Club. Similarly in Newton Aycliffe, Burn Lane leading from the Tesco Store to Cobblers Hall Public House, takes probably ten times the amount of traffic (again especially at peak periods) it was designed for.
- There were also some concerns raised around congestion on the A688 near Bishop Auckland and near Bowburn, the A690 near Langley Moor/Meadowfield/Brandon while Bowburn Partnership raised concerns about the A177 in Bowburn and the potential need for a Bowburn Relief Road.

**Question 31 - Are there any significant congestion hotspots in the county that could require building a new road? Please give reasons for your response.**

- Some felt there was nowhere in the county where new roads would ever be acceptable. Traffic is always lighter when the schools are on holiday and the council should be targeting educational trips to switch to more sustainable modes such as walking or cycling to schools.
- Nexus commented with regard to bus partnerships and the Leamside line.

**Responses to main issues**

- In order to create a more sustainable transport network in Durham City there is a need for a positive strategy that manages the demand for car use by reallocating, sharing and creating highway space for sustainable transport modes and correcting the faults in the current highway network.
- The council are aware of the need to consider the residual traffic impacts relating to the northern relief road (NRR). The junction with Rotary Way/A167 is one area among others that the council would look to improve if the NRR was built.
- The council are always assessing opportunities to improve the Park and Ride service. This could be by looking at increasing the size of the sites, installing more bus lanes or to use the sites more frequently for events.
- Durham City is the most important employment centre in the county and the only key employment location within the county which can be described as having a county-wide employment draw. It therefore needs the right infrastructure to cope with being the key employment centre in the county.
- The need to combat poor air quality is one of the reasons why the the council are proposing a Durham City Sustainable Transport Delivery Plan and an Air Quality Management Strategy and Action Plan
- The council agree that traffic is less in school holidays because children are not attending school and many parents take heir holidays from work too. The council would not be proposing new roads if they believed they could deal with congestion at peak hours with sustainable transport interventions only.
- Proposals at Integra 61 will bring forward significant new industrial and housing development. Some of the associated traffic generated from the development could potentially avoid using part the A177 through Bowburn if a highway connection were provided along the line of the previously protected corridor. As this development is built out it the impact of the associated additional traffic will monitored and it maybe that at some point in the future an industrial estate access road will be required. In order to ensure that the option of providing this road remains the Plan will safeguard the proposed route on the policies map.
- The delivery of the relief road in Barnard Castle would be dependent on securing funding from the Department for Transport (DfT) which would require a robust business case. As a result of the projected traffic flows expected on the new road it would be difficult to secure funding for this scheme during the Plan period. Therefore, although the council recognises that there would be some benefits resulting from a relief road the uncertainty over how it would be funded means that we are unable to allocate or safeguard the route. However as the council believe there is

**Question 31 - Are there any significant congestion hotspots in the county that could require building a new road? Please give reasons for your response.**

some merit to the scheme we have identified a corridor of interest on the polices map. If the position was to change in the future then we would consider the relief road in a future review of the Plan.

- In Newton Aycliffe, the traffic in this area and possible mitigation is being considered as part of the development management process.
- The council support a future Darlington Northern Relief Road

**Question 32 - Existing and Future Predicted Traffic in Durham City**

**Question 32 - Does existing and future predicted traffic in Durham City have an unacceptable impact on give reasons for your response.**

Number of Representations in policy area

81

**Summary of main issues raised by representations**

- The majority of respondents felt that the traffic was unacceptable, however, some felt that congestion was not as bad as other city in the country.
- The traffic in Durham City is unacceptable. The traffic system around Durham City is totally outdated. The traffic is less attractive, has an adverse impact on the environment and the setting of the World Heritage site. It also impacts on pedestrians and cyclists as traffic is very heavy. Thus impacting on health, due to air pollution and road safety. Noise is also constant and can cause stress.
- Traffic congestion is worsening in Durham City. In my recent 30 years of residency we have changed our shopping habits because of this. We often choose to shop and socialise elsewhere. Other similar historic cities have managed to do this economically and the traffic deters shoppers and tourists.
- It is probably not unacceptable at present but traffic will become unacceptable if future development is concentrated in the city.
- Development, employment opportunities and housing should be concentrated in outlying areas and those required in conjunction with limited infrastructure developments required to support this strategy.
- Levels of traffic do not justify relief roads but air quality needs to be dealt with as a priority.
- To achieve the housing OAN, the council must put houses in Durham City and consider the implications of this.
- Planners need to think outside the box, build another park and ride to the west and get better bus services.
- Cycling provision needs to be improved especially if the Council want to attract new jobs to the City.
- These proposals are based on an over optimistic employment strategy. Again I feel that the Council need to be realistic and have high levels of traffic on Urban Roads as seen in the 2000s.
- There must be careful consideration of how it is traffic in Durham City is addressed. CPRE has consistently supported Northern and Western Relief Roads and will continue to do so, but fully supports the promotion of sustainable transport into the city centre.

### Question 32 - Does existing and future predicted traffic in Durham City have an unacceptable impact on the environment? Give reasons for your response.

- Greater Willington Town Council support the Western Relief Roads as many of their commuters suffer delay at the Neville's Cross junction when travelling to jobs in Durham and in Tyne and Wear.
- City of Durham Trust reject the call for new roads and that the proposition for a new road such as the North Road is not necessary to improve conditions for other road users in Durham City.
- There also 24 identical responses stating that Durham City needs to grow in order for the council to achieve its vision. The transport infrastructure should grow in line with the transport plans with an assessment done if there is any extra highway capacity.

### Responses to main issues

- Durham City is the only settlement within the County where sustainable commuter trips rival the number of private car trips with over 40% of trips within Durham City 'zone' being made by sustainable methods (Census data 2011)
- In terms of transport impacts the SA found that the Wider Dispersal option was likely to significantly increase emissions. This conclusion was supported by the Census Data Analysis undertaken which stated that the 'peripheral' development in settlements located on the periphery of the County, such as Chester-le-Street and Seaham, has a higher number of cross-boundary trips as these areas have a stronger link with neighbouring authorities. This can be considered to result in greater car-borne travel, as these cross-boundary trips are less likely to be undertaken by sustainable modes.
- The council agree that improving public transport is very important. Public transport though, has a low modal share in Durham with only 8% of its residents using bus or rail. The Council also only has a limited role in improving public transport in the County and subsidies for non commercially viable services have been cut in recent years. We do though have plans to improve bus journey times relative to car travel by implementing bus lanes and traffic management systems.
- The Draft Durham City Sustainable Transport Delivery Plan (DCSTDP) sets out an ambitious and positive vision for a transport network across the city and has been developed in partnership with the city's key stakeholders after a series of events and consultations. The Draft DCSTDP sets out how modal shift can be practically achieved in the city through a combination of packages of demand management and infrastructure improvements to reduce traffic. Its key proposals are a Sustainable Transport Infrastructure Delivery Plan (IDP).
- The Draft DCTDP is clear that the long term transport plan for the city centre is dependent on the ability to provide more space 'for people' travelling on foot, by bike and bus. This is impossible to achieve without a new crossing over the Wear which provides replacement road space for cars crossing Milburngate Bridge. A new crossing provides the opportunity to reprioritise space on Milburngate Bridge for sustainable modes bringing significant transport and environmental benefits to the city centre.
- A feasibility study of possible highway improvements to the A167 corridor between Neville's Cross and Snipston was undertaken. The objectives of the study were to try and improve journey times and reduce traffic congestion on the A167 to accommodate existing and future traffic. The study was seeking to model an alternative solution to building a Western Relief Road but unfortunately it was unable to model a satisfactory alternative that would reduce overall journey times.
- Given an absence of an effective alternative and the existing and future congestion there is therefore a requirement for the provision of a Western Relief Road (WRR). The relief road will allow traffic from the A690 and A691 to access the city centre thus reducing congestion for all users. The most significant reductions in traffic take place on the length of the road by the proposed Western Relief Road.

## Question 33 - Durham City Sustainable Transport Strategy 2016-33

**Question 33 - The Draft Durham City Sustainable Transport Strategy identifies the following infrastructure**

measures which would create a more sustainable transport network in the city. Which measure or measures do you believe are important and why?

- a. A new crossing of the River Wear through the provision of a Northern Relief Road;
- b. Improvements to the existing city centre transport infrastructure such as to the bus station and stops;
- c. Pedestrian improvements linking the University to the city centre;
- d. Improving missing links for sustainable transport modes in and across main roads and junctions at Aykley Heads, Sniperley, Framwellgate Moor and Newton Hall;
- e. Reducing congestion by making appropriate improvements for all transport modes in Gilesgate, Dragonville, Carrville and Belmont; or
- f. Any other suggestions.

Number of Representations in policy area	98
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**Summary of main issues raised by representations**

- Overwhelming support for the introduction of the Sustainable Transport Plan. Some criticism that the objectives didn't follow through to the transport measures in plan. The issue of Air Quality in the city was raised a number of times.
- Importance of safer pedestrian routes was mentioned and more recognition of mobility Issues was highlighted. Needs to be a core network of cross city cycle routes and more sustainable links to the rail station and bus station by sustainable modes.
- Students fill up buses on relatively short trips between University and city.
- Need to extend pop-card to Durham.
- More detail required on the rail network especially Leamside and services from Chester-Le-Street,
- Bus Station re-development is not relevant.
- Park and Ride should have more sites, longer hours, more coverage, higher frequencies.
- Too many taxis, ranks in wrong place, taxis should use a central booking number.
- Stricter parking restrictions should be used in city centre
- Significant support for the Northern Relief Road (NRR). Out of those who specified a response 50% more supported the NRR than opposed it.

**Question 33 - The Draft Durham City Sustainable Transport Strategy identifies the following infrastructure**

**measures which would create a more sustainable transport network in the city. Which measure or measures do you believe are important and why?**

- a. A new crossing of the River Wear through the provision of a Northern Relief Road;**
- b. Improvements to the existing city centre transport infrastructure such as to the bus station and stops;**
- c. Pedestrian improvements linking the University to the city centre;**
- d. Improving missing links for sustainable transport modes in and across main roads and junctions at Aykley Heads, Sniperley, Framwellgate Moor and Newton Hall;**
- e. Reducing congestion by making appropriate improvements for all transport modes in Gilesgate, Dragonville, Carrville and Belmont; or**
- f. Any other suggestions.**

- Some supported re-allocating road space on Milburngate Bridge for sustainable modes, some opposed it.
- Some supported removing space for cars but did not agree with building replacement space via a NRR.
- All agreed there was a need to do something about the transport network
- Targets around modal shift lack ambition and should be more aligned to Air Quality Strategy and a County Hall Travel Plan.

**Responses to main issues**

- New logic maps have been included in delivery plan that show relationship between objectives and outcomes in the plan. There is also a new section included in delivery plan dedicated to Air Quality.
- Safe pedestrians crossing points have been identified in all areas, mobility needs highlighted throughout strategy, core and cross city cycle routes presented as a key challenge, rail station links now improved
- The council has been jointly working with University to improve student transport links.
- The pop card is now available although this has been overtaken by contactless technology.
- Bus station infrastructure is always relevant to bus service provision.

**Question 33 - The Draft Durham City Sustainable Transport Strategy identifies the following infrastructure**

**measures which would create a more sustainable transport network in the city. Which measure or measures do you believe are important and why?**

- a. A new crossing of the River Wear through the provision of a Northern Relief Road;**
- b. Improvements to the existing city centre transport infrastructure such as to the bus station and stops;**
- c. Pedestrian improvements linking the University to the city centre;**
- d. Improving missing links for sustainable transport modes in and across main roads and junctions at Aykley Heads, Sniperley, Framwellgate Moor and Newton Hall;**
- e. Reducing congestion by making appropriate improvements for all transport modes in Gilesgate, Dragonville, Carrville and Belmont; or**
- f. Any other suggestions.**

- The council support better rail links but have limited influence on national or northern rail network.
- Park and Ride services requires subsidies to run but the council are always assessing new opportunities to improve and extend the service.
- It would be difficult to restrict the operation of taxis under one central booking number.
- There are already policies to reduce long stay parking in the city centre although the council only manage and operate 10% of the current stock of parking space in the city.
- The Draft DCSTDP is clear that the long term transport strategy for the city centre is dependent on the ability to provide more space 'for people' travelling on foot, by bike and bus and where there are barriers to direct continuous routes, those barriers need to be removed. This is impossible to achieve without a new crossing of the River Wear which provides an alternative to Milburngate Bridge. A new crossing provides the opportunity to re-prioritise space on Milburngate Bridge bringing significant transport and environmental benefits to the city centre. Specifically, the DCSTDP recommends reducing the number of car lanes on the Bridge, making this route less attractive for through trips and creating more space for pedestrians, cyclists, bus users, those with disabilities and visitors. It will also create significant air quality benefits by removing unnecessary slow moving and standing traffic including heavy goods vehicles from the city addressing the principal cause of the increased Nitrogen Dioxide levels that resulted in the designation of the Air Quality Management Area. Displacing non-essential car trips away from the city centre will also encourage residents and visitors to use active travel and public transport when travelling into the city at peak hours, rather than taking the car into the city. In order to provide this crossing the Plan therefore proposes a Northern Relief Road (NRR).
- Modal shift targets should be realistic and based upon monitoring trips to work and education which dominate the peak hour traffic.

## Question 34 - A167 Congestion

**Question 34 - Are measures required to address the congestion on the A167 from Nevilles Cross to Sniperley Roundabout? Please give reasons for your response.**

- a. There are no measures required**
- b. Yes. A Western Relief Road; or**
- c. Yes. An alternative proposal (please specify).**

Number of Representations in policy area	94
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#### Summary of main issues raised by representations

- Just over a third of respondents felt no measures were required on the A167.
- Traffic in Durham is not as bad as elsewhere in the country and there is likely to be a decline in international immigration.
- Congestion is limited to peak hours. Employment and housing should be not be allocated in Durham City.
- The road would form a new development corridor for more housing and would be environmentally damaging to wildlife, ecology and the landscape.
- There is no justification for the statement that the 'Western Relief Road would have environmental benefits along the corridor of the A167' itself.
- Just under a third of respondents believed the Western Relief Road was required to address the congestion on the A167.
- The road should have been built years ago.
- It would solve the congestion associated with Nevilles Cross and create a better environment in Nevilles Cross for existing residents and those walking and cycling in the area.
- It would reduce pollution in along the corridor of the A167.
- A relief road would have significant benefits for staff arriving at work and would reduce conflict with school trips to Durham Johnston.
- Just under a third of respondents suggested an alternative measure to address the congestion on the A167.
- The A167 should be duelled with one lane in each direction made a bus lane and also a lane for cyclists.
- New Park and Ride facilities would solve the congestion issue, particularly one on the A690 before Nevilles Cross
- Bus fares should be reduced with free buses for students going to school.

**Question 34 - Are measures required to address the congestion on the A167 from Nevilles Cross to Sniperley Roundabout? Please give reasons for your response.**

- a. There are no measures required**
- b. Yes. A Western Relief Road; or**
- c. Yes. An alternative proposal (please specify).**

- The money would be better spent on sustainable transport measures, including better provision for cyclists, a new rail station at Ferryhill or Langley Moor better bus links etc.
- An integrated public transport system would have more effect than building a bypass.
- Road Safety and congestion on the A690 near Stonebridge needs to be considered

#### Responses to main issues

- Traffic modelling shows that the A167 is currently the most congested part of the transport network in both the AM and PM peaks. The traffic on the A167 creates a barrier for traffic when entering or leaving the city at peak times with significant bottlenecks especially where the A690 and A691 join the A167 in the west of the city at the Nevilles Cross Junction and Sniperley Roundabout. The modelling predicts that congestion on the network will increase both as a result of predicted national increases in traffic and more localised increases as a result of proposed new development. Therefore to relieve congestion and to enable development to the west and north of the city to come forward a solution is required.
- In order to identify this solution the council therefore commissioned a feasibility study of possible highway improvements to the A167 corridor between Nevilles Cross and Sniperley roundabout. The objectives of the study were to try and improve journey times and reduce traffic congestion on the A167 in order to accommodate existing and future traffic.
- The study found that two lanes could be provided in a southbound direction for the entire length between Sniperley roundabout and Nevilles Cross but, due to physical constraints, in a northbound direction only a number of smaller measures to increase capacity were possible. The proposed improvements are estimated to around £6.9 million however the results of the modelling show no overall benefits to traffic movements on the A167.
- Given this absence of an effective alternative and the existing and future congestion there is therefore a requirement for the provision of a Western Relief Road (WRR). The relief road will allow traffic from the A690 and A691 to avoid bottlenecks thus reducing congestion for all users. The most significant reductions in traffic take place on the length of the A167 by-passed by the proposed Western Relief Road.
- The council recognises that the congestion is a peak hour issue. This is when there are most trips to work and education. The council have limited control on where parents send their children to school but the council are continually working with employers and centres of education to increase the mode share of sustainable modes of travel.

**Question 34 - Are measures required to address the congestion on the A167 from Nevilles Cross to Sniperley Roundabout? Please give reasons for your response.**

- a. There are no measures required**
- b. Yes. A Western Relief Road; or**
- c. Yes. An alternative proposal (please specify).**

- Encouraging use of more sustainable modes of transport is a key priority of the council and how we intend to do this in Durham City is set out in the Durham City Sustainable Transport Delivery Plan.
- The Council is always looking at ways to improve the Park and Ride service but surveys have shown that the intercept rates of park and ride will not be enough to ameliorate the traffic congestion on the A167. Also, origin and destination data allows us to understand that much of the traffic using Nevilles Cross is travelling to destinations in Tyne and Wear.
- The East Coast Mainline is nearing capacity and if a station was built at Brandon/Meadowfield/Langley Moor, it is unlikely that the council would be able to persuade any train operators to stop services at a station this close to the city.

### Supporting high quality infrastructure

#### Question 35 - Wind Turbine Development

**Question 35 - Should the Plan identify areas suitable for wind turbine development? If so, should the extent of areas be different for different sizes of turbine? Please give reasons for your response.**

Number of Representations in policy area

59

#### Summary of main issues raised by representations

- Some support for sustainable energy which will help reduce carbon emissions and develop renewable energy generating capacity.
- The Plan should identify areas suitable for wind turbine development, including areas for larger turbines (for large scale energy generation) and sites for small scale generation (mainly for "personal" use) on an individual basis.
- Different areas for different sized turbines sounds a sensible approach.
- Identifying suitable areas in the Plan would mean this could be seen and understood by the public in advance which would help avoid unpleasant surprises.
- We have to start doing something about reducing carbon emissions and wind turbines are the only realistic option in the short term.

**Question 35 - Should the Plan identify areas suitable for wind turbine development? If so, should the extent of areas be different for different sizes of turbine? Please give reasons for your response.**

- There should be a plan for wind turbines so that the required infrastructure is delivered to support the transition to a low carbon future. The landscape should be taken into consideration so it doesn't impact the uniqueness of County Durham.
- Wind turbines should be a decision made at local council and local residents discretion.
- Only if there is no funding from local or central government by ratepayer or taxpayer.
- The county already makes a significant contribution to wind-farm sites - no more needed - solar is less intrusive and can be added to individual houses in urban areas.
- Turbines adversely impact on the landscape to the detriment of both visitors and residents.
- The county has reached saturation point and no further sites should be allocated in the plan.
- The Plan should identify those areas which are suitable as it is unlikely that designation would be forthcoming from Neighbourhood Plans alone. The criteria to be used must be robust and command popular support.
- Wind generation is not a sustainable solution since we still need baseload generating capacity to supply demand when there is no wind and there is insufficient evidence to show that wind turbines are efficient forms of alternative energy.
- Solar is a better alternative to wind turbines.
- East Durham seems to have been heavily used, I suggest the vast areas of West Durham be examined in the interests of equality and fairness.
- No development should be allowed which interferes with long views of the World Heritage Site.
- The Plan should identify suitable areas provided it does not detract from an area of outstanding national beauty or impact others in the locality.
- The extent of areas should be different for different sizes of turbine to negate the negative aspects of wind turbines.
- There will be places where wind turbine development is unlikely to ever be appropriate and any zoning plan will need to recognise this as a core primary test.
- Wind energy is to be strongly preferred over fracking or any other carbon-based energy scheme.
- The council should work with local communities to identify as many areas as possible where new turbines could be situated.
- Climate change is one of the greatest long-term threats to wildlife, and renewable energy is an important part of the solution to tackling the threat.
- As well as identifying the least ecologically sensitive sites, it is important to identify opportunities for biodiversity enhancement alongside low carbon energy generation.

**Question 35 - Should the Plan identify areas suitable for wind turbine development? If so, should the extent of areas be different for different sizes of turbine? Please give reasons for your response.**

- Do not believe the extent of areas should be different for different sizes of turbine, because this pre-judges the size of turbine that is likely to be deployed and the performance and efficiency of wind technologies is constantly improving/evolving.
- The extent of suitable areas should be determined by an objective analysis of resource opportunity, physical constraints, policy constraints and ecological sensitivity.
- The approach provides an accurate overview of the Government's current position on planning for onshore wind turbine development in local plans and presents a logical conclusion.
- It is agreed that the approach should recognise the different scales of wind turbine development.
- Wind generation offers an outstanding opportunity to build on the county's heritage, built on hundreds of years of supplying energy through coal mining, by leading the country in the move towards renewable energy.
- Wind turbines or a wind farm would be a good idea between Ferryhill Business and Enterprise College and Kirk Merrington.

**Responses to main issues**

- A key objective of the Plan and the Sustainable Community Strategy is to mitigate the impact of climate change. Addressing climate change is of importance for sustainable development and a key priority of the National Planning Policy Framework (NPPF). We therefore need to encourage the prudent use of non-renewable resources, contribute to reducing emissions and stabilising climate change. Reducing carbon emissions therefore underpins every aspect of planning and helps support regeneration and improve the health and quality of life of everyone in County Durham. Climate change mitigation is therefore integrated throughout the Plan including by promoting renewable energy where appropriate.
- Current government policy is that local authorities should only grant planning permission for wind energy development involving one or more turbines if the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan. This applies to development of any scale requiring planning consent. If any further development of wind energy is to be accommodated in the county it is therefore necessary for the Plan to identify suitable areas.
- The suitability of an area to accommodate wind energy development in its various forms, from small scale single turbines to wind farms of larger turbines, depends on a number of factors. The Wind Turbine Evidence Paper contains a county-wide analysis of the main technical and environmental factors that can constrain the potential for the development of turbines of different sizes. This is not exhaustive, dealing only with those constraints that can be readily mapped at a strategic scale. The size ranges used in the analysis were based on development proposals that have come forward in the area in recent years:
  - Small - 11-25m in height;
  - Small-Medium - 26-40m in height;
  - Medium - 41-65m in height;

**Question 35 - Should the Plan identify areas suitable for wind turbine development? If so, should the extent of areas be different for different sizes of turbine? Please give reasons for your response.**

- Medium-Large - 66-100 in height; and
- Large - 100-136m in height.
- The Wind Turbine Evidence Paper also contains a landscape sensitivity study which analyses the potential sensitivity of different landscape types and character areas to wind energy development in these size ranges and the cumulative effects of any existing development in those areas. This was informed by the County Durham Landscape Character Assessment. The Wind Turbine Evidence Paper explores a range of alternatives for identifying suitable areas for wind energy development having regard to landscape sensitivity, the mapped technical and environmental constraints, and the cumulative effects of existing development. This analysis informed the identification of suitable areas for wind energy development of different sizes shown on the policies map document.

#### Requiring good design

#### Question 36 - Housing Developments and building for life

**Question 36 - Should we require new housing developments to meet the Building for Life 12 standard? Please give reasons for your response.**

Number of Representations in policy area

88

#### Summary of main issues raised by representations

Support for the proposed policy direction noted:

- Adopting the Building for Life Standards encourage the provision of well designed homes constructed to high standard - better homes = reduced costs in the long term.
- The fact the other authorities have adopted the Standards signals its attractiveness and Durham should match this to avoid poorly designed homes and sites.
- This reflects best practice defined by house builders and should be adopted as a standard to provide local communities with appropriate assurances about the robustness of development.
- Need to go further than BfL Standards in order to raise the quality of the built environment and to attract investment into the region. Consider the Passivhaus standard as well.
- Ensuring higher standards is an opportunity for developers to improve their reputation and build quality.
- Wider benefits to health by ensuring adequate social and amenity space, including opportunities for sustainable food production and supporting the full lifetime needs of generational living.
- An advantage of BfL is that it is a national standard so developers should be familiar with it which also saves the Authority from having to devise its own standards.

**Question 36 - Should we require new housing developments to meet the Building for Life 12 standard? Please give reasons for your response.**

- Poorly built schemes can be detrimental to visual identity which can cause untold cost to tourism of the area.
- Remove the number '12' from the policy and instead require the latest standard to future-proof the plan. Add a footnote to refer to the source of information as well as an entry to the glossary.
- Support application of this standard, but feel that it is insufficient on its own as the standard does not address various aspects sustainable design we consider an essential component of new development. For example, BfL fails to consider ecological enhancement, water conservation and use of sustainable construction materials.
- The policy should promote safety and security including through consultation with the police architectural liaison service.
- There is a need for more well-designed, low-energy homes and light commercial buildings in rural areas.
- Refurbishment of existing, older houses to ensure they are more energy efficient should form part of the mix and would contribute to achieving local and national carbon targets as well as generating more locally-based employment opportunities.
- The policy should promote and support community food growing.
- The council should offer incentives to builders to use brownfield sites. Greenfield sites should be more expensive for developers. Green Belt land should never be built on.
- The council should resist high density schemes on greenfield sites around large settlements as it only adds to urban sprawl and unsustainable travel. Higher densities may be appropriate in smaller settlements as it helps achieve a critical mass for supporting sustainable transport links.

Some respondents opposed the policy, for the following reasons:

- Building Regulations provide detailed requirements that developments must meet to provide accessible and inclusive housing for all ages and levels of mobility. It is not considered necessary or reasonable to impose additional requirements on developers within the planning system as this may lead to issues with viability and deliverability.
- It should be left to the discretion of developers to determine whether it is suitable, necessary and viable for their developments to meet these requirements.
- It would be prudent to not implement standards on the building industry that could impede the delivery of housing, especially given the concerns and uncertainty within the wider economy.
- Should the council wish to implement enhanced standards it is imperative that the additional costs of such standards to developers are considered when determining the extent of other planning obligations.

**Question 36 - Should we require new housing developments to meet the Building for Life 12 standard? Please give reasons for your response.**

- The guidance and standards in BfL, whilst useful, are more suited to larger sites. Many of the design principle proposed are not possible, or difficult to achieve on higher density, urban developments. Should the Council decide to stipulate a requirement to seek the BfL 12 standard, limiting it to sites over a certain size.
- It is not considered appropriate to apply a certain level of attainment to every site. It is recommended that BfL Standards be used as a framework to discuss design rather than a prescriptive policy requirement.
- An alternative option could be a development management policy with identified design criteria appropriate to County Durham.
- Mention is given to Secured by Design within the supporting text and the liaison service is promoted by the Development Management service.
- The Council are carrying out refurbishment of existing properties - to make them more energy efficient and improve the internal specifications - in several locations, for example Craghead and South Moor. This is heavily reliant on funding however which is currently limited. Social providers can also access funding for upgrades to stock. All new housing must be built to building regulations however the council actively encourage and support projects which seek to exceed these standards.
- The growing of local food is obviously applicable at allotments. The Open Space Needs Assessment (OSNA) informs the overall levels of Green Infrastructure required across the county. Allotment need is assessed within the OSNA and this will inform policies. Green Infrastructure therefore incorporates allotment provision within the County.
- The council have a register of suitable brownfield land to encourage the use of brownfield sites. The development strategy in the Plan favours brownfield land in the first instance and the government have announced funding for certain brownfield schemes which may aid this process. National guidance advised that Green Belt land may be developed for certain uses.
- The Plan is seeking to set down a strategy which will deliver development in sustainable locations, factoring in environmental considerations and viability amongst other matters. Density is linked to resource usage and while there is a general aim to ensure efficient use of land (to ensure sustainable development), this needs to be balanced against the design and character of a development and its surroundings, as well as viability and amenity considerations.

**Responses to main issues**

- The NPPF is clear that good design is indivisible from good planning so there is support for applying design standards within the Plan. The BfL standards are about improving the design and the way a development functions in terms of layout and linkages with the existing townscape, and compliment the 'fabric' requirements set down in Building Regulations (which do not cover external matters such as design, layout and character).

**Question 36 - Should we require new housing developments to meet the Building for Life 12 standard? Please give reasons for your response.**

- There are normally no cost differentials associated with the standard -improved design often means more efficient use of infrastructure, for example through rationalising access routes and creating 'cleaner' layouts. It is a fine balance between what can be stipulated through the planning system and what cannot, however the Council will seek the best standards that can be delivered and are viable.
- The BfL standard emphasises good design quality in the main. A policy will also be developed to cover general development principles to address issues including ensuring energy efficiency, maximising opportunities for renewable and low carbon energy generation, and efficient use of resources.
- The good practice guidance set down in the standards apply to all major developments, however the review process applies to larger schemes (normally of 50+ units). Smaller sites will be assessed where they are located in especially sensitive locations. The standards do facilitate discussion and negotiations however policy will require that schemes ensure the best possible design standards are achieved, taking into account site and scheme characteristics.
- A link has been added to the policy which provides further while explicit reference to the current version has been removed to provide a degree of longevity and relevance for the medium term and ahead of a plan review.

**Promoting healthy communities**

**Question 37 - Hot Food Take-aways**

**Question 37 - Should we seek to limit the number of hot food take-aways in some locations, for example in our town and local centres (where there is an over-concentration) and/or close to schools and colleges or does this unfairly prejudice commercial interests? Please give reasons for your response.**

Number of Representations in policy area

72

**Summary of main issues raised by representations**

- Hot food takeaways are associated with littering and anti social behaviour and should be restricted.
- There is an over concentration of hot food takeaways in some areas of the County.
- The numbers of hot food takeaways should be restricted near to educational establishments.
- Policies restricting hot food takeaways should be based on robust evidence.
- Childhood obesity is becoming an increasing burden on health services.
- There is over concentration of hot food takeaways in Ferryhill town centre.
- Co-ordinated approach to tackling obesity is required.
- Need to maintain and increase retail diversity within town centres.

**Question 37 - Should we seek to limit the number of hot food take-aways in some locations, for example in our town and local centres (where there is an over-concentration) and/or close to schools and colleges or does this unfairly prejudice commercial interests? Please give reasons for your response.**

- Consideration should be given to the opening hours of hot food takeaways.
- Should be a degree of flexibility to provide active uses in areas where other uses are not in demand.

#### Responses to main issues

- Amenity issues such as noise will be considered through a specific policy on hot food takeaways.
- Policy on hot food takeaways will only allow new hot food takeaway uses where the proposal would not result in more than 5% of the premises being in hot food takeaway uses within in our defined town centres.
- In order to promote healthy lifestyles in young people, proposals for hot food takeaways within 400m of an existing or planned school or college building will not be permitted.
- Proposed policy on hot food takeaways will be based on an evidence paper, this provides evidence that in areas of the County where there is a density of hot food takeaways, there are health and obesity issues amongst young people.
- It is noted that Ferryhill town centre has a high concentration of hot food takeaways, the proposed policy will only allow further hot food takeaways where this would not result in more than 5% of the premises within Ferryhill town centre being in such a use. It is understood that current levels are above 5%.
- The policy on hot food takeaways is part of co-ordinated approach working with Public Health to reduced obesity.
- Restricting to hot food takeaways to no more than 5% within town centres will promote a greater diversity of uses within town centres.
- Opening hours of hot food takeaways are considered through the Development Management process and would need to accord with the policy in relation to amenity.
- The threshold of 5% within the policy is considered to provide an appropriate balance of providing such facilities whilst guarding against potential issues of vacancies within our centres.

#### Meeting the challenge of climate change, flooding and coastal change

#### Question 38 - Water management and flood risk

**Question 38 - Do you agree that we need to address all areas of water management including flood risk? Please give reasons for your response.**

Number of Representations in policy area	83
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**Question 38 - Do you agree that we need to address all areas of water management including flood risk? Please give reasons for your response.**

#### Summary of main issues raised by representations

- Almost all of the respondents agreed that we need to address all areas of water management, particularly flood risk.
- Development, particularly on greenfield sites, should not increase flood risk elsewhere.
- Water management needs to be addressed, to protect the environment, safeguard property and ensure any developments are cost effective (in relation to capital and maintenance costs). Maintenance and repair of our water environment is key.
- Building and development should not take place in areas at risk of flooding.
- During the construction of developments measures should be taken to ensure there are no unacceptable discharges to surface and groundwater which could affect water quality.
- The practicality and viability of providing new developments with a water supply and dealing with waste water needs to be addressed and managed.
- New development should limit the extent of hard standing and manage any extension of impermeable surfaces associated with existing developments.
- New innovative solutions to flood risk should be explored for example holding water back in the upland areas or other areas that can hold large quantities of flood water in order to protect built areas or the role which trees and woods can play in improving water quality and helping to alleviate certain types of flooding.
- The Council should adopt a catchment based approach to water management.
- Concern that the Council does not have adequate flood risk information, sufficient historic data and does not properly account for global warming/climate change.
- More resources should be spent on maintenance and drain clearance.
- New development should not be expected to solve existing problems.
- Water management can have significant implications for birds and any water management proposals should consider the implications for wildlife (both beneficial and detrimental).
- Some respondents identified specific areas of flooding which had occurred.

#### Responses to main issues

- The policies have been developed to address all forms of water management and flood risk including river, surface water, groundwater and sewer flooding, as well as the provision of flood defences, sewage treatment works, provision of water to new developments and the management of waste water.

**Question 38 - Do you agree that we need to address all areas of water management including flood risk? Please give reasons for your response.**

- The policy has been developed to ensure that the runoff rates should not exceed and where possible should reduce the existing greenfield runoff rate. On previously developed land, as close as practicable to a greenfield rate must be achieved or a betterment rate agreed with the council. In some instances development can be used to manage an existing surface water runoff problem. The council have adopted guidance on the provision and ongoing maintenance of Sustainable Drainage Systems within new development which is referenced in the policy.
- The policy has been developed to ensure that all development proposals will be required to consider the affect of the proposed development on flood risk, both on-site and off-site and taking into account the predicted impacts of climate change. In County Durham flood risk is mainly fluvial, from rivers and watercourses, although we are seeing increasing events of surface water flooding due to climate change and development pressure which is reflected in the policy.
- National Policy is clear that planning policy should minimise vulnerability and provide resilience to impacts arising from climate change and avoid inappropriate development in areas at risk of flooding, which is primarily done through sequential/exception testing in line with National Planning Policy Framework (NPPF) Technical Guidance. Where there is a possibility of any flood risk to a proposed development site, or the potential for flood risk impact on other sites, a site-specific Flood Risk Assessment will be required, once it has passed the sequential and exception test. The sequential test can also be used to inform site layout by locating the most vulnerable elements of a development in the lowest risk areas as well as building in resilience into a site's design, for example through raised floor levels or dry pedestrian access routes. A sequential test has been carried out on all of the housing and employment sites which have been assessed for allocated in the plan and development has been located in the areas at least risk of flooding.
- The policy recognises that it is important to consider the protection of water resources from pollution particularly when assessing any development that has the potential to adversely affect water quality either above or below ground. The policy also recognises that Sustainable Drainage Systems and green infrastructure can also prevent pollution by filtration of surface water runoff thereby contributing to improvements in the quality of watercourses in line with legislation.
- The Water Cycle Study for the county looks in more detail at the practicality and viability of providing new developments with a water supply and dealing with waste water, this document has been used to inform the policy and sites for allocation within the Plan.
- As mentioned in bullet point 2 new development will need to demonstrate that surface water run off is properly managed, which will include the use of permeable rather than impermeable surfaces. Within the General Permitted Development Order - Class F (Hard surfaces incidental to the enjoyment of a dwelling house) the extension of impermeable surfaces requires planning permission unless it includes strip drainage to soak away within the curtilage of the site or a permeable surface is used. This is to discourage the use of impermeable surface materials.
- The policy recognises that green infrastructure can be an important flood management, climate change and flood mitigation mechanism as well as providing benefits for communities, wildlife, biodiversity and ecological networks. It is acknowledged that SuDS and green infrastructure can also prevent pollution by filtration of surface water runoff thereby contributing to improvements in water quality. The supporting text of the policy highlights that emerging evidence from the Woodland Trust and Manchester University states that the planting of trees or woods in the right locations can bring about improvements in water quality of 90% and can also alleviate certain types of flooding. The supporting text for the Trees, Woodlands and Hedges policy states that

**Question 38 - Do you agree that we need to address all areas of water management including flood risk? Please give reasons for your response.**

trees, woodlands and hedges make an important contribution to the beauty, diversity and distinctiveness of our rural landscapes and the beauty and livability of our townscapes. Tree and woodland canopies create shelter and shade, intercept rainfall and airborne pollutants and regulate the movement of water through river catchments, reducing soil erosion and the leaching of pollutants into surface and grounds waters. This helps to regulate local temperatures and climate change impacts.

- The Water Cycle Study, which is part of the evidence base that informs the water management policies, identifies and the catchment level management plans and provides guidance on how to steer development away from high flood risk areas within these wider catchment areas. The council will continue to work with neighbouring Authorities to look at catchment wide water management and work on cross boundary projects in order to make a positive contribution to cross boundary water management issues.
- The policy has been drawn up using a number of evidence bases including the Strategic Flood Risk Assessment (SFRA) which provides an overview of the areas susceptible to flooding and the risk posed by flooding from rivers, the North Sea, groundwater and surface water runoff. The SFRA assesses the risk at the time it was prepared, this includes any historical flood risk data available, as well as the increased risk from a number of factors including a changing climate and the construction of new development. This takes into account updated Environment Agency flood maps which include changes to flood zones 2 and 3, together with up to date climate change allowances. Proposed sites allocated for development have been assessed against these current flood maps to avoid inappropriate development in areas at risk of flooding.
- The policy looks to address all forms of flood risk including river, surface water, highway and sewer flooding. Ongoing maintenance and drain clearance is coordinated through the Drainage and Coastal Protection Team in partnership with other water management organisations as appropriate.
- Developers are expected to use Sustainable Drainage Systems as part of any development proposals, which may provide opportunities to address localised issues in partnership with water management organisations.
- The policy recognises that green infrastructure can be an important flood management, climate change and flood mitigation mechanism as well as providing benefits for communities, wildlife, biodiversity and ecological networks. This policy is supported by other environmental policies within the plan which specifically look at protecting and enhancing wildlife and their habitats.
- Specific incidences of flooding cannot be addressed by the Plan however they have been passed to the Drainage and Coastal Protection Team for further investigation.

## Conserving and enhancing the natural and historic environment

### Question 39 - Proposed strategy to conserving and enhancing the natural and historic environment

**Question 39 - Do you agree with our proposed strategy to conserving and enhancing the natural and historic environment? Can you suggest any alternatives? Please give reasons for your response.**

Number of Representations in policy area

94

#### Summary of main issues raised by representations

The majority of respondents supported the need for policies addressing the natural and historic environment and the following comments were given:

- The natural and historic environment is one of the county's greatest assets and must be protected & enhanced.
- The Plan should ensure equal coverage for natural and built heritage assets.
- The strategy should include Green Infrastructure to assist wildlife in line with any recommendation from the Local Nature Partnerships.
- Green Infrastructure that contributed to protecting and enhancing wildlife corridors, water bodies, provision of parks and gardens. amenity open space, formal and informal recreation and community food growing space would also be welcomed.
- Support given to the intention to have policies protecting the natural and built environment however they should be at the front of the document to reflect their importance.
- The acknowledgement of the value of ecosystem services, contribution to economic value is welcomed. The economic health of the County depends on recognising that a well-tended landscape and attractive well-maintained buildings generate prosperity both for residents and visitors.
- If tourism is to be encouraged this strategy is essential. For anyone living, working or having strong ties with the county, its natural and historic environment are at its very core; conservation is key to their survival.
- There is a risk that the "ordinary" 70% becomes invisible/low priority if there is too much concentration on priority areas - for example some urban/agricultural fringe areas which have been degraded. The CDP should enhance 'all' rather than just 'valued' landscapes. Greenfields around and between towns and villages are important and help keep individual settlement identities, prevent coalescence and provide an important physical and visual break between the built environment and natural environment, provide wildlife corridors, enhance biodiversity and enhance the areas where residents live.
- The 'Catchment Based Approach' used for improving river catchments in the county could provide a useful fora to contribute to such a positive strategy. The CDP should recognise the critical importance of rivers and the benefits they provide including supporting tourism and the economy. Development should not cause deterioration of water courses.
- The strategy should reference the needs of people with physical or sensory disabilities and an acknowledgement under Disability Discrimination legislation that reasonable adjustments should be made to facilitate access.

**Question 39 - Do you agree with our proposed strategy to conserving and enhancing the natural and historic environment? Can you suggest any alternatives? Please give reasons for your response.**

- A strategy for conserving the natural and historic environment is supported however it should not be at the expense of good, innovative design in new development. Development should create a strong sense of place and compliment local character without falling into pastiche.
- The CDP should align policies with the guidance in the NPPF, and in particular provide coverage for designated as well as non-designated assets. Development proposals in the CDP must assess potential impacts on heritage assets.
- The identification of any local environmental designations, including gaps and separation policies, must be predicated on a robust and comprehensive evidence base that can be used in the planning balance advocated by the Framework.
- Policies that represent a blanket approach to development outside of the defined settlement policy boundaries do not accord with the presumption in favour of sustainable development set out in the Framework. Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125.
- County Durham has a variety of habitats of importance for birds. The Council should familiarise itself with important areas e.g. by considering the numerous records held by organisations in the area.
- The CDP could be more ambitious in this topic area and include mention of the role that various areas, such as Teesdale, has to play in the economic regeneration of the County. Major developments should, as a matter of course, look to providing homes for nature e.g. by providing nest boxes on buildings and suitable habitat.
- Conservation Area Character Appraisals and Conservation Plans need to be produced for all Conservation Areas (plus any others that are created in the lifetime of the plan) - Article 4 Directions should be considered which will help to conserve and enhance the designated area and its setting.
- The policies in the withdrawn Plan met with broad agreement and may usefully form the basis for the new plan. Policy covering heritage assets should set a higher test in relation to Grade I listed buildings to recognise their special status and rarity. Any policy covering the World Heritage Site should include a requirement for proposals to demonstrate that the development will cause no harm to the significance of the WHS (including cumulative or consequential harm) including through impacts on its appearance, fabric, character or setting. In drawing up policies regard should be had of the Historic England Advice Notes and guidance on the historic environment and site allocations in local plans.
- Several comments were received relating to specific areas and assets within the County, which were considered to variously warrant further promotion, acknowledgement, and, protection within the Plan. These include the World Heritage Site, Barnard Castle, the viaduct at Rainton Park Wood, the Carrs Nature Reserve in Ferryhill, the viaduct at Rainton Park Wood, Coxhoe Wildlife Site, the Stockton and Darlington Railway, and, the North Pennines AONB.

**Question 39 - Do you agree with our proposed strategy to conserving and enhancing the natural and historic environment? Can you suggest any alternatives? Please give reasons for your response.**

- Beaufort was identified as requiring attention as it suffers regular incidences of vandalism and anti-social behaviour. A long term strategy needs to be agreed to hopefully get the site removed from the 'at risk' register, maintained and provide a unique interpretation for visitors.
- Greater effort needs to be made to restore and maintain sight lines (by planning and tree management) of the World Heritage site. The council needs to work with the university to provide a single site art gallery in or very near the World Heritage Site for displaying the university's diverse collection as well as hosting national scale touring exhibitions.
- It was also noted that protection should include Green Belt land and areas impacted by the development strategy of the Plan including the Western Relief Road. The CDP need to mitigate the impact of Climate Change on local biodiversity, and fully compensate the impact that will be created by house building and highways development, especially in the mature River Wear Corridor. Strategic measures should be implemented, such as Landscape Scale habitat regeneration, as well as a Green Infrastructure Strategy. The Council should make a full commitment to the implementation of such strategic measures and not simply address these issues in a piecemeal manner in association with individual development applications.
- County Durham as a whole is sparsely populated in comparison with other counties, and to maintain quality of life for present and future generations (as well as tourism potential), nothing should be done, or only limited, well thought out developments which will enhance the environment should be considered / promoted.
- The Plan mentions there are only 17 Parks and Gardens which should be re-examined for future generations. A local list should be developed for houses and buildings of special interest.
- The importance of cross boundary links where highlighted for ecological networks, habitats, cycle ways and footpaths.

**Responses to main issues**

- County Durham has a wealth of attractive natural and built (historic) assets which present unique opportunities for residents, businesses and visitors. The Plan will set policies which balance the protection and enhancement of these assets, alongside the requirement for new development to meet our need for new homes and jobs. Environmental Impact Assessment will be required as part of any future planning applications for major development proposals such as new roads. In terms of allocations this process is informed by a range of considerations including potential impacts on heritage assets to determine the acceptability of sites for development.
- The plan policies will be in general alignment with national guidance and will provide greater emphasis on the different types of assets within the county and the level of protection afforded to them. The council are working through a programme of preparing Conservation Area Assessments for our conservation areas as part of a positive strategy to sustain and enhance heritage assets.
- The policies within the Plan recognise that in the past there has been an emphasis on identifying and protecting high quality landscapes, but that in recent years there has been an increasing recognition that all landscapes matter and that their sensitivity to development depends on their character. The policy is based on a character-led approach to all landscapes, of whatever quality,

**Question 39 - Do you agree with our proposed strategy to conserving and enhancing the natural and historic environment? Can you suggest any alternatives? Please give reasons for your response.**

whether urban or rural, built or natural. There will also be policies within the Plan which look at protecting Biodiversity and Geodiversity as well as Water Management, which looks to protect, manage and improve the water environment. We will continue to work with the Catchment Partnerships to ensure the policies within the Plan cover all pertinent issues.

- The important contribution green infrastructure can bring to assist wildlife will be highlighted in a number of policies throughout the Plan. The importance of the county's natural and historic environment will also be highlighted within the Visitor Attractions and Accommodation policies.
- The plan has been amended to include reference to addressing the needs of the disabled which will provide an overarching principle across all policies within the plan. The Sustainable Design policy also makes specific reference to ensuring convenient and attractive access for all users whilst prioritising the needs of pedestrians, cyclists, public transport users and for disabled people.
- The Plan will include a policy specifically related to Trees, Woodlands and Hedges. The policy will refer to support of new woodland creation. We will continue to work with the Woodland Trust on woodland creation initiatives. The Plan will include the promotion of SuDS and the use of green infrastructure which can help with the filtration of surface water runoff thereby contributing to improvements in the quality of watercourses in line with legislation including the Water Framework Directive objectives.
- We will continue to consult and engage with local groups and communities as well as Town and Parish Councils at each stage of the Plan preparation process to ensure policies address relevant issues and are bolstered by local knowledge.
- There will be policy coverage for the Historic Environment, the WHS and the site of the historic Stockton and Darlington Railway. The policy for the historic environment will align with NPPF guidance and the tests in relation to Grade I listed buildings will reflect their significance. There will be specific policy relating to the Durham Cathedral and Castle World Heritage Site. A Management Plan is in place to manage the setting of the World Heritage Site. A policy will be developed in the Plan requiring those proposing development that affect the WHS to reference key documents including the Management Plan, helping to conserve and enhance the site. A policy will be prepared for the Stockton and Darlington Railway to recognise its importance and the need for a consistent policy coverage given that it straddles three local authority areas.
- The plan will ensure the protection and enhancement of the natural and historic environment including a specific policy relating to the AONB and its UNESCO Global Geopark status.
- The council is aware of the issues at Prior's House and the chapel of Beaurepaire and work is ongoing to resolve them.
- Ferryhill Carrs is protected through a number of local and national designations, including Local Nature Reserve, SSSI, Local Wildlife Site and Ancient Woodland. These designations are protected through policies in the Plan, they will be clearly shown on the Proposals Plan and because of the sensitivities and designations on site any development in the vicinity of the site would require buffering. A management plan is being delivered for the site.

**Question 39 - Do you agree with our proposed strategy to conserving and enhancing the natural and historic environment? Can you suggest any alternatives? Please give reasons for your response.**

- In terms of fly-tipping and anti-social behaviour this is something the council seeks to prevent through a multi-agency approach including education programmes and penalties for those responsible. Management Proposals are specific to each conservation area however they can include measures such as promoting active maintenance of buildings through advice and help with investigating grant funding.
- Connectivity between wildlife and nature sites is often difficult to ensure however it is something the council promotes through green infrastructure policy and related projects.
- The 17 Registered Parks and Gardens are designated by Historic England and as such only they can review and add to the list of designated sites. Notable unlisted buildings are identified within our Conservation Area Character Appraisals, within Neighbourhood Plans and non-designated heritage assets will be protected through the Historic Environment policy within the Plan
- The council will continue to work with neighbouring authorities to look at cross boundary links.

**Facilitating the sustainable use of minerals**

**Facilitating the sustainable use of minerals**

Number of Representations in policy area

12

**Summary of main issues raised by representations**

- The Plan needs to address surface coal resource, prior extraction and also coal mining legacy issues.
- Minerals and waste policies should take into account consequential risks to surface and ground water quality.
- Support for the preparation of a Mineral and Waste Policies and Allocation document.
- Suggested minor wording changes needed in relation to how minerals are described.
- Support for the preparation of a separate Minerals and Waste Policies and Allocations document.
- Should consider options for leaving minerals in the ground. Extraction is considered contrary to sentiments expressed elsewhere in the document.
- Concern over the approach to fracking. How can the council suggest that it has an interest in the environment when it is so open to environmental destruction?

**Responses to main issues**

### Facilitating the sustainable use of minerals

- The existing County Durham Waste Local Plan contains a number of policies relating to the protection of surface, coastal and groundwater and the policies map which accompanies it includes aquifer protection designations. These water related policies will be saved until they are replaced by the policies of the Minerals and Waste Policies and Allocations document.
- The Plan addresses surface coal resource and prior extraction as part of the approach to addressing mineral safeguarding. The Plan also addresses coal mining legacy issues.
- Support for the preparation of the Minerals and Waste Policies and Allocations document is welcomed.
- Non strategic minerals and waste sites are sites which are not fundamental to the delivery of the development plan strategy for the winning and working of minerals and waste management.
- As mineral planning authority the council is required to prepare policies for minerals of national and local importance. The Plan policies strike the balance between ensuring a steady and adequate supply of minerals whilst seeking also to protect and enhance the environment.

### Question 40 - Magnesial Limestone

#### Question 40 - Given the extent of permitted reserves of magnesial limestone, do you agree that no further sites for new working are required?

Number of Representations in policy area	23
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#### Summary of main issues raised by representations

- Recognition that County Durham has a large landbank of permitted reserves of magnesial limestone for aggregate uses it is considered that the emerging policy needs to include a degree of flexibility to support proposals that would help to maintain a steady and adequate supply to meet both local and wider needs.
- Do not agree that no further working is justified. The Issues and Options document and supporting reports, indicate that the consented reserves of magnesial limestone in County Durham are currently in a healthy condition. However, the Plan should give due consideration to the NPPF (para 145) and Planning Practice Guidance advice on landbanks.
- Permitted reserves are sufficiently extensive that no further sites for new working are required at this stage. This position needs to be kept under constant review, not least given that this mineral resource is acknowledged to be of national and regional importance.
- Do not agree that no further sites for new working of magnesial limestone are required as further sites are required for the production of high specification agricultural lime for export to continental Europe. Agricultural lime is an industrial mineral and therefore, unlike aggregates, there is no requirement to consider and/or assess 'need' for the mineral. Consequently the questions of landbank, production and consumption are not relevant.
- The extent of the existing/proposed sites is already substantial, creating almost a 'super quarry' the cumulative impact of which is unknown. It is essential to ensure the outcrop/escarpment provides sufficient recharge of the aquifer to maintain and not adversely impact these third parties (users of groundwater) and their supplies.

#### Question 40 - Given the extent of permitted reserves of magnesian limestone, do you agree that no further sites for new working are required?

- With the rising mine water, it is becoming increasingly more difficult to maintain the vertical downward gradient from the Permian Limestone, to the Permian Sands and to the Carboniferous Coal Measures which is required to prevent further deterioration in groundwater quality in the Magnesian Limestone Aquifer.
- The Issues and Options paper does not provide clear information about the location of the current permitted reserves of magnesian limestone in order to agree that no further sites are required.
- Magnesian Limestone grassland is very rare and County Durham is noted for it and the flora and fauna that are present there. Not allowing any more quarries would conserve this landscape and contribute to this aspect of the Action Plan.

#### Responses to main issues

- As Mineral Planning Authority the council has a duty to facilitate the steady and adequate supply of aggregates. In doing so the council will have full regard to all available evidence and national policy and guidance.
- The latest Joint LAA reports on operator progress to reactivate a number of inactive magnesian limestone sites including Witch Hill Quarry, Cornforth West Quarry, Cornforth East Quarry and Hawthorn Quarry and Council decisions to extend the time period for mineral working at Thrislington West Quarry to 2030 and Coxhoe Raisby Quarry to 2042. This progress will provide greater certainty and ensure that minerals are accessible and available for use should operators decide to continue working individual quarry's.
- The Plan sets out the policy decision making framework for the consideration of future planning applications for crushed rock including magnesian limestone for aggregates purposes and agricultural lime.
- On the basis of available evidence the council does not consider that there is likely to be a shortage of magnesian limestone aggregate or agricultural lime during the Plan period.
- The council does not consider agricultural lime to be an industrial mineral. It is not listed or referred to as an industrial mineral in paragraph 146 of the NPPF.
- Through the determination of mineral planning applications the council will consider impacts on groundwater quantity and quality.
- The Issues and Options Paper included clear references to the two key evidence base documents underpinning the emerging minerals policies of the Plan. The site which lies near to the Durham Coast SAC and the Northumbria Coast SPA is Hawthorn Quarry, which as an existing mineral site (with a number of different overlapping permissions) falls outside of the local plan process. Subject to a new scheme of working and restoration conditions being agreed by the council working at this site could resume.

**Question 40 - Given the extent of permitted reserves of magnesian limestone, do you agree that no further sites for new working are required?**

- The restoration of magnesian limestone quarries is a mechanism which can create the conditions for new areas of Magnesian Limestone grassland.
- The council considers that the winning and working of minerals is an important industry in County Durham providing both direct and indirect employment and wider economic benefit to the County and the north east of England as a whole through the supply of aggregates and other minerals to the construction, industrial and farming sector. The Business Monitor PA1007, "Mineral Extraction in Great Britain" published by the Office for National Statistics (ONS) indicated that 467 jobs were provided by mineral extraction in County Durham in 2014.

**Question 41 - Carboniferous Limestone**

**Which option do you prefer for the location of new Carboniferous Limestone workings?**

- a. Only outside of the North Pennines AONB and in areas not subject to international or national biodiversity designations;
- b. As (a) but in addition proposals for extensions to existing quarries and the reworking of former carboniferous limestone quarries within the AONB which have not been restored properly (provided they also create or safeguard employment, do not have an adverse impact on European sites and provide substantive landscape, biodiversity and geodiversity benefits) should also considered; or
- c. Other, please specify.

Number of Representations in policy area	26
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**Summary of main issues raised by representations**

- An almost equal number of respondents favoured options a and b. A small number of respondents favoured Option c.
- There should be no new workings at all. Any new extraction sites would have significant environmental impacts and should be rejected. The council should take a longer-term view in terms of responding to the increasing scarcity of this resource.
- The natural features that make the North Pennines a special landscape are recognised not only in its Area of Outstanding Natural Beauty designation but by UNESCO's rare accolade of Global Geopark. Yet for centuries the area has also been an industrial environment and there is no reason why continued mineral extraction should jeopardise the unique character of the North Pennines provided it is carefully managed to reconcile any conflicting interests.
- It will not always be practical to source minerals from outside designated areas as minerals can only be worked where they are found. The EC Guidance (2010) on undertaking new non-energy extractive activities in accordance with Natura 2000 requirements is clear, in that it states that there is no automatic exclusion of non-energy extractive industry activities in and around Natura 2000 designations.
- An important consideration for the County Durham Plan will be whether an appropriate supply and landbank can be maintained outside of the AONB.

**Which option do you prefer for the location of new Carboniferous Limestone workings?**

**a. Only outside of the North Pennines AONB and in areas not subject to international or national biodiversity designations;**

**b. As (a) but in addition proposals for extensions to existing quarries and the reworking of former carboniferous limestone quarries within the AONB which have not been restored properly (provided they also create or safeguard employment, do not have an adverse impact on European sites and provide substantive landscape, biodiversity and geodiversity benefits) should also considered; or**

**c. Other, please specify.**

- With regards to the protection of water resources we have no preference for locations inside or outside the AONB. Preference for new applications rather than extensions if vertical extensions were proposed, which could take operations below the water table. Prefer working of sites that pose a low risk to water dependent features – ideally worked above the water table, in areas of limited private water supplies.
- There are many abandoned un-restored mineral extraction and processing sites in the North Pennines AONB. These sites are usually visually intrusive and often dangerous. Restoration of these sites would however be very costly and as such it is unlikely to occur. Option B would enable restoration to be funded through associated mineral extraction. Not only would this lead to substantial benefits for the landscape through the removal of the visual impact of the abandoned workings but would also lead to other benefits including the creation of significant habitats, increased biodiversity and geodiversity and increased or safeguarded employment.
- Heights Quarry is located in the AONB and the proposed western extension at Heights Quarry was previously acknowledged by Durham County Council to be strategically important. There may also be potential longer term for an extension to the east of Heights Quarry where an Area of Search is suggested which would be refined by future drilling investigations.
- At Hulands Quarry there is potential for an eastern extension to ensure continuity of supply at the strategically positioned site which has played a vital role in supplying aggregates and asphalt to the Highways England Leeming to Barton A1 Motorway upgrade project.
- The emphasis should be on ensuring that there is no biodiversity or landscape quality loss within the AONB. Whilst proposals might be made, the test against other policy especially with reference to S41 lists of Habitats and species under the NERC Act should be thorough in determining appropriateness. Biodiversity offsetting must be a genuine option within any further applications in or affecting the AONB.
- Mineral working may have impacts on important bird habitats, but restoration could have a beneficial impact in providing habitat for biodiversity generally and birds in particular.
- Welcome the intention to safeguard areas subject to national and international designations from new allocations and would welcome clarification from the council about how these existing consented sites will be treated.
- There may be a need for limited extraction to provide traditional materials from within the AONB area. There should be a plan for the reclamation of redundant quarry's.

**Which option do you prefer for the location of new Carboniferous Limestone workings?**

**a. Only outside of the North Pennines AONB and in areas not subject to international or national biodiversity designations;**

**b. As (a) but in addition proposals for extensions to existing quarries and the reworking of former carboniferous limestone quarries within the AONB which have not been restored properly (provided they also create or safeguard employment, do not have an adverse impact on European sites and provide substantive landscape, biodiversity and geodiversity benefits) should also considered; or**

**c. Other, please specify.**

**Responses to main issues**

- As mineral planning authority the council has a duty to ensure the steady and adequate supply of crushed rock which includes in County Durham, carboniferous limestone. In addition the council seeks to facilitate the efficient use of minerals and the use of recycled aggregates.
- The North Pennines history of a living countryside which has accommodated mineral working and mineral working contribution to the economy is noted.
- The Plan will set out the decision making framework for the determination of planning applications for carboniferous limestone working taking into account national policy and guidance and available evidence including the Joint Local Aggregate Assessment for County Durham, Northumberland and Tyne and Wear. In accordance with the requirements of the NPPF great weight will be given to the benefits of mineral extraction including to the economy and it is proposed that a policy will be prepared upon this within the Minerals and Waste Policies and Allocations Document. Consistent with paragraph 144 of the NPPF, the policy relating to meeting the need for primary aggregates extraction will set out the spatial approach for further working of carboniferous limestone over the plan period. Other policies within the Plan will also address this should planning applications be made within or in locations which impact upon designated sites such as the AONB and internationally and nationally designated nature conservation sites.
- Impacts on the water environment are always considered when mineral planning applications are determined.
- In relation to the "many abandoned un-restored" mineral extraction and processing sites in the AONB, the council would welcome details of other sites (which do not have planning permission or are dormant) that the proposer considers could be restored through associated mineral extraction.
- The council has considered all operator proposed sites for new mineral working including proposals by Aggregate Industries and Breedon. The results of the assessment are reported in the Local Plan Preferred Options and the Technical Consultation Report : New Minerals and Waste Sites in County Durham (June 2018).
- Once adopted the Plan and the Minerals and Waste Policies and Allocations document will provide the decision making framework for the determination of all mineral planning applications. Policies will be prepared which will allow the consideration of all relevant impacts including both landscape and biodiversity.
- A policy on the restoration of mineral sites will also be prepared.

**Which option do you prefer for the location of new Carboniferous Limestone workings?**

**a. Only outside of the North Pennines AONB and in areas not subject to international or national biodiversity designations;**

**b. As (a) but in addition proposals for extensions to existing quarries and the reworking of former carboniferous limestone quarries within the AONB which have not been restored properly (provided they also create or safeguard employment, do not have an adverse impact on European sites and provide substantive landscape, biodiversity and geodiversity benefits) should also considered; or**

**c. Other, please specify.**

- There are ten former carboniferous limestone sites which have been identified as dormant under the Environment Act 1995 and one further site registered as an Interim Development Order under the Planning and Compensation Act 1991 (see table A5 and A6 of the Joint Local Aggregate Assessment for County Durham, Northumberland and Tyne and Wear. In theory, subject to a new scheme of working and restoration being agreed by the council, working at these sites could resume. Other than Harrowbank and Ashy Bank Quarry, the council is not aware of any interest in the working of any of these former sites.
- Other than one proposal, the council is not aware of any other interest by an operator in the reworking of redundant carboniferous limestone quarries in the North Pennines, and would question the need for a specific plan on this subject.

**Question 42 - Dolerite**

**Question 42 - Given the extent of permitted reserves of dolerite do you agree that no further working is justified?**

Number of Representations in policy area	15
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**Summary of main issues raised by representations**

- Agree with the assessment of current reserves and the proximity of the resource to a designated site. It is considered that a policy on this could set out circumstances where proposals for extraction of this mineral for aggregate use will be supported.
- Disagree that 'no further working is justified'.
- Note that there are at least 4 existing permitted sites for dolerite extraction which threaten a number of internationally important sites. From the information currently available it is not possible to tell whether the reliance on permitted reserves includes these sites.
- Three of the existing consents are currently dormant. It is not clear how these existing sites will be treated.

**Responses to main issues**

- The council is required to seek to maintain a steady and adequate supply of aggregates.

#### Question 42 - Given the extent of permitted reserves of dolerite do you agree that no further working is justified?

- The Plan sets out the decision making framework for the determination of planning applications for dolerite working taking into account national policy and guidance and available evidence.
- The Plan also sets out how planning applications that are made within or in locations which impact upon designated sites such as the AONB will be assessed.
- The Minerals and Waste Technical Paper and the Joint Local Aggregate Assessment for County Durham, Northumberland and Tyne and Wear contain comprehensive information upon mineral resources and mineral working in County Durham including dolerite. In meeting future needs for dolerite, the council places reliance only upon Force Garth Quarry. This is because it has been an active mineral site for many years and because it contains a sizeable quantity of permitted reserves. No interest or proposals have come forward for reactivating any of the other sites, if interest was shown an assessment under the Habitats Directive would be required.

#### Question 43 - Sand and Gravel

##### Question 43 - If the Plan allocated sites for longer term working should we consider:

- Proposals to deepen existing magnesian limestone sites where basal permian sand lies beneath the existing quarry void at accessible depths;
- Proposals to laterally extend existing magnesian limestone sites where basal permian sand lies at accessible depths;
- New sand and gravel sites, working fluvial or glacial sand and gravels wherever the resource occurs;
- New sand and gravel working fluvial or glacial sand and gravels in locations outside of environmentally important areas and in locations in close proximity to markets e.g. Central Durham and the Tyne and Wear and Tees Valley conurbations; or
- Disagree, there is no need to allocate new sites.

Number of Representations in policy area	21
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##### Summary of main issues raised by representations

- The majority of the small number of respondents supported option a. Option b also had some support.
- Options c and d had some support from those who had concerns regarding further sand extraction from basal permian sands because of potential impacts on groundwater quantity and quality.
- Recognise the significant contribution that sand and gravel from quarries in County Durham make to the supply in the wider region.
- Approach should recognise this and include a degree of flexibility to ensure a steady and adequate supply and an appropriate landbank is maintained.
- Support an approach for longer term working of sand and gravel in County Durham which takes into account accessibility to markets whilst avoiding environmentally important areas.
- The decision for the longer term planning for sand and gravel should take in to consideration the range of types of aggregates, locations of permitted reserves relative to markets, and

**Question 43 - If the Plan allocated sites for longer term working should we consider:**

- a. Proposals to deepen existing magnesian limestone sites where basal permian sand lies beneath the existing quarry void at accessible depths;
- b. Proposals to laterally extend existing magnesian limestone sites where basal permian sand lies at accessible depths;
- c. New sand and gravel sites, working fluvial or glacial sand and gravels wherever the resource occurs;
- d. New sand and gravel working fluvial or glacial sand and gravels in locations outside of environmentally important areas and in locations in close proximity to markets e.g. Central Durham and the Tyne and Wear and Tees Valley conurbations; or
- e. Disagree, there is no need to allocate new sites.

productive capacity of permitted sites; and distinct and separate market for the specific types of aggregate.

- Whilst recognising that there are currently significant permitted reserves of sand and gravel further sites need to be allocated and the preference is that this should be achieved through either deepening or laterally extending existing magnesian limestone sites where basal permian sand lies at accessible depths, or beneath the existing quarry void at accessible depths.
- The Plan should allow for sufficient flexibility to enable extensions to existing sites, where this is consistent with wider site operational requirements.
- Need to take into account potential limitations on extraction from the floor such as the depth of the water table in the locality and the associated impact of working.
- Favour lateral extensions to basal permian sand quarries because such an approach has the potential to both avoid the hydro-geological implications of working at depth and allow early or progressive restoration of the existing workings to proceed.
- Have a preference for the working of fluvial or glacial sand and gravels, but would not recommend any new allocations and extensions in the permian sands.
- The viability of river gravel/sand extraction should consider the added benefits of flood alleviation control – extension of flood plain and management thereof that could be included in the operation and restoration proposals.
- Concern at the risk that options a or b could lead to harm to protected sites.
- Concern about sand and gravel sites in the Gainford area / lower Tees area. The plan should contain protection for these areas.

**Responses to main issues**

- The Plan recognises the significant contribution of sand and gravel extracted in County Durham to the North East Region. The approach adopted seeks to ensure that a steady and adequate supply can be maintained and that landbanks can be maintained throughout the plan period whilst avoiding environmentally important areas.
- The Plan together with the Minerals and Waste Policies and Allocations document will ensure that certainty is given to the minerals industry and local communities as to where mineral working will be guided to and where it will occur in the future.
- Groundwater is a key issue which will be considered in allocation and permitting new mineral working on the East Durham Limestone Plateau which is a recognised major aquifer.
- The County Durham Plan and Minerals and Waste Policies and Allocations document will contain policies which will allow impacts on surface, ground and coastal waters to be considered.

**Question 43 - If the Plan allocated sites for longer term working should we consider:**

- a. Proposals to deepen existing magnesian limestone sites where basal permian sand lies beneath the existing quarry void at accessible depths;
- b. Proposals to laterally extend existing magnesian limestone sites where basal permian sand lies at accessible depths;
- c. New sand and gravel sites, working fluvial or glacial sand and gravels wherever the resource occurs;
- d. New sand and gravel working fluvial or glacial sand and gravels in locations outside of environmentally important areas and in locations in close proximity to markets e.g. Central Durham and the Tyne and Wear and Tees Valley conurbations; or
- e. Disagree, there is no need to allocate new sites.

- The council has systematically assessed all operator proposed allocations. In doing so it has considered the forecast need for sand and gravel over the Plan period and the extent and adequacy of the existing supply.
- The Plan safeguards all fluvial, glacial and basal permian sands found in County Durham.

**Question 44 - Natural Building and Roofing Stone**

**Question 44 - Which option do you prefer for the location of new natural building and roofing stone workings?**

- a. Only outside of the North Pennines AONB and in areas not subject to international or national biodiversity designations;
- b. Locate the majority of new working to areas outside the North Pennines AONB and international or national biodiversity designations but allow some small scale working in certain circumstances within the AONB; or
- c. Do not provide any locational guidance.

Number of Representations in policy area

20

**Summary of main issues raised by representations**

- Half of the respondents that expressed a preference chose option a.
- Half of the respondents that expressed a preference chose option b.
- Just over 5% of respondents who expressed a preference chose option c.
- It will be important to ensure there is a steady and adequate supply of this resource from County Durham to meet local and wider needs.
- A prediction of demand for traditional roofing stone and natural building stone would be a sensible step, as would assessing whether demand might be met from adjacent authority sites.

**Question 44 - Which option do you prefer for the location of new natural building and roofing stone workings?**

**a. Only outside of the North Pennines AONB and in areas not subject to international or national biodiversity designations;**

**b. Locate the majority of new working to areas outside the North Pennines AONB and international or national biodiversity designations but allow some small scale working in certain circumstances within the AONB; or**

**c. Do not provide any locational guidance.**

- Sites within the AONB should only be considered where there is no biodiversity or landscape quality loss (including tranquillity).
- Greater definition of 'small scale working in certain circumstances within the AONB', would be beneficial.
- It is important that the LPA plans positively to meet any demand for small-scale extraction of building stone at, or close to, relic quarries as these are needed in particular for the repair of heritage assets.
- There is no reason why continued mineral extraction should jeopardise the unique character of the North Pennines provided it is carefully managed to reconcile any conflicting interests.
- Small-scale quarrying is an established feature of the Dales landscape. The development or replacement of existing sites should be considered on a case-by-case basis, using an analysis of the environmental impact of the proposed development and with suitable mitigation in terms of screening and (ultimate) reinstatement.

**Responses to main issues**

- The council seek to plan positively to provide a steady and adequate supply of natural and building roofing stone.
- The council has sought to understand the demand for traditional roofing stone and natural building stone. Unfortunately, recent nationally collected information on sales of natural building and roofing stone is not available and the majority of County Durham's remaining natural building and roofing stone companies have not provided information when approached.
- Whether working is small scale or not or 'major development' will be a matter for the decision maker. The council does not consider that all mineral working within the AONB should be considered as 'major development'. The council notes the reference in the North Pennines AONB Planning Guidelines which refers to non-major development and how they need to be carefully assessed and considers that there is merit in this approach.

**Question 45 - Energy Minerals including Surface Mined Coal, Fireclay and Conventional Oil and Gas****Question 45 - Do you agree with the approach to Energy Minerals including Surface Mined Coal, Fireclay and Conventional Oil and Gas?**

Number of Representations in policy area	21
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**Summary of main issues raised by representations**

- Agree with the approach proposed which recognises the current local circumstances.
- Sites are few and far between and would need specialist consideration if proposed.
- Given the Government's intention to phase out coal burning power stations by 2025, as well as the desire to significantly de-carbonise the overall economy would question the need to consider new coal workings.
- Concern over the proposal to include policies on energy minerals within the County Durham Plan. In particular the council's stated intention to continue exploitation of surface mined coal, and fracked oil and gas is contradictory to this UK Government's climate change objectives. The approach also contradicts the Council's own core principles in relation to meeting the challenge of Climate Change.
- Oppose the fracking of shale gas.

**Responses to main issues**

- It is necessary for the council to prepare policies relating to surface mined coal in the Plan and policies on oil and gas within the Minerals and Waste Policies and Allocations document in order to accord with the Government policy on the provision of minerals as outlined in the National Planning Policy Framework (NPPF) and Planning Practice Guide. Without such policies it is likely that these documents will either not be found sound or once adopted they will not provide a suitable basis for the determination of coal or oil and gas related planning applications. Preparation of such policies through the local plan process provides an opportunity for strong policies to be put into place to protect and enhance the environment and amenity of local communities whilst also ensuring acceptable schemes of working or exploration and production are permitted.

**Question 46 - Call for Sites****Question 46 - Are there any sites that should be considered for allocation for mineral extraction?**

Number of Representations in policy area	23
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**Summary of main issues raised by representations**

- Wish to continue to promote Thrislington Quarry as an allocation for mineral extraction in accordance with its extant planning permissions covering both the eastern and western areas of the A1(M) for both magnesian limestone (including high grade dolomite) and permian basal sands.
- Wish to promote the whole of the Thrislington West sand area as an opportunity to meet a significant proportion of its sand allocation from an existing operational site through either lateral extension and/or deepening at the extant quarry void.

#### Question 46 - Are there any sites that should be considered for allocation for mineral extraction?

- Submit the Todhills south site. The operation at Long Lane quarry does not give us the 25 years of mineral we require.
- Promote an extension to Kilmond Wood Quarry.
- Promote an eastern extension to Hulands Quarry and a western and eastern extension to Heights Quarry.
- Promote a site at Low Harperly near Wolsingham, an extension to Crime Rigg Quarry, extension to Witch Hill Quarry, the reworking of Washpool Craggs on Bolihope Common and the use of Broadwood Quarry as a mineral processing hub.

#### Responses to main issues

- The mineral sites which have been proposed are considered in the Technical Consultation Report, New Minerals and Waste Sites in County Durham.

### Waste Resource Management

#### Question 47 - Provision for Waste

#### Question 47 - In making provision for waste we produce should we:

- Make provision for all of County Durham's waste (net self sufficiency);
- Make provision for all County Durham's waste and as much as possible from elsewhere, in order to maximise economic and employment opportunities in waste management; or
- Make provision for less waste than arises in County Durham, on the basis that a significant proportion will be managed outside the County.
- Please give reasons for your response.

Number of Representations in policy area	33
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#### Summary of main issues raised by representations

- The majority of respondents supported net self-sufficiency (option a).
- The approach encourages new waste management infrastructure in locations as near as practicable to existing sources and expected patterns of growth, reducing the distance between the beginning and end users which serves to minimise the overall distance of travel and help to reduce the amount of traffic associated with waste developments utilising the Strategic Road Network.
- There should be at least a provision for all of the county's waste, but there should also be a greater focus on an increase in the reuse or recycling of waste.

**Question 47 - In making provision for waste we produce should we:**

- a. Make provision for all of County Durham's waste (net self sufficiency);**
- b. Make provision for all County Durham's waste and as much as possible from elsewhere, in order to maximise economic and employment opportunities in waste management; or**
- c. Make provision for less waste than arises in County Durham, on the basis that a significant proportion will be managed outside the County.**
- d. Please give reasons for your response.**

- The unnecessary transport of and the 'import' to the county of, hazardous waste can only create serious problems for the future.
- It was considered that the aim should be to plan for net self-sufficiency. Should also recognise that the most sustainable option available can sometimes be to use facilities elsewhere and that this can also mean that wastes are imported into County Durham.
- The option a approach is in line with NPPF.
- The county is probably sufficient for the facilities available to deal with, taking in other waste from elsewhere should not be encouraged, as it is difficult to assess long-term environmental damage, and that cannot be offset against economic/ employment benefits.
- Provision should be made for at least all of County Durham's waste as it may not be sustainable to guarantee capacity outside of the county. However, it may only be economically viable for a waste management company to provide capacity greater than that offered by the county and so would need to take in waste from elsewhere.
- Option b would result significant economic and employment opportunities or becoming a leader in this area.
- Whilst there are economic and employment opportunities in waste management we do not want to become a dumping ground for the North East. Innovative environmentally friendly facilities such as anaerobic digesters that have little impact on areas should however be encouraged.
- Those who chose option c cited less environmental harm and suggested sharing facilities with other areas.
- All options should be subject to acceptable mitigation measures to protect human health and controlled waters.
- Support was given to the opportunities for the creation of energy and other by-products, to provide both energy security and employment opportunities.
- Whilst the provision of facilities for all or some types of waste within the county will be appropriate, eg perhaps household waste, others will require a wider view. Specialised waste in particular, eg hazardous wastes of various types, may well be better disposed of at a regional, or even national, level.
- Further waste development should be approved on a county-wide basis and in localities which cause the least disruption to local communities.

**Question 47 - In making provision for waste we produce should we:**

- a. Make provision for all of County Durham's waste (net self sufficiency);
- b. Make provision for all County Durham's waste and as much as possible from elsewhere, in order to maximise economic and employment opportunities in waste management; or
- c. Make provision for less waste than arises in County Durham, on the basis that a significant proportion will be managed outside the County.
- d. Please give reasons for your response.

- Waste facilities should be safeguarded.

**Responses to main issues**

- The Plan's approach is to provide for all of County Durham's waste, whilst taking into account the flows of waste which already exist with other areas. This is true net self-sufficiency. The policy includes flexibility to allow appropriate development to come forward without over-provision and takes into account the current arrangements with the county's LACW (municipal) waste contract.
- The Plan approach through the Location of New Waste Facilities policy is in line with national guidance, seeking where possible to use waste as a resource and co-locate facilities with complimentary activities and potential users of recovered materials, recyclates and soils, energy and heat. The Plan also advocates the use of the Waste Hierarchy.
- The waste policies in the Plan contain criteria to safeguard the environment and communities from unacceptable adverse impacts. The Plan also contains a policy on Amenity and Pollution.
- The Plan approach to Hazardous waste is to make provision through the criteria-based Waste Management Provision policy. This would be used in conjunction with the saved policy in the Waste Local Plan until this is replaced by a policy on Hazardous Wastes in the Minerals and Waste Policies and Allocations DPD.
- The Location of Waste Management Facilities policy seeks to minimise the effects of transporting waste including by locating as close to the arisings as possible. The Minerals and Waste Policies and Allocations Document will complement the Plan and set out a detailed development management policy for traffic and transport.
- The Plan contains a policy on safeguarding facilities.

**Question 48 - Inert Wastes**

**Question 48 - Do you agree that arisings of inert waste are likely to remain at 2008 levels (1,066,097 tonnes) for the entire Plan period? Please give reasons for your response.**

Number of Representations in policy area	16
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**Summary of main issues raised by representations**

**Question 48 - Do you agree that arisings of inert waste are likely to remain at 2008 levels (1,066,097 tonnes) for the entire Plan period? Please give reasons for your response.**

- Whilst a number of respondents took the view that the data showed that this was a sound approach, some questioned why levels would remain the same.
- If significant regeneration is to happen over the period of the plan, then it is likely that the total waste figure will increase on 2008 levels.
- Do not know what the level of inert waste arising will be in the future and it is likely to be difficult to predict. There is merit in a policy which can be reviewed at an appropriate timescale.
- It is difficult to identify the quantities of construction, demolition and excavation waste produced by the construction industry. The quantities fluctuate depending on market conditions and the economy. Is it therefore appropriate to rely on the estimates of such waste produced in 2008 at the beginning of the recession.
- Central government is pushing the 'Northern Powerhouse' and Sunderland/ South Tyneside are in the process of planning for the International Advanced Manufacturing Park and this will inevitably result in additional construction activities in the region and potentially more CD&E waste. Therefore this type of waste will increase and should be acknowledged in the Plan.
- The element of CD&E waste that cannot be recycled can be used to restore derelict and contaminated land. The council needs to incorporate a policy that acknowledges this and views this waste stream as a resource that can be used for the restoration of derelict land.
- It is not acceptable for inert waste to remain at 2008 levels. The council should be developing a strategy to increase reuse and recycling of different products and ensure that landfill and incinerated waste quantities are significantly reduced.
- Further waste development should be approved on a County-wide basis and in localities which cause the least disruption to local communities.

**Responses to main issues**

- The original approach to inert and construction, demolition and excavation waste (CDEW) was to use the 2008 (proxy) arisings figure from the Environment Agency as it was a 'worst case', being before the recession. The levels of arisings were high and flat growth was projected across the Plan period in line with the advice in National Planning Practice Guidance (PPG) (Paragraph 033 Reference ID: 28-033-20141016). This is on the basis of limited data.
- The Plan approach to construction, demolition and excavation waste (including inert waste) is in line with the advice in PPG, planning for net arisings to remain constant over time as data on which forward projections can be based is limited. The projections are no longer based on 2008 levels, however. New projections are set out in the waste evidence base, including the 2018 Addendum.
- The policy will be monitored through the Annual Monitoring Report and the indicators proposed in the Preferred Options. The policy will be reviewed as necessary.

**Question 48 - Do you agree that arisings of inert waste are likely to remain at 2008 levels (1,066,097 tonnes) for the entire Plan period? Please give reasons for your response.**

- The council is developing a strategy to increase reuse and recycling and reduce landfilling and this forms part of the waste policies in the Plan. This includes the Sustainable Minerals and Waste Resource Management policy.
- The Plan aims to protect the amenity of local communities. The Waste Management Provision policy contains criteria against excessive provision and on protection of the environment. The Location of New Waste Facilities policy also contains safeguards.

**Question 49 - Hazardous and Low Level Radioactive Waste**

**Question 49 - Given the capacity elsewhere, do you agree that there is no need to identify any allocations for hazardous or low level radioactive waste capacity? Please give reasons for your response.**

Number of Representations in policy area

18

**Summary of main issues raised by representations**

- The majority of respondents agreed with the approach.
- The production of hazardous or low level radioactive waste should be discouraged and alternatives supported and encouraged.
- If there is only capacity identified in other local authority areas until 2029, an appropriate site may need to be identified otherwise the council are reliant on other areas increasing their capacity. Developing a hazardous / low level radioactive waste facility can take many years and is not something that can be done at the last minute.
- If the authority has identified enough suitable sites for hazardous or low level waste which will remain available in other authority areas it may not require allocations within the county. However, this will require close coordination with other authorities and be capable of review at an appropriate timescale as unforeseeable circumstances could arise. It is anticipated this will receive major consideration when the Minerals and Waste Strategy is compiled.
- Agree that that there is no need to identify any allocations for hazardous or low level radioactive waste capacity because of the small arisings of both waste streams; it would not be economically viable to provide facilities that are, ultimately, market-led.
- Suggested that the emerging policy includes a degree of flexibility to support proposals that may come forward over the plan period that would help drive waste management up the waste hierarchy and are environmentally acceptable.
- Agree that there is no need to identify any allocations for hazardous or low level radioactive waste capacity. It will be costly and difficult to identify a new allocation.

**Responses to main issues**

- The Plan approach uses the Waste Hierarchy which favours prevention of waste in the first instance.

**Question 49 - Given the capacity elsewhere, do you agree that there is no need to identify any allocations for hazardous or low level radioactive waste capacity? Please give reasons for your response.**

- It is our intention to prepare a policy on hazardous or low level radioactive waste (LLRW) in the Minerals and Waste Policies and Allocations Document. The policies in the Plan include sufficient flexibility to allow for capacity to come forward. This would include hazardous waste capacity. The Plan approach is therefore not to identify any capacity by allocations for LLRW or hazardous waste. This is supported by the evidence.
- The Minerals and Waste Policies and Allocations DPD will contain a policy on LLRW, including Naturally Occurring Radioactive Materials (NORM) from fracking. It will also contain a policy on Hazardous Waste proposals. In the meantime, the policy in the Waste Local Plan together with the Location of New Waste Facilities and the Waste Management Provision policy will provide the flexibility to determine applications for this type of development.
- The policy approach in the Preferred Options aims to protect the amenity of local communities. The Waste Management Provision policy contains criteria against excessive provision and on protection of the environment. The Location of New Waste Facilities policy also contains safeguards.

#### Question 50 - Call for Sites

**Question 50 - Should evidence show they are required, are there any sites that should be considered for allocation for waste management (related to the need outlined above)? Please refer to the Call for Sites document for detail on what information is required.**

Number of Representations in policy area	12
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#### Summary of main issues raised by representations

- Most comments related to not being aware of any suitable sites to put forward.
- Would not wish to see a proliferation of any brickworks in Eldon, but feel that any further waste development should be approved on a county-wide basis and in localities which cause the least disruption to local communities.

#### Responses to main issues

- The policy approach in the Plan aims to protect the amenity of local communities. The Waste Management Provision policy contains criteria against excessive provision and on protection of the environment. The Location of New Waste Facilities policy also contains safeguards.
- All new non-strategic waste sites will be considered through work to prepare the Minerals and Waste Policies and Allocations document and will need to conform to the spatial and quantitative approach set out within the Plan.

<b>Any Other Comments</b>	
<b>Number of Representations</b>	<b>741</b>
<b>Summary of main issues raised by representations</b>	
<ul style="list-style-type: none"> <li>• Infrastructure needs to be in place to support increased housing including schools, roads, health care, shops, community facilities, leisure centres and green spaces within settlements across the county.</li> <li>• The provision of a variety of community infrastructure and cultural facilities are vital for their contribution to residents and visitors health, well-being and life satisfaction and this should be promoted in this plan.</li> <li>• Community Infrastructure Levy is problematic in securing infrastructure.</li> <li>• There is a concern that Ferryhill has lost its status as a town.</li> <li>• Food Durham request that consideration is given to the benefits of providing sufficient land for growing food.</li> <li>• Support for the introduction of a low carbon and renewable energy policy but there should also be a recognition that not all sites will be suitable for example when impacting on the historic environment.</li> <li>• The village of Coxhoe has sufficient permissions for new housing.</li> <li>• A detailed submission has been submitted regarding the proposed approach to viability.</li> <li>• An expression on the need to stimulate and support a prosperous rural economy including economic sectors.</li> <li>• Rural areas are disadvantaged which adds to the importance for Super-Fast Broadband to support small businesses, schools and subsequently jobs.</li> <li>• The county's town centres require investment, with some centres having suffered owing to out of town retail developments.</li> <li>• Support, encouragement and incentives should be provided to people wishing to self-build.</li> </ul>	
<b>Responses to main issues</b>	
<ul style="list-style-type: none"> <li>• Requirements to improve infrastructure such as schools, roads, water treatment, leisure and community facilities to support the delivery of housing is included within the Infrastructure Delivery Plan which informs the County Durham Plan.</li> <li>• At the current time, there is no proposal to pursue the introduction of a Community Infrastructure Levy and developer contributions will continue to be secured through Section 106 legal agreements and planning conditions.</li> <li>• The Settlement Study has considered the accessibility of services and facilities within all the settlements across County Durham and does not differentiate between towns or villages.</li> </ul>	

<b>Any Other Comments</b>	
<b>Number of Representations</b>	<b>741</b>
<b>Summary of main issues raised by representations</b>	
<ul style="list-style-type: none"> <li>• A policy is included within the Plan which seeks to resist development on high quality agricultural land.</li> <li>• The Plan includes a chapter entitled 'meeting the challenge of climate change, flooding and coastal change.'</li> <li>• There are no housing allocations identified for Coxhoe to acknowledge that there are planning permissions existing within Coxhoe.</li> <li>• Comments received to the proposed approach to viability have been considered as part of the preparation on the Local Plan. Government has prepared guidance on assumptions to be used for the purposes of local plan viability testing.</li> <li>• The County Durham Plan includes a chapter and relevant policies aimed at supporting a prosperous rural economy.</li> <li>• The council is working in partnership with the UK Government to help improve broadband speeds for residents and businesses through several initiatives. The importance of Next Generation Access capable of delivering speeds of 24Mbps or greater is recognised, and the council is committed to extending fibre coverage to as many businesses, homes and communities in County Durham as possible with the funding available.</li> <li>• The Retail and Town Centre Study does not identify a retail need within any of the town centres, the Plan's policy approach is to support appropriate development in all of our town centres that will improve the vitality and viability of them.</li> <li>• The Type and Mix policy within the plan seeks to support proposals for self and custom build housing.</li> </ul>	

**11** The following section provides a summary of comments made by the Duty to Cooperate Bodies. It should be noted that not all Duty to Cooperate Bodies responded, this section only covers the bodies who replied to the consultation and these were:

- North Yorkshire County Council
- Cumbria County Council
- Northumberland County Council
- Stockton Borough Council
- Darlington Borough Council
- Gateshead Borough Council
- Hartlepool Borough Council
- Environment Agency
- Historic England
- Natural England
- Highways England

#### North Yorkshire County Council

#### North Yorkshire County Council

Summary of Comments made
<ul style="list-style-type: none"> <li>• North Yorkshire County Council have no substantive cross boundary minerals or waste issues that need addressing at this stage.</li> <li>• Identify that the impact of housing growth in West Durham and Barnard Castle on North Yorkshire Schools will be minimal and it is highly unlikely that we would be asking for any developer contributions towards school places.</li> </ul>
Council Response
<ul style="list-style-type: none"> <li>• The council will continue to engage with North Yorkshire throughout the plan making process in accordance with the duty to cooperate.</li> <li>• We agree with North Yorkshire County Council's assessment that the impact of housing growth will be minimal and note the County Council's view on developer contributions.</li> </ul>

#### Cumbria County Council

#### Cumbria County Council

Summary of Comments made
<ul style="list-style-type: none"> <li>• Cumbria County Council see no particular issues at present considering:             <ul style="list-style-type: none"> <li>• Aggregates Cross boundary sales of crushed rock and sand &amp; gravel are low or non-existent, in both directions.</li> </ul> </li> </ul>

### Summary of Comments made

- Zinc mining Cumbria County Council has not heard of any further developments with the proposal to open up the old underground permissions across our shared boundary, near Nenthead.
- Unconventional hydrocarbons It was noted in our recent discussion that there are no PEDL or UCG licences on land in Durham at present. Cluff Natural Resources do have a conditional licence for UCG offshore, but to date there has been no pre-application discussions held with Durham. Now that Scotland has placed a moratorium on UCG, Cluff may move their focus from in and around the Firth of Forth.
- Agree that the Local Plan needs to address all areas of the water management including flood risk.
- Support the approach to identifying Mineral Safeguarding Areas.
- In making provision for waste. Cumbria County Council supports Option A. Make provision for all of County Durham's waste (net self sufficiency. This is the preferred Option because it is consistent with national policy.
- Agree that that there is no need to identify any allocations for hazardous or low level radioactive waste capacity because of the small arisings of both waste streams; it would not be economically viable to provide facilities that are, ultimately, market-led.
- Cumbria County Council supports this approach of adding a policy within the Minerals and Waste Allocation document that would help proposals associated with NORM arising from Fracking Activity

### Council Response

- The council agrees with Cumbria's assessment of the position in relation to the strategic cross boundary matters between and across our shared boundaries and will continue to engage with Cumbria throughout the plan making process in accordance with the duty to cooperate.
- The council welcomes Cumbria's support in relation to the approach taken to climate change and water management including flood risk.
- We welcome the support afforded to our approach to identifying Mineral Safeguarding Areas.
- Cumbria's preference for the council seeking to achieve net self sufficiency for waste is noted.
- Support for not identifying allocations for hazardous or low level radioactive waste arisings because of the small arisings for both waste streams noted.
- Support for the inclusion of a Policy for NORM arisings from fracking activities in the Minerals and Waste Policy and Allocations document noted.

### Northumberland County Council

### Northumberland County Council

### Summary of Comments made

- Northumberland supports the emerging spatial vision and strategic objectives.

### Summary of Comments made

- Durham's SHMA considers County Durham to be a relatively self-contained housing market area. Our own SHMA shows no evidence that would give any reason to disagree with this in relation to the boundary between our two Counties.
- Support an ambitious increase in the employment rate as being in alignment with Northumberland's approach.
- Agree that it would be appropriate to incorporate an allowance for small windfalls and agree with the position in relation to large windfall sites.
- Northumberland would agree that it is appropriate to focus on the most attractive economic areas.
- Northumberland would not wish to express a strong preference between any of the first three options (in terms of the spatial approach to new development). However would consider it doubtful that the fourth option (wider dispersal) would form a sustainable solution.
- Northumberland has used a lower retail impact threshold for new out-of-centre retail outlets. It is suggested that this may be applicable to all or parts of County Durham, although it is not considered that the thresholds used by our two authorities necessarily need to be aligned.
- Northumberland looks forward to continuing to work with DCC, as necessary, on Gypsy and Traveller accommodation issues as part of the Duty to Co-operate requirements.
- In terms of new areas of Green Belt, specifically an extension of the Tyne and Wear Green Belt that would link with the current Green Belt in the Tyne Valley in Northumberland, the Council would wish to continue to work with Durham County Council on this issue as part of the Duty to Co-operate requirements.
- In terms of wind turbine development, any work to identify such areas will need to ensure any cross boundary issues with Northumberland have been considered and where relevant dealt with. This is a matter that can be considered as part of ongoing discussions between the two authorities on this subject.
- Would wish to continue to work with Durham County Council on the formulation of more detailed policies in relation to the AONB as part of the Duty to Co-operate requirements.
- The emerging policy approach to magnesian limestone needs to include a degree of flexibility to support proposals that would help to maintain a steady and adequate supply to meet both local and wider needs. In terms of the approach to carboniferous limestone an important consideration for the County Durham Plan will be whether an appropriate supply and landbank can be maintained outside of the AONB. If this option b is taken forward it is important that there is a clear policy position on the circumstances where development in the North Pennines AONB would be supported. In terms of igneous rock supply it is considered that a policy on this could set out circumstances where proposals for extraction of this mineral for aggregate use will be supported. Sand and gravel from quarries in County Durham make a significant contribution to the supply of this material to County Durham and the wider region. The proposed approach should recognise this and include a degree of flexibility to ensure a steady and adequate supply and an appropriate landbank is maintained. It is considered that there are no significant cross

### Summary of Comments made

boundary issues in relation to natural building and roofing stone that require detailed discussions between the two authorities at this stage. There is broad agreement with the approach proposed to energy minerals.

- The approach to waste should recognise that the most sustainable option available can sometimes be to use facilities elsewhere and that this can also mean that wastes are imported into County Durham for management. In terms of low level radioactive waste, there is broad agreement with the approach proposed.

### Council Response

- Support for spatial vision and strategic objectives noted.
- The Preferred Options Strategic Housing Market Assessment (SHMA) 2016 has confirmed that County Durham is a Housing Market Area and is an appropriate geography for assessing housing needs.
- A small windfall allowance based upon the appropriate evidence has been included within the Preferred Options Document. The council considers that there should be no windfall allowance for sites over 0.4ha in the context of plan making.
- The emerging evidence with the Employment Land Review identifies the key economic areas in the County.
- Comments noted regarding the options and in particular relating to the Wider Dispersal option.
- Northumberland's view on retail thresholds is welcomed.
- Comments noted in relation to Gypsy and Traveller site assessments.
- The Green Belt Assessment concludes that a proposed extension of the Green Belt in north west Durham would not perform any additional role to the designation which is already within Gateshead and Northumberland and would not achieve the objectives of Purpose 1 (to check the unrestricted sprawl of large built-up areas). Based on the current interpretation of "major change of circumstances" and the review of current development pressures, there is currently no demonstration as to why normal planning and development management policies would not be adequate to deliver positive, planned and aspiration growth.
- The Preferred Options contains a criteria-based policy which is informed by the approach in the council's Wind Turbine Evidence Paper. Cross boundary issues have been recognised and addressed as part of the assessment, and discussion will continue to ensure consistency of approach.
- There will be specific policies within the plan to ensure the protection and enhancement of the natural and historic environment.
- The council will seek to work collaboratively on the strategic planning issues associated with minerals. Through the policies of the County Durham Plan and taking into account the latest Joint Local Aggregate Assessment (2018) the council will seek to ensure that a steady and adequate supply of aggregates is maintained. In terms of magnesian limestone the Preferred Options seeks to include some flexibility by being permissive to allow extensions of time to allow

### Summary of Comments made

working to continue where an existing operational site contains reserves which would not be extracted by the permission end date. In terms of carboniferous limestone the council's preferred policy approach has aligned with the National Planning Policy framework approach taking into account Government policy for AONBs. In terms of dolerite the preferred policy will allow proposals for further working to be determined, in this regard the plan needs to be read as a whole and other policies will also be material to the determination of any planning application including the policy which relates to Internationally Designated Sites. The emerging preferred policy approach sets out the council's approach to maintaining a steady and adequate supply of sand and gravel.

- Agreement with the approach to natural building and roofing stone and energy minerals noted.
- In terms of waste the preferred approach recognises that the most sustainable option available can sometimes be to use facilities elsewhere and that this can also mean that wastes are imported into County Durham for management. Support to the approach to low level radioactive waste noted.
- Durham County Council will continue to engage with Northumberland throughout the plan making process in accordance with the duty to cooperate.

### Stockton Borough Council

#### Stockton Borough Council

### Summary of Comments made

- Stockton Borough Council do not have any formal comments to make on the Local Plan.

### Council Response

- The council will continue to engage with Stockton Borough Council throughout the plan making process in accordance with the duty to cooperate.

### Darlington Borough Council

#### Darlington Borough Council

### Summary of Comments made

- Darlington Borough Council raise issues with regards to the council methodology relating demographic analysis and forecasting outlined within the document. These relate to cross boundary migration issues and commuting ratios with Darlington.
- Highlight the need to work with the Highways Agency in relation to potential congestion on the A1(M).

### Council Response

### Summary of Comments made

- The Preferred Options is based on the Government's methodology for calculating housing needs. Therefore the methodologies queried will not now be referred to.
- The council will continue to engage with Darlington Borough Council and the Highways Agency in relation to capacity on the A1(M) in accordance with the duty to cooperate

### Gateshead Borough Council

### Gateshead Borough Council

#### Comments made

- Gateshead Borough Council highlight the need to consider cross boundary traffic flows when considering options for housing distribution, specifically highlighting that Tyne and Wear provides a considerable draw in terms of employment, leisure and retail facilities.
- Support the extension of the Green Belt in County Durham to form a continuation of Tyne and Wear Green Belt and highlight the exceptional circumstances for this designation based on sustainable patterns of development and reducing opportunities for further commuting.
- Welcomes the opportunity to work with Durham County Council as a Local Planning Authority and a Lead Local Flood Authority in making a positive contribution towards the catchment management of the River Team.
- Support the approach for longer term working of sand and gravel in County Durham. Will work collaboratively with Durham County Council as part of a regional approach to these issues.

#### Council Response

- The council will continue to engage with Gateshead Borough Council with regards to traffic flows between County Durham and Gateshead. This issue has been given consideration when identifying our a preferred distribution for housing.
- The Green Belt Assessment concludes that a proposed extension of the Green Belt in north west Durham would not perform any additional role to the designation which is already within Gateshead and Northumberland and would not achieve the objectives of Purpose 1 (to check the unrestricted sprawl of large built-up areas). Based on the current interpretation of "major change of circumstances" and the review of current development pressures, there is currently no demonstration as to why normal planning and development management policies would not be adequate to deliver positive, planned and aspiration growth.
- The council will continue to work with Gateshead Borough Council on the catchment management of the River Team in accordance with the duty to cooperate.
- Support for the working of sand and gravel noted.

## Hartlepool Borough Council

### Hartlepool Borough Council

#### Summary of Comments made

- Hartlepool Borough Council highlight a number of strategic cross-boundary issues for the County Council to consider at the next stage of the Plan process in relation to housing, employment, shopping, education.

#### Council Response

- The council will continue to engage with Hartlepool Borough Council throughout the plan making process in accordance with the duty to cooperate.

## Environment Agency

### Environment Agency

#### Comments made

- The Environment Agency generally supported the Plan Objectives but would welcome more emphasis on the environment, climate change and water management. They requested an amendment to Objective 14 (Adaptation to climate change.)
- They supported the inclusion of SuDS and other surface water mitigation techniques.
- They highlighted that water is a valuable resource and an increasing population means greater pressures for its use and also the potential pollution risk. This use included the protection of groundwater, drinking Water Protection Areas and aquifers (particularly with rising mine water levels) as well as the contribution of rivers to the County's economic resource supporting tourism, supporting European protected sites and renewable energy. It is vital that the water environment is properly managed and that the Local Plan and SA has regard to the objectives of the Water Framework Directive (WFD) and the Northumbria River Basin Management Plan (RBMP).
- Specific concerns were raised regarding the protection of groundwater resources in relation to minerals and waste developments, however the EA were pleased to note the council's intent to produce a Mineral and Waste Policies and Allocations Document.
- Facilitating the sustainable use of minerals:
  - Magnesium limestone - The EA agreed that no further sites are required as there are multiple sites already operational and a number of risks associated with new workings and restoration of sites.
  - Carboniferous Limestone - The EA had no preference for locations inside or outside the AONB, but would probably prefer new applications rather than extensions which (if vertical) could take operations below the water table.
  - Dolerite - The EA agreed that no further workings were justified as sufficient reserves are permitted.

### Comments made

- Sand and gravel - The EA expressed a preference towards options c and d depending on the proposed location of any new sites but had particular concerns with option a, which would pose the greatest risk to groundwater in the area.
- Natural Building and Roofing Stone - The EA had no preference for locations inside or outside the AONB, but would probably prefer new applications rather than extensions which (if vertical) could take operations below the water table.
- The EA raised no concerns with the council's proposed approach to energy minerals including surface mined coal, fireclay and conventional oil and gas.
- In making provision for waste the EA highlighted that all options should be subject to acceptable mitigation measures to protect human health and controlled waters. Provision should be made for at least all of County Durham's Waste and concern was raised the total waste figure will increase on 2008 figures.
- The EA identified that there might be a need to identify a site for a hazardous/low level radioactive waste facility however they agreed that there was no need to identify any allocations as this stage.

### Council Response

- The objective has been amended to add reference to an integrated approach to water management.
- There is a suite of policies within the Plan which look to protect, manage and improve the water environment, Heritage Coast and the natural environment. These policies are underpinned by the Water Cycle Study and Strategic Flood Risk Assessment which have been drawn up in partnership with the Environment Agency (EA). The policy recognises that it is important to consider the protection of water resources from pollution particularly when assessing any development that has the potential to adversely affect water quality either above or below ground, including rising mine water levels. The policy also recognises that Sustainable Drainage Systems and green infrastructure can also prevent pollution by filtration of surface water runoff thereby contributing to improvements in the quality of watercourses in line with legislation.
- The council welcomes the Environment Agency's support for the preparation of a Mineral and Waste Policies and Allocation document.
- All of the waste policies in the Preferred Options contain criteria to safeguard the environment and communities from unacceptable adverse impacts. The Preferred Option approach is to provide for all of County Durham's waste. Evidence suggests that inert waste arisings are actually falling and therefore planning for flat growth on 2008 levels is considered a sound approach. We will continue to work with the EA to ensure the policies within the Plan cover all pertinent issues.
- It is the council's intention to prepare a policy on Low Level Radioactive Waste (LLRW) in the Minerals and Waste Policies and Allocations Document. The Preferred Options approach is therefore not to identify any capacity by allocations for LLRW or hazardous waste. We will continue to work with the EA to ensure the policies within the Plan and the Minerals and Waste Policies and Allocations Document cover all pertinent issues.

## Historic England

### Historic England

Comments made
<ul style="list-style-type: none"> <li>• Historic England emphasise the need to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. They welcome and support the positive approach to conserving and enhancing the natural and historic environment set down in the Plan.</li> <li>• While Historic England do not have the capacity to review the SA in detail, they agree with the conclusions, in particular in relation to the historic environment.</li> <li>• They support the Objectives (many of which support the historic environment) and welcome where that has been specifically referenced. While they welcome the recognition within the Spatial Vision of the importance of the historic environment, the vision could perhaps be enhanced by a profile which sets out what makes the county unique, and how that will be enhanced.</li> <li>• Historic England consider that it is difficult to comment upon the likely impact of the different population growth scenarios on the historic environment. However, they note from the accompanying Sustainability Appraisal that the Long Term option is assessed as likely to have greater negative impacts upon local character and historic interest.</li> <li>• In pursuing a growth option, they suggest that the local planning authority should ensure that it has sufficient information and evidence to demonstrate that the public benefits would outweigh any harm or loss to the significance of heritage assets, including any contribution made by their setting, and that the benefit cannot be met by any other means in any other location.</li> <li>• Historic England support the intention to reduce reliance upon car-based travel (due to its many impacts upon the historic environment).</li> <li>• They support measures to exploit renewable energy sources, providing impacts (including the potential to cause serious damage to irreplaceable historic sites, which are themselves an integral part of the wider environmental and sustainability agenda) are properly managed.</li> <li>• The Plan should be supported by a sound understanding of the character and importance of the historic assets involved, whether at the scale of individual buildings and sites or more extensive historic areas and landscapes. Historic England provide a range of documents and support for councils.</li> </ul>
Council Response
<ul style="list-style-type: none"> <li>• The County Durham Plan is underpinned by a detailed evidence base which supports the growth strategy and approach to considering development which may impact upon the historic environment and its setting. For example, the Green Belt Assessment scopes the potential for reviewing the boundary around Durham City. The potential impacts on the city centre, and local receptors, has been assessed to ensure that they can be mitigated. The Durham City Sustainable Transport Delivery Plan seeks to mitigate the impacts of transport patterns and usage across the City. This strategy includes measures to influence a shift to more sustainable modes, which</li> </ul>

### Comments made

will assist efforts to maintain and enhance the historic environment. Major infrastructure proposals will be assessed through Environmental Impact Assessments to ensure that any impacts are appropriately managed.

- The Plan includes a positive strategy for the historic environment. This includes a commitment to maintaining an up-to-date evidence base on the county's assets and strategies for enhancement. This includes the preparation of conservation area appraisals and management plans, supporting the management plans for the WHS and the preparation of a range of materials including an assessment of the historic parks and gardens of the county.
- The Plan must balance a range of interests including the requirement for new houses and jobs, and for supporting sustainable technologies for example renewable energy projects. The strategy and policies set down in the Plan will ensure that the protection and enhancement of historic assets are appropriately considered.

### Natural England

### Natural England

### Comments made

- Natural England (NE) provided general support for the spatial vision, the objectives, the approach to windfall sites, water management and wind turbines, the housing calculation methodology and the approach to spatial strategy of the Plan. This was with the caveat that any sites allocated in the plan will require assessment under the Habitats Regulations where their location has the potential to have a likely significant effect upon a European Designated Site as well as addressing wider landscape and environmental impacts.
- NE requested that the word 'maintain' be added into the objective looking to "protect, enhance and manage the County's locally, nationally and internationally important natural environment".
- As NE does not hold or own land for the purposes of development they did not put forward, or comment on, sites for a specific use such as retail, housing or mineral extraction.
- With regard to the green belt they were not aware of any areas within County Durham where a new green belt designation would be justified and did not feel they should comment on whether the existing green belt boundaries actually achieved the purpose of the green belt.
- In relation to exception sites and mineral sites they highlighted that landscape and environmental issues should be taken into consideration when determining the location of these sites.
- NE raised concern that the route of the Northern Relief Road crosses a section of Brasside Pond Site of Special Scientific Interest (SSSI) and that any impacts on the SSSI would need to be taken into consideration when assessing the viability of this option.
- NE raised concern that that the proposed strategy for conserving and enhancing the natural and historic environment was not clear.

### Council Response

### Comments made

- Sites allocated in the Plan have been subjected to a Habitat Regulations screening and assessment. Any subsequent sites coming forward would need to accord with the relevant policies in the Plan including the Habitat Regulation requirements picked up through the Nationally Designated Sites Policy as well as the landscape and environmental policies in the plan.
- 'Maintain' has been added to the relevant objective as requested.
- A full assessment of the Green Belt has been completed as part of the evidence base for the Preferred Option version of the Plan.
- Policies which support rural exception housing sites and mineral sites have been included in the Plan. The policies require that any such development must take into account environmental and landscape impacts. Any development will also need to accord with the generic landscape and environmental policies within the plan.
- Any design would seek to avoid any negative impacts on the SSSI in the first instance or provide appropriate mitigation in line with the relevant policies, if impacts were unavoidable.
- The Plan has a suite of of natural and historic environment policies which will provide more detail on how the council intend to balance the protection and enhancement of the natural and historic assets of the county with the requirement for new houses and jobs.

### Highways England

### Highways England

#### Summary of Comments made

- Highways England (HE) generally supported the Vision including the intention to seek to deliver an accessible, integrated and sustainable transport system, for all communities and businesses, which will result in an increase in public transport and other sustainable modes such as walking and cycling, which can help to facilitate a modal shift away from the private car.
- They support the Objectives , particularly in relation to infrastructure provision to support the delivery of the Plan aspirations. They raised no concerns with the inclusion of allowances for small windfall housing sites, empty homes, demolitions, rural exception sites, the allocation of specific use employment sites or the identification of major developed sites in the green belt.
- In relation to the preferred population growth scenario, HE were supportive of a requirement for 1,629 additional dwellings per year, as they felt this was a realistic and deliverable scenario.
- HE were also generally supportive of an approach which achieves net self-sufficiency in relation to waste management, as this should reduce the need for cross boundary movements of waste. Opportunities to transport waste through more sustainable means, such as rail or water based modes , would also be supported.
- HE highlighted that their main interest would be in the spatial distribution of development (including any new road proposals), which would be detailed in the Preferred Option stage of the plan, as this would provide a better understanding of the likely impact on the Strategic Road Network (SRN).

### Summary of Comments made

- In relation to the spatial distribution of development, HE raised concerns that infrastructure had been omitted as an important factor when considering the options for the Plan's spatial strategy, the ability of the SRN to operate efficiently and safely is critical and can be greatly influenced by the spatial distribution of development. HE generally preferred the Main Town Focus option, which promotes more focused and less dispersed development.
- HE identified additional work which they considered would be needed to be carried out as part of the evidence base to support the progression of the plan. This included the impact of the Plan on junctions 61, 62 and 63 and impacts to the SRN outside the county boundary, in order to identify any potential improvements which may be necessary to mitigate any severe impacts on the network.

### Council Response

- The council will continue to work with Highways England to ensure open dialogue and address any issues identified as the plan progresses.
- The impact of development on the Strategic Road Network was a key consideration when identifying allocations in the Plan. The council appreciates the constructive relationship that exists with Highways England and is committed to continued dialogue as the Plan progresses.
- High level analysis has been carried out as part of the evidence base for the Preferred Options. A more detailed modelling exercise will be completed for pre-submission draft.



**1.1** In accordance with best practice guidance, targeted consultation was undertaken in February 2018 on the council's emerging approach to identifying mineral safeguarding areas, safeguarding mineral handling, processing and transportation Infrastructure.. Those targeted included the minerals industry operating in County Durham and the north east, their trade organisations, adjoining mineral planning authorities and other non-adjoining mineral planning authorities where the council considers their are potential duty to cooperate issues in relation to the supply of industrial minerals. In total 21 questions were posed.

**1.2** Responses were received from:

- The Coal Authority;
- Cumbria County Council;
- Historic England;
- North Yorkshire County Council;
- Northumberland County Council; and
- Tarmac.

**Feedback on Identifying Mineral Safeguarding Areas & Safeguarding Mineral handling, Processing and Transportation Infrastructure in County Durham**

**Summary of Comments made**

- The Coal Authority agreed with the use of the information listed and the information sources identified; with the mineral resources identified which were proposed to be be safeguarded; the approach to safeguarding brickmaking raw materials; the approach to safeguarding surface coal resources and that the infrastructure related to minerals activity should be safeguarded.
- Cumbria County Council advised that they had no specific comments to make and noted that they had used similar data sources to identify the mineral safeguarding areas and that they safeguarded rail heads and rail sidings as infrastructure.
- Northumberland agreed with the listed sources of information used to define Minerals Safeguarding Areas; that the economically important minerals have been identified and that appropriate information sources have been used to identify them; agreed with the approach to safeguarding magnesian limestone, basal permian sands, carboniferous limestone, igneous rocks, brickmaking raw materials, moulding sand and surface mined coal; generally agreed with the approach to safeguarding sand and gravel but queried the approach to blown sand and raised beach deposits; generally agreed with the approach to building stone but queried the approach to relic sites; agreed with the approach to safeguarding rail facilities and alignments, concrete batching and other concrete products, and recycled products; queried the approach to the Port of Seaham; and agreed with the approach of identifying safeguarding areas around existing mineral sites to ensure that sensitive uses are not inadvertently located near to quarries.
- North Yorkshire County Council agreed with the approach proposed specifically: agreed with the sources of information proposed to used to define mineral safeguarding areas; the minerals proposed to be safeguarded; the approach to safeguarding magnesian limestone, sand and

### Summary of Comments made

gravel, basal permian sand, carboniferous limestone, igneous rocks, brick making raw materials, surface mined coal, natural building and roofing stone, moulding sand and vein minerals; the approach to be taken to sites and allocations; the approach taken to the compatibility with adjoining development noting the proposed buffer zones are the same as in the North Yorkshire emerging Joint Minerals and Waste Plan; the approach to safeguarding rail facilities and other infrastructure.

- Historic England queried the approach to safeguarding relic quarries.
- Tarmac's response agreed with proposed list of information to be used to safeguard minerals but also provided additional information about industrial limestone and basal permian sands in relation to the companies interests at Hawthorn Quarry, Thirslington Quarry and at other sites. Agreed with the range of economically important minerals identified. Tarmac's response supported the approach to safeguarding magnesian limestone and the approach proposed to High Grade Dolomite but suggested a wider area around the MSAs to provide an appropriate stand off from the resource. Supported the approach proposed to sand and gravel and basal permian sands. Disagreed with the statement in the report that "all mineral sites will be safeguarded only until the end date of their mineral planning permissions". Tarmac agrees that all mineral sites with planning permission for working (including dormant sites) and allocations should be safeguarded. Tarmac supports the proposed mineral site consultation zones of 500m for hard rock and 250m for soft rock quarries. Such an approach would ensure consistency with extant policy as set out in Policy M37 of the County Durham Minerals Local Plan, but argued that these stand-off distances should also be applied to MSAs. Tarmac agreed with the proposed safeguarding of minerals related infrastructure including the Kilns at Thrislington West Quarry.

### Council Response

- Support to overall approach from respondents noted.
- The approach to safeguarding relic sites is explained in the Local Plan Preferred Options, only sandstones, slates and ganister are proposed to be safeguard.
- The approach to sand and gravel has been amended to safeguard raised beach deposits and blown sand.
- The council will seek to safeguard the Port of Seaham.
- The council has reconsidered its proposed approach to what happens when planning permission ends. All economically important mineral will be safeguarded including after permission ends.